

Turkish Airlines Protection of Personal Data Announcement for Employees

Introduction

Türk Hava Yolları Anonim Ortaklığı (hereinafter referred to as “THY”, “Company” or “We”), pays the utmost attention to the lawfulness of the processing of personal data of Company’s, affiliates’ and contractors’ employees. The *Turkish Airlines Protection of Personal Data Announcement for Employees* (“**Announcement**”) herein has been prepared in accordance with the Article 10 of Law on Protection of Personal Data numbered 6698 (the “**Law**”) and related other applicable law and legislation to ensure that your personal data, as employees, is processed in a transparent manner.

In this respect, as a data controller, we provide you information on which personal data we process and for which purposes, the third parties we share your data with, your rights and the methods that you may use to contact us.

For more detailed information about the processing of your personal data, you may review the Data Authorities Registry (VERBİS) (<https://verbis.kvkk.gov.tr/>) managed by the Presidency of the Personal Data Protection Authority or “Türk Hava Yolları Anonim Ortaklığı Privacy Notice on the Processing and Protection of Personal Data of Employees” published on Company portal.

How Do We Collect Your Personal Data?

From the start of your employment relationship, your personal data can be collected fully/ partially automated or non-automated methods via printed documents (e.g. CV information that you may provide or social security records), forms (e.g. recruitment / periodic health inspection application form) in some instances, through digital channels and platforms (e.g. information obtained directly from public institutions or authorized hospitals of the General Directorate of Civil Aviation (“SHGM”) or online platforms used exclusively for job applications) to fulfil certain legal obligations. In any case, your personal data may only be collected and processed in accordance with applicable laws. As per the Law, your personal data may only be processed where one or more conditions that are stipulated under Law are present. As THY, regardless of the purpose for which we process your personal data, we process it in accordance with the provisions of national and international law, primarily the general principles stated under Article 4 of the Law and by relying on conditions for lawful data processing listed under Article 5 and 6 of the Law.

- Where your explicit consent is required (e.g. private health insurance),
- Where data processing is explicitly permitted by any law (e.g. creating and preserving of employee personnel file),
- Where it is necessary to process the personal data of parties of employment agreement, provided that the processing is directly related to the execution or performance of the agreement, (e.g. processing of your financial data in order to pay your salary within the scope of the employment agreement),

- Where it is necessary for compliance with a legal obligation which THY is subject to (e.g. in accordance with the law, we request you to renew your contact information as part of our legal obligation to keep your data up to date.),
- Where you reveal your personal data (e.g. documents you provide us in order to make your visa applications by us),
- Where it is necessary for the institution, usage, or protection of a right (e.g. benefiting from the awards we have prepared to increase your performance),
- Where it is necessary for the legitimate interests of THY , provided that the fundamental rights and freedoms of employees are not harmed (e.g: data processing in accordance with the quality and standards that THY is obliged to comply)

Your special personal data are processed based on the following legal reasons:

- your explicit consent is obtained,
- Personal data other than your health data, without seeking explicit consent in cases stipulated by law,
- Personal data related to health is only for purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing by persons under the obligation of secrecy or authorized institutions and organizations.

In cases where your explicit consent is needed, your personal data will be processed limited to the scope of the explicit consent offered by you with free will. We would like to remind you that you have the opportunity to withdraw your open consent at any time.

Which Personal Data Do We Process?

General information on your personal data processed by THY are as follows (For more detailed information about the type of personal data processed, you may review the Data Authorities Registry (VERBİS) (<https://verbis.kvkk.gov.tr/>) managed by the Presidency of the Personal Data Protection Authority or "*Türk Hava Yolları Anonim Ortaklığı Privacy Notice on the Processing and Protection of Personal Data of Employees*" published on Company portal.)

- Identification and passport information, CV information, information with regard to the agreement between you and THY, contact information (personal data such as e-mail address, phone number, mobile phone number, social media contact information, home address etc.), where applicable information required to assess the eligibility of foreign duties and for foreign employee e.g. passport/ID, visa information, residence permit, work permit, citizenship/dual citizenship information, Greencard (Lawful Permanent Resident Card, Form I-551, etc.) information, immigration status etc.
- Where you have explicit consent and sent it to us, your association, foundation membership information processed in accordance with the relevant legislation,
- Location data, (location information collected through the use of company vehicles or company phones and laptops provided to you,
- Health insurance information for your family members and relatives, child disability information, getting emergency contact information, personal data in order to provide

marriage or new born support, kindergarten allowance and CED, ZED, PASS ticket transactions, etc.

- Personal data of our employees or persons who are in working relationship with our company which processed to collect essential information that will be basis of employee personal rights (e.g. biometric/non biometric photograph, aircraft crew personnel height / weight information, disability information, military information, criminal record, pregnancy information, license information, aircraft crew documents, identity / passport copy required for the preparation of apron card, landing card etc. documents or other information required under the relevant legislation),
- Process personal data related to plan and manage employee performance and career development and assessment within the scope of our company's human resources,
- Health data on the purpose of Occupational Health And Safety regulation, protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing or civil aviation health rules by persons under the obligation of secrecy or authorized institutions and organizations.
- Process and transfer the trade union information as per Collective Labour Agreement and related legislation,
- Process personal data within the scope of mobile applications where you download from TK Store stores owned by THY,
- Personal data related to process security such as account and password information during access to THY's digital platforms or IP information of the websites which you reached in company premises,
- To comply with the legal obligations that THY is subject to (primarily the Regulation on Providers of Internet Collective Use (OG. 11.04.2017 / 30035)), the password and account information you have created during access to THY digital platforms or personal data related to transaction security such as IP information about the websites you access in Company premises and records of technological tools and equipment allocated to the employees for professional use by THY and communication with them and your information regarding risk management that is processed to manage commercial / technical / administrative risks,
- Your information regarding the physical security, such as CCTV records, employee entrance and exit records,
- Where you have explicit consent, your fingerprint data, which are biometric data used in the entrance and exit of THY locations and loaded on your personnel cards.
- Your financial information such as bank account information, card information.

What are the Purposes for which We Process Your Personal Data?

THY will process your personal data for the following purposes. (For more detailed information about the type of personal data processed, you may review the Data Authorities Registry (VERBİS) (<https://verbis.kvkk.gov.tr/>) managed by the Presidency of the Personal Data Protection Authority or the *Türk Hava Yolları Anonim Ortaklığı Privacy Notice on the Processing and Protection of Personal Data of Employees* published on Company portal):

- Fulfilling contractual obligation, managing assignment processes, carrying out management activities including personnel management, distribution of work and salary, premium, retirement, employee rights management such as health, insurance and leave permits,
- Managing processes of working and residence permit of foreign employees, working domestically and appointment staff of temporary workers working abroad,
- Carrying out disciplinary and ethical procedures of employees in accordance with the Company policies and procedures, internal audit, investigation, intelligence activities, evaluating performances and salaries, bonuses and other compensation accordingly, receiving and evaluating suggestions for improving business processes,
- Collecting and processing of the necessary documents regarding the opportunities and benefits provided to employee without being directly linked or related to the labor relationship ,
- The portal allocated to the use of the employees by the Company in the process of the work process, to be used for the recognition of the employees in the systems,
- Making announcements about appointment, promotion, retirement, turnover, death etc. ,
- Carrying out logistics activities and providing transportation opportunities,
- Carrying out social responsibility and civil society activities, sponsorship activities, organization and event management,
- Managing the processes of loyalty to products, discounts and services offered within the framework of brand collaboration offered by THY or contracted third parties,
- Within the scope of the contractual obligations, processing and transferring information such as business e-mail address, internal phone number for the purpose of communicating with third parties, collecting voice records in order to receive requests and complaints, making evaluations regarding team allocation within the scope of the job definition, measuring the service quality,
- Giving information to authorized people and institutions,
- Carrying out occupational health and safety activities, to keep the database of employee history after the end of the employment relationship or to use it as evidence in case of a conflict, to fulfill the obligations arising from the legislation, to follow and execute legal affairs,
- Ensuring the security of our company's premises, buildings, offices, airports, production areas, workshops, warehouses, fairs and event areas and other similar work areas (such as CCTV records),
- Organizing communication and cultural activities such as seminars, birthday celebrations, competitions, sweepstakes for our employees and conducting employee satisfaction assessment surveys,
- Emergency management, information security requirements, risk management processes, data access authorities, processes related to training activities, execution of strategic planning activities, ensuring the security of data supervisor operations,
- Ensuring the security of movable goods and resources, carrying out supply chain management processes.
- Fulfillment of labor contracts and legislative obligations for employees,

- Carrying out the activities in accordance with the legislation.

To Whom Why and Where We Transfer Your Personal Data?

Under certain circumstances, we may transfer your personal data to third parties residing within borders or abroad, in accordance with applicable laws and the provisions of national and international law particularly Articles 8 and 9 of the Law.

Third parties that we may transfer your data can be listed categorically as follows:

- **Our business partners or suppliers residing within borders or abroad;** e.g. Various suppliers, notary, sworn translation offices, financial advisors, financial audit firms, occupational health and safety experts or miscellaneous consultancy providers that we are in business relations with. Additionally, under certain conditions, information such as identification information or CV information of our employees may be shared with our business partners within the scope of activities that you carried out on behalf of THY.
- **Group companies;** e.g. Certain services offered by THY are carried out by our affiliates, within this context, your personal data may be shared with our relevant affiliates. You may find more detailed information regarding our group companies by using the following link: <https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html> *Privacy Notice on the Protection and the Processing of Personal Data* or <https://www.turkishairlines.com/en-tr/press-room/about-us/index.html>
- **Authorized private institutions and organizations authorized by national and international legislation or national and international public institutions that can take decisions to affect the Company and / or the operations of the Company;** e.g. Administrative and judicial authorities authorized under the relevant legislation, audits within the scope of Labor and Social Security Legislation, financial audits, demands of national and international aviation authorities such as SHGM, IATA, Office of Foreign Assets Control, ("OFAC"), Bureau of Industry and Security ("BIS"), The Transportation Security Administration ("TSA"), Ministry of Family, Labour and Social Services .

What are Your Rights as Data Subjects?

As data subjects, you are entitled to a number of rights under Article 11 of the Law in relation to your personal data. We would like to inform you about the rights that you are entitled to and the ways you may use them.

The rights you have under the Article 11 of the Law are as follows:



Learn whether data relating you are being processed,



Request further information if personal data relating to you have been processed,



Learn the purpose for the processing of personal data and whether data are being processed in compliance with such purpose,



Learn the third-party recipients to whom the data are disclosed within the country or abroad,



Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred,



Request deletion or destruction of personal data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law and other applicable laws and request such process to be notified to third persons to whom personal data is transferred,



Object to negative consequences that you experienced as a result of analysis of the processed personal data by solely automatic means,



Demand compensation for the damages you have suffered as a result of an unlawful processing operation.

You can easily use your rights mentioned above and easily communicate the related requests to us via contact information below. Data subjects' requests concerning the above-listed rights shall be concluded by us within thirty days at the latest, in accordance with the limitations provided by the Law. In principle, data subject requests shall be concluded free of charge. However, Turkish Airlines reserves its right to demand a fee from the tariff specified by the Board, in case the request requires additional costs.

Contact Information



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