



GENERAL CLARIFICATION TEXT

“ACCERT Sertifikasyon, Belgelendirme, Danışmanlık, Eğitim ve Denetim A.Ş.”

(Pursuant to the Law No. 6698 on Protection of Personal Data)

In accordance with this Clarification Text herein, your personal data will be processed and stored within the scope of the legal exceptions, the legal reason of which is specified within the scope of Article 5 of the Personal Data Protection Law No. 6698. Within the scope of the said law, “ACCERT Sertifikasyon, Belgelendirme, Danışmanlık, Eğitim ve Denetim A.Ş.” (Hereinafter referred to as “ACCERT” in short) has the title of “Data Controller”. Your personal data, by means of preserving its accuracy and most up-to-date form, will be recorded, stored, preserved in a limited and measured manner, in connection with the purposes specified by ACCERT; and will be shared with the institutions that are legally authorized to request this personal data; and will be handed over, transferred to, and classified by third parties, in the country and/or abroad, under the conditions envisioned by the KVKK; and processed in other ways listed in the KVKK; thus you are informed about all these issues.

The categories of personal data that can be collected and processed by ACCERT are:

- **Identity Data**
Information contained in identity documents such as name, surname, identity no, date of birth
- **Contact Data**
Email, work phone number, home phone number, mobile phone, address
- **Personnel Data**
Title, company name, payroll information, resume information, performance evaluation reports
- **Legal Operation Data**
Information in correspondence with judicial authorities, information in the case file, determination and follow-up of our legal claims and rights, performance of our debts and our legal obligations
- **Customer Operation Data**
Information on invoices and receipts
- **Operation Security Data**
IP address information, website login and exit information, password, and password information
- **Finance Data**
Balance sheet information, financial performance information, bank account data, billing information, financial documents, and data
- **Professional Experience Data**
Diploma information, courses attended, vocational training information, specialist information, certificates, transcript information
- **Marketing Data**
Cookie records, survey



- **Audio and Visual Recordings Data**

Visual and audio recordings, audio, camera, video recordings

- **Philosophical Belief, Religion, Sect and Other Beliefs Data**

Information on religious affiliation, information on philosophical belief, information on sectarian affiliation, information on other beliefs

- **Health Data**

Information on disability, blood group, personal, device and prosthesis

- **Special Quality Personal Data**

Health, biometric, criminal data, association, foundation information

- **Data of Pictures and/or Videos That Can Identify You**

Photographs, video images and audio data processed when you attend events organized by ACCERT

- **Any Other Data You Have Decided to Voluntarily Share with ACCERT**

Personal data you share on your own initiative, feedback, opinions, requests, and complaints you send to us through social media, online platforms or other channels, evaluations, comments and our evaluations, uploaded files, areas of interest, our detailed review process before establishing a business relationship with you information provided for

- **Electronic Data Automatically Collected**

When you visit or use our website or applications and interact with us through other electronic channels, we may collect electronic data sent to us by your computer, mobile phone or other access device (for example, device hardware model, IP address, operating system) in addition to the information you transmit directly to us. version and settings, time, and duration of using our digital channel or product, links you click, data, etc.)

- **Customer / Supplier Data**

Information obtained and produced about data subjects such as the customer, supplier or customer, employee, authorized signatory within the supplier, as a result of the operations carried out by our units within the framework of our services

- **Incident Management and Security Data**

Information and assessments about the employees, managers of ACCERT or events that have the potential of affecting its managers, license plate and vehicle information, transportation, and travel information.

ACCERT collects personal data; from your website visit; from your job application form or resume; from interviews with you; from your reference; from legal authorities or third parties; when you receive or use our services; when you sell goods or provide services to us; when you contact us via our website, e-mail, social media platforms, other online channels or telephone, through complaints or feedback; when you apply for a job, internship at ACCERT; when you apply for training, exams and certification to ACCERT; when you attend our events, meetings, seminars, conferences and organizations; when you contact us for any purpose as a customer, potential customer, supplier, business partner, subcontractor; when we brief about developments and changes in the sector; when we contact you in the business processes we carry out; via internet, telephone, e-mail, through electronic applications specific to our customers; when you attend our business events, trainings and promotions; from filling out the documents arising from our legal obligations or when you interact with us in any other way, and from physical, written, verbal and electronic media.

Your personal data listed above are collected and processed within the scope of Articles 5/2-a, c, ç, e, f of the KVKK, depending on the personal data processing conditions and purposes, and/or in line with ACCERT's legitimate interests.

In addition, except the cases deemed necessary by the legislation, your personal data of special nature, such as health information, data on criminal convictions and security measures, will be processed in line with your explicit consent.



Terms of Processing Personal Data

In accordance with the conditions specified in Article 5 of the KVKK:

1. Personal data cannot be processed without the consent of the data subject in concern.
2. In the presence of one of the following conditions, it is possible to process personal data without seeking the explicit consent of the data subject in concern, if:
 - a) It is clearly envisioned in the laws.
 - b) It is compulsory for the protection of the life or physical integrity of herself / himself or another person, who is unable to express her / his consent due to actual impossibility or whose consent is not legally valid.
 - c) It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.
 - ç) It is mandatory for the data controller to fulfill its legal obligation.
 - d) It has been made public by the data subject in concern by herself / himself.
 - e) Data processing is mandatory for the establishment, exercise, or protection of a right.
 - f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

In accordance with the relevant articles, your explicit consent is obtained in cases where it is required. However, it is possible to process personal data without obtaining the consent of the data subject in concern, provided that it complies with the conditions set forth in paragraph 2 of Article 5.

To Whom and for What Purposes the Processed Personal Data can be Transferred

1. Employee Operations; fulfillment of obligations arising from employment contract and legislation, performance evaluation, fringe benefits and rights, health and satisfaction and loyalty processes, training, access authorization, remuneration and talent / career development activities for ACCERT employees,
2. Establishment and Management of Customer Relationships; carrying out business and operations within the scope of customer relations and activities, carrying out activities for customer satisfaction, following up requests / complaints, organizing congresses, promotions, and meetings,
3. Execution and Finalization of the Contract Process with Our Supplier / Business Partners; carrying out the business and operations to be carried out with the Supplier / Business Partners, organizing congresses, promotions and meetings, realization of the services offered by ACCERT, supply of goods and services, invoicing, contract establishment and performance, providing post-contract legal transaction security, providing shipment of goods and samples, management of logistical processes, product and service development, evaluation of new technology and applications and determination and implementation of ACCERT's commercial and business strategies, managing operations (demand, offer, evaluation, order, budgeting, contract), organizing business processes as a result of service / product / project quality processes and operations, system and application management operations within ACCERT, financial operations, management of financial affairs, supply of goods and services, management of registration process to our website applications,
4. Execution of Direct Promotion and Training Processes; making promotional and marketing notifications about our services by e-mail and telephone, conducting satisfaction surveys, evaluating and returning your opinions, complaints and comments on social media, online platforms or other channels, informing and promoting our customers about ACCERT innovations, promotion to be created through customer "classification" and personal information for the creation of special promotional activities for customer profiles and the prevention of unsolicited e-mails, marketing activities, congress, meeting, seminar, training, exam, certification, etc. organizing events,
5. Contact and support (upon your request); answering requests for information about our services, providing support for requests received through our communication channels, updating our records and database,



6. Compliance with Legal Obligations; Social Insurance Law No. 506, Identity Declaration Law No. 1774, Tax Procedure Law No. 213, Labor Law No. 4857, Turkish Penal Code No. 5237 Social Insurance and General Health Insurance Law No. 5510, Law No. 5651 on Regulation of Broadcasts on the Internet and Fighting Crimes Committed Through These Broadcasts, Insurance Law No. 5684, Turkish Law of Obligations No. 6098, Turkish Commercial Law No. 6102, Occupational Health and Safety Law No. 6331, Law No. 6698 on the Protection of Personal Data, Relevant institutions or organizations to the extent permitted but not limited to and required by the Law No. 4982 on the Right to Obtain Information and other legislation; Personal Data Protection Institution, Turkish Ministry of Treasury and Finance, Turkish Ministry of Family, Labor and Social Security, Turkish Employment Agency (İş-Kur), Execution of processes before official institutions, especially the Information Technologies and Communication Authority, preparing the capacity report arising from the activities, conveying information on environmental permits, record keeping and disclosure obligations, compliance and control, inspections of official authorities, follow up and finalization of our legal rights and lawsuits, carrying out the necessary processes within the scope of compliance, contacting regulatory and supervisory institutions within the scope of the requirements and obligations determined in order to ensure the fulfillment of the legal obligations specified in the KVKK as required or mandated by the legal regulations,
7. Planning and Execution of ACCERT's Commercial Activities; budgeting, in line with the purpose of determining, planning, and implementing ACCERT's commercial policies in the short, medium, and long term, determining and implementing commercial and business strategies; communication, market research and social responsibility activities carried out by ACCERT, purchasing,
8. Reporting and Auditing; execution of ACCERT activities, internal audit, external audit, and reporting processes,
9. Protection of Rights and Interests; defense against legal claims, lawsuits, investigations etc. filed against ACCERT.

Also, your personal data;

In order to fulfill the requirements within the scope of the Labor Law, the Occupational Health and Safety Law, the Social Security Law and related legislation, other laws, and regulations, particularly;

- We can share it with the consultancy firms we work with and private employment offices, in order to receive consultancy regarding the determination and calculation of incentives that we can benefit from.
- We can transfer payroll information to ACCERT's auditors so that they can perform audit activities.

In particular, due to fulfilling our legal obligations;

- In order for us to exercise our right of defense, we can share it with our lawyers and relevant institutions within the framework of our obligation to fulfill legal requests such as court decisions or evidence requests, provided that it is in accordance with the law and procedure.

ACCERT's administration, conduct of business, enforcement of its policies, in particular;

- We transfer the shipments to the cargo companies in order to carry out the business processes.
- We transfer it to the financial advisor firm in order to carry out the business, customer, and supplier processes.
- We transfer it to the hosting company for the purpose of conducting business, customer, and supplier processes.

Retention Period of Personal Data

All personal data collected and processed about you during the recruitment processes will be kept subject to the retention periods within the scope of the relevant transaction or activity. Storage periods are included in the relevant Clarification Texts.

In this context, personal data processed on the basis of your explicit consent will be processed within the specified timeframes and stored in accordance with the Law, unless you withdraw your explicit consent.

In addition, in case of any dispute that may arise between ACCERT and other parties, your personal data may be stored (during the statute of limitations determined in accordance with the legislation) for the purpose of making the necessary defenses within the scope of the dispute.



After the time has passed, your personal data will be deleted, destroyed and/or anonymized by ACCERT or upon your request, by methods within the scope of the Personal Data Protection Law and relevant regulations.

Data Subject's Rights

Within the scope of KVKK, you have the following rights regarding your personal data:

- to learn whether your personal data are processed or not,
- to demand for information as to your personal data have been processed,
- to learn the purpose processing of your data and whether these personal data are used in compliance with the purpose,
- to know the third parties to whom your personal data are transferred in the country or abroad,
- requesting the rectification of your personal data in case of incomplete or inaccurate processing,
- requesting the erasure or destruction of your personal data in the event that the reasons requiring the data be processed disappear,
- requesting notification of your corrected or deleted information, to third parties to whom personal data has been transferred, if any,
- to object to the occurrence of a result against the person himself / herself by analyzing the processed data solely through automated systems,
- to claim compensation for the damage arising from the unlawful processing of your personal data.

Data Controller and Representative

The Law on the Protection of Personal Data No. 6698 ("KVK Law") has granted subjects of personal data to make such demands as to be informed about their personal data, to access these data, to learn whether these are used in compliance with the purpose, and to request the correction or deletion of those, as mentioned above.

During the exercise of these rights, the person who determines the purposes and means of processing the said data and is responsible for the establishment and management of the data recording system (Data Controller), is "ACCERT Sertifikasyon, Belgelendirme, Danışmanlık, Eğitim ve Denetim A.Ş."

If you submit your requests regarding your aforementioned rights to us through the methods specified in the Data Subject Application Form which is located in "https://accert.com.tr" address, your applications will be reviewed by the Data Controller and evaluated as soon as possible and within 30 (thirty) days at the latest. Although it is essential that no fee is charged for the requests, ACCERT reserves the right to charge a fee based on the fee tariff determined by the KVK Board.

If the Data Subject makes a request that will result in the inability to use any of her / his personal data by ACCERT, she / he may not be able to fully benefit from the service and operation of ACCERT. Any liability arising in this context will belong to the Data Subject. ACCERT will not take any responsibility for any loss or damage to the Data Subject that will occur due to this reason.

