

# EGİS TÜNEL İŞLETMECİLİĞİ ANONİM ŞİRKETİ

## Visitor Clarification Text in Relation to the Protection and Processing of Personal Data

### 1. Data Controller

Pursuant to the Personal Data Protection Law numbered 6698 (the “**PDPL**”), by this Clarification Text in Relation to the Protection and Processing of Personal Data (“**Clarification Text**”), we, as Egis Tünel İşletmeciliği Anonim Şirketi (“**ETİ**” and/or the “**Company**”), would like to inform you, our valued visitors, under our obligation to inform pursuant to the PDPL in our capacity as Data Controller.

Personal data under the PDPL means any and all information in relation to a real person, who is identified or identifiable (“**Personal Data**”), and Special Categories of Personal Data, which is a special type of this, means the data in relation to race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, attire, memberships to associations, foundations or unions, health, sexual life, criminal convictions and security measures and biometric and genetic data (“**Special Categories of Personal Data**”). In this context, the definition of Personal Data also includes your Special Categories of Personal Data.

Within the scope of this text, persons, who come to the headquarters or annexes of the Company to meet with the employees of Egis Tünel İşletmeciliği or to conduct work on behalf of Egis Tünel İşletmeciliği and the personal data of whom are processed at that time, qualify as visitors.

### 2. Method of Collection of Personal Data and the Legal Bases of Processing

Your Personal Data is collected, in connection with the transactions entered into with the Company and for the purpose and within the scope indicated in Section 4 below, by way of the information disclosed by you and via camera footage by automated or non-automated means, in electronic form.

- i. By way of camera recording located within the workplace office and the building,
- ii. By way of the records made by the visitors at the entrance of the building and the card given to them at the entrance of the building,

The legal bases set forth in articles 5 and 6 of the PDPL in relation to the processing of Personal Data are as follows:

- i. Your explicit consent,
- ii. Being explicitly provided for by the laws,
- iii. Being necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to express his/her consent due to the physical disability or whose consent is not deemed legally valid,
- iv. Processing of personal data in relation to the establishment or performance of an agreement,

- v. Being required for the fulfilment of our legal obligations,
- vi. Being made public by the data subject himself/herself,
- vii. Being required for the establishment, exercise or protection of a right, and
- viii. Provided that your fundamental rights and freedoms are not violated, being required for our legitimate interests.

### 3. Your Personal Data Collected

The Personal Data collected from you are the data processed for the purposes of processing indicated in Section 4 below.

### 4. Purposes of Processing of Personal Data

Your Personal Data are processed by the Company under the circumstances legally allowed under the PDPL for the purposes below:

- i. To create and follow up on the visitor records (ID information), (Legal basis: Fulfilment of our legal obligations, processing being required for the establishment, exercise or protection of a right, legitimate interest)
- ii. To provide the security of the physical site (ID information, physical site security information, transaction security information, visual and audio records), (Legal basis: Fulfilment of our legal obligations, processing being required for the establishment, exercise or protection of a right)
- iii. To inform authorized persons, institutions and organizations for the fulfillment of legal obligations and for complying with the requests by the authorized administrative institutions and judicial institutions (ID information, physical site security information, visual and audio records), (Legal basis: Fulfilment of our legal obligations, processing being required for the establishment, exercise or protection of a right)
- iv. Protection of the life or physical integrity of the person or another person (Taking temperature and HES code inquiry) (will not be transferred).

### 5. To Whom and For What Purpose Personal Data May be Transferred

The Company may transfer and/or make available your Personal Data within the country in accordance with your explicit consent or under other circumstances legally allowed (and for the purposes and within the scope of the legal bases specified in Clause 4) to service providers from which security services are received and to third parties from which support services are received in relevant other fields in relation to the activities of the Company (companies providing computing support, etc.) and to authorized institutions and organizations and official public institutions and organizations, and, if requested, to judicial authorities and relevant police forces for the purposes of resolution of legal disputes, fulfillment of obligations arising from legislation.

### 6. Rights of the Data Subject Under Article 11 of the PDPL

As data subject, you may request at any time from the Company, in its capacity as data controller, your rights specified below pursuant to article 11 of the PDPL.

In this regard, the rights you have are as follows:

- i. to learn whether any of the personal data is processed,
- ii. to request information in relation to the activities of processing of the personal data,

- iii. to learn the purposes of the processing of the personal data and whether these personal data are used in compliance with these purposes,
- iv. to be informed on the third parties, in case personal data are transferred to third parties within the country or abroad,
- v. in case personal data are processed incompletely or inaccurately, to request the rectification of such incomplete or inaccurate data and to request that the action taken in this regard be notified to the third parties to which personal data are transferred,
- vi. in case, even though the personal data are processed in compliance with the PDPL and other relevant provisions of law, the bases for processing cease to exist, to request the deletion, destruction or anonymization of the personal data within 30 (thirty) days pursuant to the provisions of the Regulation on Deletion, Destruction or Anonymization of Personal Data and to request that the action taken in this regard be notified to the third parties to which personal data are transferred,
- vii. to object to the unfavorable results which may occur as a result of processing of the personal data by automated means, and
- viii. in case you suffer any damages due to unlawful processing of the personal data, to request the compensation of the damage.

The requests specified above shall be conveyed to the Company in its capacity as data controller in writing or by way of other methods to be determined by the Personal Data Protection Board ("**Board**").

In this regard, you may deliver your request in relation to your above rights by using the e-mail address provided below, which may change from time to time, by using your registered electronic mail (REM) address, electronic mail address with secure electronic signature or mobile signature or the electronic mail address which was previously notified by you to the Company and which is registered in the Company's system (by attaching documents which identify you) or you may deliver by hand with an original-signed petition or send via notary your request to our mailing address, which, again is provided below and which may change from time to time by including documents which identify you.

The request, which you will make to use the rights specified above, which you have as a data subject, and which includes the explanations in relation to the right you request to use, the issue requested by you must be clear and comprehensible, the matter requested by you must pertain to you or, in case you are acting on behalf of another person, you must be specifically authorized and such authorization must be documents, the request must include your identity and address information.

The Company concludes the requests in the request form as soon as possible and at the latest within thirty days free-of-charge (in case there isn't any cost). However, in case the transaction requires an additional cost, the fee determined by the Personal Data Protection Board may be charged. In case the replies to the requests exceed 10 (ten) pages, a transaction fee of TL 1.00 (one) will be charged per page. In case the reply is requested in a recording medium such as a CD or flash disc, a fee will be requested as per the cost of the requested recording medium.

**Data Controller:** Egis Tünel İşletmeciliği Anonim Şirketi

**Mailing address:** Barbaros Mahallesi, Dr.Eyüp Aksoy Caddesi No:9 Üsküdar / İstanbul

**E-mail address:** kvkk@egis-turkey.com