

Privacy Notice on the Processing and Protection Of Personal Data Of Employees

Last Update: 16.03.2020 Revision Number: 01

Turkish Airlines (hereafter will be referred as “**THY**”, “**Company**” or “**We**”) conducts certain personal data processing activities within the scope of employment relationship among Company’s, service relationship among our affiliates and contractors employees and us. We acknowledge our responsibilities arising from the legislations that we are subjected to while we are running data processing operations and we take all necessary measures to ensure that your personal data are processed in accordance with the law.

Alongside with other various technical and operational actions that we take to this end, we have prepared the Türk Hava Yolları Anonim Ortaklığı Notice on the Processing and Protection of Personal Data of Employees (“**Notice**”) herein and submitted for the consideration of our Company, affiliates’ and contractors’employees. Within the Notice, the principles to be complied when processing the personal data of our employees have been determined and steps have been taken to ensure that data processing activities of our Company are transparent. As Turkish Airlines, our primary objective is to ensure full compliance with all national and international legislation that we are subjected to, primarily with Personal Data Protection Law numbered 6698 (“**Law**”).

Lawfully processing personal data of our employees is our priority. For this reason, we take all necessary measures to ensure that all personal data of our employees are secure and any unlawful access or disclosure of personal data are prevented.

Under certain circumstances, we may share the personal data of our employees with third parties. Where we conduct such transfers, we share the minimum possible personal data and share only with our trusted business partners. In addition, we take all necessary technical and administrative measures to avoid any breach of data during and after the relevant data sharing.

As data subjects, you are entitled to various rights in relation to your personal data under the Law. We take all necessary measures and we show the utmost respect your preferences to ensure that our employees have control over their personal data and they can easily utilize their rights that they are entitled to under the Law.

An important right that you are entitled to under the Law is to learn for which purposes that your personal data are collected and transferred. For you to use this right and ensure that your personal data is processed transparently, we have provided information about the purposes for which your personal data is processed for under the Notice. You may find detailed information regarding what kind of personal data are processed for what purposes, you may refer to title “*For Which Purposes Do We Process Personal Data?*” of the Notice.

You may find information regarding other rights that you are entitled under the Law from the title “*Rights of the Data Subjects*”. To find information about how you can use these please refer to title “*The Exercise of Rights by the Data Subjects*”. You may also contact us through the channels stated under title “*Questions and comments*” should you have questions or feedback about your rights, methods that you may use these rights or about the Notice in general.

Sincerely,

Türk Hava Yolları Anonim Ortaklığı

1. Introduction

This Notice is prepared in order to provide necessary information regarding which personal data relating to Company's, affiliates' and contractors' employees are processed by THY in the course of the employment relationship established with the related employees as well as after the employment relationship is terminated as well as to ensure transparency.

This Notice consists of explanations regarding the processing of personal data relating to employees of THY; whereas explanations concerning the processing of personal data relating to other persons (e.g. customers of THY) are provided for under the Türk Hava Yolları Anonim Ortaklığı Notice on the Processing and Protection of Personal Data located at <https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html>.

The nature of the relationship established with our Company affects the processing activities performed upon your personal data. For instance, as an employee of THY, in case you purchase a ticket on the website operated by THY, personal data relating to you will be subject to processes concerning our customers' personal data, and the indications provided within this Notice will not be applicable for the processing activities.

We reserve the right to make changes to this Notice in order to provide accurate and up-to-date information concerning practices and regulations relating to the protection of personal data. Additionally, data subjects will be informed by appropriate means in the event of a substantial change to the Notice.

2. How Do We Obtain Your Personal Data?

As THY we may collect personal data relating to our employees through a multitude of channels. For instance, job application forms, CVs, passports, driver's licenses, identification documents, assessment forms filled during engagement or in the course of employment relationship, interviews, meetings, in some cases, from digital fields and platforms, for example, information directly from public institutions or authorized hospitals of the General Directorate of Civil Aviation ("SHGM") or online platforms used exclusively for job applications, closed circuit television in Company premises.

In certain circumstances, we collect personal data relating to you from third parties. For instance, your references and from firms in the course of background checks. In such cases where personal data are not obtained from you and we must comply with the obligation to inform, such obligation shall be complied with within a reasonable period.

3. Which Personal Data Do We Process?

Your personal data collected by us may vary according to the nature of our business relationship. In this respect, your personal data which are collected through different channels are categorized as below:

- **Identification and/or Passport Information** (personal data such as name, surname, date of birth, gender, 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.)
- **Contractual Information** (information with regard to the agreement between you and THY such as salary, side benefits and interests, insurance information)

- **Contact Information** (personal data such as e-mail address, phone number, mobile phone number, social media contact information, address etc.)
- **Location Data** (location information collected through use of company vehicles or company phone and laptop by provided to you)
- **Work Information** (All processed personal data related to all kinds of activity by our employees or legal persons who are in a working relationship with our company, such as arrival-departure times from work)
- **Family Members and Relatives** (health insurance, child disability information, getting emergency contact information, identity, contact and professional, educational background, information of family members and relatives for the purposes of providing marriage or new born support, kindergarten allowance and CED, ZED, PASS ticket transactions , etc.)
- **Employee's Personal Information** (All kind of personal data biometric/non biometric photograph, aircraft crew personnel height / weight information, disability information, military information, pregnancy information, license information, aircraft crew documents, identity / passport copy required for the preparation of apron card, landing card etc. documents or required for the preparation of related documents of our employees or legal persons who are in working relationship with our company which processed to collect essential information that will be basis of employee personal rights)
- **Employee Performance and Career Development Information** (Personal data of clearly identified or identifiable subject, which processed as partly or fully automated or non-automated as being part of the data record system; personal data processed to plan and manage career development within the scope of our company's human resources policy through measuring employees' performances)
- **Process Security Information** (Personal data related to process security such as password information during access to THY's digital platforms or IP information of the websites which you reached in company premises)
- **Risk Management Information** (Various inquiry results and records provided by public institutions which linked with personal data subject, information requested from prosecution office during investigations, records of address recording system, IP surveillance records etc.)
- **Financial Information** (Bank card information which will be specially used for payments related to employment agreement, bank account information, IBAN information, credit balance etc. various financial information)
- **Physical Location Security Information** (Entrance/Exit records from company locations, visiting information, camera and voice records etc.)
- **Legal Act and Compliance Information** (Information requests from judicial and administrative authorities or data found inside decisions etc.)
- **Auditing and Inspection Information** (Personal data collected through auditing and inspection by THY)
- **Special Categories of Personal Data** (As particularly being about work safety and well-being, health condition, and all other data regarding , religious beliefs association, charitable foundation or trade union membership, health and sex life, previous conviction, security measures, your fingerprint data, which are biometric data used in the entrance and exit of THY locations and loaded on your personnel cards etc.)
- **Reputation Management Information** (Information collected to preserve THY's business reputation and assessment reports and actions taken with regard to these information)
- **Event Management Information** (Personal data processed regarding necessary legal, technical and administrative measures to be taken for preservation of our company's business rights and interests and clients' rights and interests)

- **Request/Complaint Management Information** (Collected information about requests and complaints related to the subject and information about the result of reports of those evaluated by related business units etc.)
- **Audio-Visual Data** (Photographs, camera recordings, voice recordings etc.)

4. For Which Purposes Do We Process Personal Data? What Is The Legal Basis?

As per the Law, personal data can only be processed in the presence of at least one of the conditions set forth under Articles 5 and 6 of the Law and/or required by international legislation. In this respect, as THY we process personal data based on legal reason; our employees within the scope of the conclusion or performance of employment agreements, fulfillment of the obligation arising from the employment agreements, expressly permitted by law, compliance with our legal obligations under the relevant regulations and our legitimate interests provided that such interests do not have a negative impact on our employees' fundamental rights and freedoms, where the employees have revealed their personal data to the public for example when the visa applications are requested to be completed by THY and in order to establish a right for our employees and exercise this right.

In addition to the above-listed conditions for processing personal data, we may request you to explicitly consent to the processing of your personal data (e.g. when we process special categories of personal data). If this is the case, personal data will be processed limited to the scope of your freely given explicit consent. You may at any time revoke your explicit consent.

In this regard, personal data will be processed by THY, in accordance with the conditions for processing personal data set forth under Articles 5 and 6 of the Law and within the scope of the below-listed purposes:

4.1. Compliance with obligations under the employment agreement

Your personal data may be processed within the scope of the contractual obligations related to the employment agreement between you and THY. In this respect, your personal data may be processed for purposes such as;

- fulfilling contractual obligations such as personnel management, distribution of work and salary, premium, retirement, employee rights management such as health, insurance and permits,
- evaluation of employee performances and accordingly salary, bonus and other compensation assessments,
- gathering and processing necessary documents related to opportunities and side benefits provided due to direct or indirect working relation,
- 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,
- preserving working history database after the end of employment relation or using as evidence in case of conflict,
- making announcements about appointment, promotion, retirement, turnover, death etc.

4.2. Carrying out Company's business operations and executing human resources processes

As THY during our human resources procedures we may process our employee's personal data. In the meantime, while carrying out our company's business operations, processing of our employee's personal data may be needed. In this respect, your personal data may be processed for purposes such as;

- maintaining effective employee management and further development,
- maintaining management activities,
- managing, following employee assignments processes and determining qualifications for specific assignments,
- managing and finalizing employee's request and complaints,
- executing and following internal and external employee training plan,
- fulfilling reporting activities,
- evaluating and receiving suggestions for improving business processes,
- carrying out strategic planning activities, ensuring the security of THY operations,
- ensuring the security of movable goods and resources, carrying out supply chain management processes,
- ensuring compatibility with the liabilities arising from agreements that THY is part of, THY's company policies and codes of practice,
- gathering information needed to evaluate employee performances, to execute disciplinary and complaint hearings and internal audit investigations and intelligence activities,
- establishing one or more internal and external employee indexes which include information such as employee names, positions and titles, information about employment agreements and report channels,
- sharing with telecommunication companies and their affiliates to satisfy the need for information technologies of employees and to identify line of work,
- keeping data to evaluate suitability of employees for other positions,
- organizing seminars, training, communication and cultural activities for employees,
- conducting 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,
- keeping and carrying out of internal functioning in the corporate portal allocated for employees,
- giving gifts to employees in special days and birthdays and arranging events,
- conducting employee satisfaction assessment surveys,
- providing private health insurance to employees.

4.3. Processing of employee personal data within the scope of their electronic communication activities in relation with their work

Before initiating complaint or disciplinary procedure against an employee, based on any information which collected through electronic communication activities, we care to provide the right to review the collected information and the right of defense to the concerned employee. In case collected data is regarded as special categories of personal data, below stated notice provisions will apply for processing special categories of personal data.

- **Corporate E-mail:** Personal data collected from employee's corporate e-mail, will be processed in a limited manner only to assure legal and commercial security of the company, employees and third parties that the Company is in business relation with.
- **Use of Internet:** Personal data related to employees' use of internet, may be processed in a limited manner pursuant to applicable law and to assure legal and commercial security of the company, employees and third parties that the company is in business relation with.
- **Mobile Application:** Personal data processed within the scope of mobile applications that can be downloaded from TK Store stores owned by THY.

- **Security Camera:** In case of collecting personal data due to use of camera recordings for security of Company premises, buildings, offices, airports, production areas, workshops, warehouses, fairs and event areas, etc. and work areas and other related purposes by THY s; collected personal data may be processed to investigate a suspected activity, to resolve a conflict or to use as an evidence in case of a complaint or for other purposes stated in this Notice.
- **Company vehicle and service vehicle:** Provisions stated in this Notice will be applied for processing personal data collected during logistic activities related to company vehicles and service vehicles that assigned to employees.
- **Corporate Fixed – Line Telephone:** Taking voice recordings for the purpose of evaluating the team allocation within the scope of the job definition, measuring the service quality, evaluating the demands and complaints,

4.4. Establishing, maintaining and improving health and safety at work and emergency management

We may process your personal data including health data to comply in particular with health and safety and aviation regulations and also with the company’s legal liabilities and protection of public health and for emergency management. In this respect your personal data may be processed for purposes such as;

- Preserving, storing and preparing health records and medical reports including medical test records done periodically during the employment,
- Tracking days on leave due to sickness,
- Calculating health expenses and managing benefits provided to employee along with detecting employee’s suitability to work and making necessary workplace arrangements,
- Finding out and preserving blood type for emergency,
- Reaching employee’s and relatives’ information and making identity validation during emergency,

Company pays specific attention to process personal health data within the narrowest possible scope. While processing your health data, we comply to “Adequate Measures to Be Taken By Data Controllers While Processing Special Categories of Personal Data” issued by the Personal Data Protection Board. We take necessary precautions to ensure that only workplace doctor and authorized personnel under the obligation of secrecy or authorized institutions and organizations can access to your health data. While processing health data, briefings are given to people who are authorized to perform such procedures to make them comprehend the sensitivity of these data and to be able to make them take necessary precautions.

4.5. Carrying out finance or accounting operations

Your personal data may be processed during financial or accounting operations. In this respect your personal data may be processed for purposes such as;

- Fulfilling obligation to inform arising in connection with the tax regulation,
- Making salary and premium payments,
- Carrying out financial risk management or financial auditing procedures,
- Tracking expenses and calculating periodic budgets.

4.6. Compliance with obligations under regulations to which we are subjects and informing competent authorities accordingly

Your personal data may be processed to fulfill legal liabilities arising from in particular the employment law, health and safety at work, collective labor agreement, social security and aviation regulations, and the governing regulations and to comply with national and international regulations regarding information storage, reporting, recording, informing, tax liability, international sanctions and other liabilities. In this respect, your personal data may be processed for purposes such as;

- Preparing employee's personnel files arising in connection employment law, fulfilling obligations regarding health and safety, payrolls and taxes,
- Complying with the liabilities regarding identification and authentication,
- Preventing, detecting and investigating crimes including fraud and money laundering,
- Providing information and documents requested by authorized domestic and foreign public institutions, organizations, regulatory authorities and national and international public institutions those may make decisions that affect the Company and / or the Company's operations or providing access to such person and institutions regarding information and documents to fulfill liabilities within the scope of international and national civil aviation regulations,
- Delivering information requested from THY's overseas affiliates within the context of investigations carrying out abroad.

5. Transfer of Personal Data

Your personal data will be shared between business units within THY. During and after the transfer, the responsible persons in the relevant units will have access to your personal data, provided that such access is limited to the personal data that they are required to access by their job description.

Your personal data may be shared with parties who provide product or service to us or on behalf of our company and with our domestic and foreign suppliers and business partners, notary, sworn translation offices that we get support for the establishment, execution and termination of our relationship, including the parties collaborating with us for the purposes of providing products and services to you. Your personal data may also be shared with public institutions and private persons authorized by law within the scope of their authorization. In such cases, our company takes all precautionary measures to ensure that the parties carry processing and transfer activities in accordance with the rules stated in this notice and other related law.

In accordance with Articles 8 and 9 of the Law, THY may transfer personal data relating to employees to the below-listed groups:

- (i) Affiliates of THY,
- (ii) Company executives,
- (iii) Shareholders,
- (iv) Business Partners,
- (v) Service Providers,
- (vi) Legally authorized public institutions and organizations,
- (vii) Legally authorized private entities.

The scope above-mentioned recipient groups and the purposes for the transfer of personal data are specified below. **Table 1 : Data Transfer Table**

Recipient Groups	Definition	Purpose of Transfer
Business Partners	Refers to the parties THY has established business partnerships with, in the course of its commercial activities for the purposes of human resources services, financial support or audit services.	Limited with the purpose of ensuring fulfilment of the objectives of the business partnership.
Service Providers	Refers to the parties providing services to THY on a contractual basis and in accordance with THY's orders and instructions.	Limited with the purpose of providing services outsourced by the relevant service providers and necessary for the conduct of THY's commercial activities.
Affiliates of THY	Refers to the legal entities that are engaged in commercial activities in order to carry out business and transactions related to civil aviation and to provide various services.	Limited with the purpose of providing the necessary information to carry out the commercial activities of our Company and its affiliates.
Shareholders	Refers to our shareholders authorized to determine our Company's commercial strategies and audit operations, in accordance with the relevant legislation.	Limited with the purposes of determining our Company's commercial strategies and audit operations, in accordance with the relevant legislation.
Company Executives	Members of the executive board and other authorized persons.	Limited with the purposes of determining commercial strategies, ensuring the management of our Company on an executive level and audit operations.
Legally Authorized Public Institutions and Organizations	Competent national and international public institutions granted with the authority to request information or documentation from THY, in accordance with national and international regulation to which THY is subject.	Limited with the scope and legal authority of the relevant public institution or organization.
Legally Authorized Private Entities	Competent national and international private entities granted with the authority to	Limited with the scope and legal authority of the relevant private entity.

	request information or documentation from THY, in accordance with national and international regulation to which THY is subject.	
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Personal data may be shared with group companies, business partners, public institutions and private persons authorized by law pursuant to conditions and purposes of processing personal data as stated under Article 8 and 9 of the Law, and may be transferred abroad, limited with the stated purposes and in accordance with the principles and procedures stated under Article 9 of the Law and decisions of the Personal Data Protection Board.

Your personal data may only be transferred abroad where;

- your explicit consent is obtained, or where your explicit consent is not obtained but one or more data processing condition(s) which stated in the Law are met;
 - the transferred country found to be offering adequate protection by the Personal Data Protection Board decision or;
 - in case of the protection in the transferred country found to be inadequate, a written undertaking to provide adequate protection between our Company and the Data Controller that the data are being transferred to have been reached and the approval of the Personal Data Protection Board have been obtained.
- Within the scope of the provisions in the relevant laws.

6. Retention of Personal Data

Our company determines the retention periods by taking into consideration of the applicable law and purposes of data processing. In this respect, where applicable, we particularly consider the issues of period of limitation and legal obligations regarding the processing of personal data. Once the purpose for processing personal data ceases, unless another legal reason or basis (e.g. the retention of records for purposes of providing evidence in the event of a dispute arising in connection with the employment agreement) allowing the retention of the personal data exists, data will be deleted, destroyed or anonymized.

7. Principles Relating to Personal Data Privacy

Our company acts in accordance with the principles stated below in all data processing activities.

- **Acting in accordance with the law and in good faith**: Our company, during all kinds of personal data processing activities, acts in accordance with the applicable law and in good faith.
- **Authenticity and Being Up-to-date**: Our Company allows data subjects to update their personal data and take necessary measures to ensure that the transfer of data to databases are carried out correctly.
- **Processing for specific, clear and legitimate purposes**: Our company limits personal data processing activities to specific and legitimate purposes and informs data subjects clearly regarding the purposes via privacy notices.
- **Being relevant, limited and proportionate with the purposes**: Personal data processing activities of our Company are proportionate to, relevant and limited with the purpose stated at the time of collecting the personal data.

- **Retention as stated in the related law or as long as necessary for the relevant purpose:**
Where a retention time is specified in the law, our company preserves the Personal Data for that period. In case the Law does not specify any period, our company determines this period in accordance with the processing purpose and company procedures. At the end of the preservation period, in accordance with our company's procedures, personal data will be deleted, destroyed or anonymized.









8. The Use of CCTV (Closed Circuit Television)

When you visit our company premises, your visual and audial data may be obtained via CCTV and may be preserved only for a period necessary to fulfill the following purposes. With the use of CCTV, prevention and detection of any criminal act incompatible with the law and company policies, maintaining the security of company premises and equipment located within the premises, protection of visitors' and workers' well-being is pursued. All necessary technical and administrative measures will be taken by our company regarding the security of your personal data obtained via CCTV.

9. Rights of the Data Subjects

In accordance with Article 11 of the Law, data subjects are entitled to the following rights stated at Table 2 below:

Table 2 – Data Subject's Rights

	Learn whether data relating to 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 about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means.
	Demand compensation for the damages he/she has suffered as a result of an unlawful processing operation.

10. The Exercise of Rights by the Data Subjects

You may reach us via the communication channels mentioned in the “Questions and Opinions” section in order to use your rights mentioned above and convey the related requests to us easily. Data subjects’ requests concerning the above-listed rights shall be concluded by our Company 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, THY reserves its right to demand a fee from the tariff specified by the Board, in case the request requires additional costs.

Our Company may request certain information from the data subject in order to determine that the applicant is in fact the Data Subject, and additional questions can be directed to the applicant to clarify matters regarding the applications.

11. Data Security

Our Company takes all appropriate technical and organizational measures to safeguard your personal data and to mitigate risks arising in connection with unauthorized access, accidental data loss, deliberate erasure of or damage to personal data.




In this respect our Company;

- Ensures data security by utilizing protection systems, firewalls and other software and hardware containing intrusion prevention systems against virus and other malicious software,
- Access to personal data within our company is carried out in a controlled process in accordance with the nature of the data and within the framework of the authority on the basis of unit / role / practice,
- Ensures the conduct of necessary audits to implement the provisions of the Law, in accordance with Article 12 of the Law,
- Ensures the lawfulness of the data processing activities by way of internal policies and procedures,
- Applies stricter measures for access to special categories of personal data, in case of external access to personal data due to procurement of outsource services, our Company obliges the relevant third party to undertake to comply with the provisions of the Law,
- It takes necessary actions to inform all employees, especially those who have access to personal data, about their duties and responsibilities within the scope of the Law.

12. Questions and comments

In case you wish to convey your questions and comments regarding the Notice, you may contact us via:

Table – 3: Communication Information

	Türk Hava Yolları Genel Yönetim Binası Atatürk Havalimanı, Yeşilköy, 34149 İstanbul
	00 90 212 463 63 63
	00 90 212 465 21 21

13. Definitions

- **“Explicit consent”**: Consent that is provided for a specific subject, upon being informed and freely given.
- **“Anonymization”**: Rendering personal data by no means identified or identifiable with a natural person even by linking with other data.
- **“Related person/Data subject”**: Refers to the natural person whose personal data are processed.
- **“Personal data”**: Refers to any information relating to an identified or identifiable natural person.
- **“Special Categories of Personal data”**: Refers to data that has been subjected to a more stringent protection regime under the Law which may cause the Data Subject to be victimized or discriminated against in cases of disclosure or loss.
- **“Processing of personal data”**: Refers to any operation that is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system.
- **“Data recording system”**: Refers to the registration system in which personal data is configured and processed according to certain criteria.
- **“Data controller”**: The natural or legal person determining the purposes and means of the processing of personal data and who is responsible for the establishment and management of a data recording system.