

# **PERSONAL DATA PROTECTION LAW NO 6698 (“PDPL”) ONLINE COMMUNICATION CLARIFICATION TEXT**

## **I. Data Controller**

This text establishes that your personal data obtained within the scope of the application, suggestion, or complaint made by you through the social media, Human Resources, and Contact Us tabs on our website and the Info e-mail within the scope of Personal Data Protection Law no 6698 (“PDPL”) and other relevant legislation, is under protection and to what extent it will be processed.

**Processing:** is defined in article 3 of PDPL as recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making available, and classification operations performed on personal data.

## **II. Personal Data Collection Methods and Legal Reasons**

Our company processes the personal data of the real persons who establish contact with us for applications, suggestions, and complaints made via our website, Facebook, Instagram, and similar social media platforms and info mail regarding the services and products offered by our company. The name, surname, address, telephone number, e-mail address, photograph, age, gender, IP information, customer transaction, and social media records of the applicant are processed by our Company under the following conditions and scope.

## **III. Purposes of Processing Personal Data**

**Your personal data will be processed by our Company for the following purposes within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the PDPL:**

1. To be able to answer questions and requests regarding the services provided by our Company,
2. To be able to communicate with the person who applied/asked a question from online platforms when necessary,
3. Keeping financial and accounting records, if the documents sent via online communication methods are relevant,
4. Obligation to notify the Relevant Public Institutions and Organizations, Notary Public, Court and Prosecutor's Offices and fulfilling the obligations before any and all legal authorities in order to protect the legal rights of our Company,
5. To provide information when requested by judicial and administrative authorities,
6. To fulfill all other legal obligations.

## **IV. Transfer of Personal Data**

Our company exercises all due diligence to process your personal data in accordance with the "need to know" and "need to use" principles, by ensuring the necessary data minimization and by taking the necessary technical and administrative security measures. On grounds, ensuring the security of the compound of the Company, the execution or control of the processes of

ensuring compliance with workplace rules, and the operation of digital infrastructures necessitate continuous data flow with different stakeholders, we become obliged to transfer the personal data we process to third parties for certain purposes.

Your personal data will be processed by our Company officers within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the PDPL in order for our Company to continue its commercial existence and to achieve the above-mentioned purposes and may be transferred to the 3<sup>rd</sup> parties listed below.

1. In order to protect the legal interests of our Company, to our Company's independent auditors, financial advisors, suppliers, consultants, lawyers, banks we work with, and to the authorized employees of these parties, and
2. In order to carry out our activities as per the relevant legislation, to the judicial authorities and administrative organs, legally authorized public and private institutions and organizations.

## **V. Rights of the Relevant Person**

Personal data owner "Relevant Person" will be able to declare his rights and requests below in Article 11 of the Personal Data Protection Law by duly filling out the Application Form at the address [www.biruni.com.tr/kvkk](http://www.biruni.com.tr/kvkk). Within the scope of Article 11 of the PDPL No 6698, everyone has the right to apply to our Company as a data controller:

Everyone, by applying to the data controller;

- a) Learning whether personal data of him/her is processed or not,
- b) If personal data has been processed, requesting information about it,
- c) Learning the purpose of processing personal data and whether they are used in accordance with its purpose,
- ç) To know the third parties to whom personal data is transferred in the country or abroad,
- d) Requesting correction of personal data in case of incomplete or incorrect processing,
- e) Requesting the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of Law No. 6698, (Provisions in other laws regarding deletion, destruction, or anonymization of personal data in accordance with paragraph (2) of the same article are reserved.)
- f) Requesting notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom personal data has been transferred,
- g) Requesting notification of the transactions made pursuant to subparagraphs d) and (e) to third parties to whom personal data has been transferred,
- ğ) Objecting to the emergence of a result against the person himself /herself by analyzing the processed data exclusively through automated systems,
- h) In case of loss due to unlawful processing of personal data, s/he has the right to demand compensation for the damage.