

Gdpr Privacy Announcement for Employees and Contractors

1. Introduction

Türk Hava Yolları Anonim Ortaklığı (hereinafter referred to as “**THY**”, “**Company**”, “**Turkish Airlines**” or “**We**”), pays the utmost attention to the lawfulness of the processing of personal data of its employees. *GDPR Privacy Policy for Employees and Contractors*. (“**Privacy Policy**”) herein has been prepared in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”) to ensure that your personal data, as our employees, is processed in a transparent manner.

In this respect, as your employer/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.

This Privacy Policy also describes your data protection rights, including a right to object to some of the processing which THY carries out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

2. How Do We Collect Your Personal Data?

From the start of your employment relationship, your personal data can be collected via printed documents (e.g. CV information that you may provide or social security records), forms (e.g. recruitment form / periodic examination application form) and in some instances, through digital channels (e.g. information obtained directly from public institutions, or from the authorized hospitals of the Directorate General of Civil Aviation (“**SHGM**”), in some instances, through digital channels (e.g. information obtained directly from public institutions) to fulfil certain legal obligations or, where applicable, your documents can be sent to us by the recruitment agency you provided with your information. In any case, your personal data may only be collected and processed in accordance with applicable laws.

3. Which Personal Data Do We Collect & Process?

We collect and process the following types of personal data:

- Personal identification: and communication information: your name, home address, phone number, email address; nationality, photo, employee ID number, national insurance number and where applicable, information required to assess the eligibility of foreign duties (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).
- Application related information: curriculum vitae (CV), cover letter, employment history, education history, qualifications and skills, social media information, reference contact information, position preferences, willingness to relocate, desired salary, interests and aspirations, and background screening information if relevant. As well as collecting information from you directly, during the application process THY receives information relating to you from recruiters (e.g. recruitment agencies) and persons who you have named as referees.
- Location Data: Location data that are collected by company cars, cellphones or laptops that are provided for your use.
- Family, lifestyle and social circumstances information: Data collected about your family members and/or relatives where necessary for the provision of applicable benefits and for purposes such as to provide health insurance,

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emergency contacts, marital status, newborn or day-care financial supports, or to run operations regarding CED, ZED, PASS tickets.

- Employment related information: job title, compensation, benefits, bank details, professional experience, education, performance history, training records, accident records, expense records (such as details of out-of-pocket expenses, corporate credit cards, company cars or private cars where an allowance is claimed and mobile phone costs), information concerning performance, career plans, conduct and about violation of laws or breach of company policies
- Benefit-related information: medical leave information, medical certificates, other documents required to confer special benefit status, such as information concerning pregnancy status and age of children where applicable;
- Information about your use of our systems: for example, your use of our IT systems and electronic devices used by, or allocated to, you
- Sensitive information: for example, information about your health and disabilities where we need to make any reasonable adjustments, information about the anti-doping tests we run for our pilots and cabin crew members;
- To Comply with the legal obligations that we are subject to we may collect (personal data regarding security, such as passwords and account information that are created when you are accessing digital media or IP information of internet sites that you have accessed at the company premises and records of communications made with devices provided to you by THY for professional use.

4. Why Do We Process Your Personal Data and What is the Legal Basis for this Use?

THY will process your personal data for the following purposes:

- **Where this is necessary for THY to enter into or administer your contract of employment or for services or in connection with services or benefits which you request from us.**
 - To make informed decisions on recruitment and assess your suitability for the role to which you have applied.
 - To reimburse you for any agreed expenses incurred in the application process.
 - The administration of payroll and benefits, absences, mobility arrangements, compensation, and expense management.
 - To allow you to access medical insurance, occupational health, retirement plans, stock plans, access to company cars and automotive insurance, and childcare benefits, where provided. Some benefits may require you to provide personal data concerning family members, partners or next of kin, in which case you must inform them of how we use their personal data (including by providing this Policy) before providing their data to us.
 - To handle disciplinary matters and grievances.
- **Where necessary to comply with a legal obligation.**
 - Making deductions from payroll for tax and social security purposes and providing information to tax and social security authorities, as required by law.
 - Managing statutory sick pay and maternity pay.
 - To maintain statutory records such as health & safety records.

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- To comply with applicable laws, including, but not limited to, in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).
- **Where necessary for THY's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights.**
 - To improve our recruitment process and activities.
 - To verify the details you have supplied and conduct background checks both before and during your employment or engagement with us.
 - To manage, develop and communicate with our personnel - for example, performance and talent management, training and leadership development, award recognition, managing appraisals and employee tests and assessments, employee surveys and marketing to employees.
 - To develop more efficient and personalized working practices by studying patterns of work and performance
 - To arrange insurance and professional travel.
 - To enable and plan our business.
 - To ensure the quality of client support services.
 - To provide access to our offices and manage our IT systems and infrastructure.
 - To protect our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation).
 - Managing the performance and security of our equipment, facilities and electronic platforms. This includes administering access rights, monitoring compliance with information security and other company protocols, and where permitted by local law and in accordance with relevant policies, for investigations and disciplinary actions.
 - To monitor the location of the company vehicles and devices provided to employees.
 - To publish internal directories and providing other internal communications tools. This includes information which you provide for your internal company profile (including your photo).
 - To maintain records of your emergency contacts, such as your family members. You must inform them of how we use personal data (including by providing this Policy) before providing their data to us.
 - To conduct anti-doping testing for our pilots and cabin crew members.

THY has carried out a balancing test in order to determine what is in its legitimate interests and you can request information about this balancing test by contacting us using the details set out in the "*What Are Your Rights as Data Subjects*" below.

- **Where necessary for the purposes of carrying out obligations in the field of employment and social security and social protection law under local law (under Article 9(2)(b)(GDPR):** Information revealing race, trade union affiliation, ethnic origin, sexual orientation and any disability may be processed in order to facilitate effective equal opportunities monitoring and/or to comply with legal obligations to make reasonable adjustments.
- **Where you have given consent.** For example, we ask for your permission to use your image in a company publication. Where we ask for consent, you are free to withhold or revoke it.

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We may provide you with more specific Policy for some of the processing described above and, if we require your consent, will ask for this at the time we collect your personal data.

We will tell you if we require you to provide personal data to comply with legal or contractual obligations, in which case the provision of such data is mandatory: if such data is not provided, then we will not be able to manage the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional. Where you do not provide the relevant data for in these circumstances, the consequences will be explained to you at the time.

5. 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.

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

- **Our business partners or suppliers** residing within borders or abroad: Various suppliers, financial advisors, financial audit firms, benefits providers such as for the purpose of obtaining health or life insurance child care vouchers or other benefits, 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 carry out on behalf of THY.
- **Group companies:** 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/press-room/about-us/index.html>
- **Government authorities and/or law enforcement officials:** Your personal data can be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws (For example public and private bodies authorized by national and international law or national and international public institutions that may make decisions that affect the Company and / or the Company's operations; such as Directorate General of Civil Aviation ("SHGM"), International Air Transport Association ("IATA"), The Office of Foreign Assets Control ("OFAC"), Bureau of Industry and Security ("BIS"), Transportation Security Administration ("TSA")).
- In the event that the **business is sold or integrated with another business**, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

Where EU originated information is transferred outside the EEA (e.g. Turkey), and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review by contacting us using the details set out below.

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6. How long will you retain my data?










Where we process your personal data for employment related purposes for the course of the employment relationship you have with us and, to the extent permitted by applicable law, depending on the content of the personal data it may be up to 30 years after termination of employment.

Where we process personal data for marketing purposes or with your consent, we process the data [until you ask us to stop and for a short period after this (to allow us to implement your requests)]. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data [indefinitely] so that we can respect your request in future.

7. What are Your Rights as Data Subjects?



Where permitted by law you are entitled to a number of rights as shown in Table-1.

Table-1:Your rights as data subjects

	YOUR RIGHTS
	Learn whether data relating you is being processed.
	Request further information if personal data relating to you has been processed.
	Learn the purpose for the processing of personal data and whether data are being processed in compliance with such purpose.
	Request a copy of your personal data we hold.
	Learn to which third-party recipients your data is disclosed.
	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.
	Obtain the personal data you provided to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data to another controller.
	Object to negative consequences that you experienced as a result of analysis of the processed personal data by solely automatic means.

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	Object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing purposes).
	If you have unresolved concerns, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred.

Under the GDPR, these rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in the GDPR. We will inform you of relevant exemptions we rely upon when responding to any request you make.


In most cases we will not charge a fee for your requests. However, where the request is manifestly unfounded or excessive, we may charge a reasonable fee based on the administrative costs generated by your request.

8. Contact Information

If you have any concerns about how we process your data, or if you would like to opt-out of direct marketing, based on the laws applicable to you, you can reach out as shown in **Table 2**

THY HQ ENTITY	
	Türk Hava Yolları Genel Yönetim Binası Atatürk Havalimanı, Yeşilköy, 34149 İstanbul
	https://www.turkishairlines.com/en-int/any-questions/customer-relations/
	00 90 212 463 63 63

If you live in Germany and have an unresolved concern you can also contact our German DPO:

 +49 069 955171 22/53

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