

POLICY ON PERSONAL DATA OF SPECIAL NATURE

1-SCOPE AND DEFINITIONS

Policy is related to the personal data of special nature located at the systems where data is processed through fully or partially automated or not automated provided that it is a part of any data storage system.

2- PROCESSING PERSONAL DATA OF SPECIAL NATURE

As per article 6/1 of LPPD no 6698; 'data of the people related to race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership to foundations, association or union, health, sexual life, criminal conviction and data related to judicial measures and the biometric and genetic data' are personal data with special nature.

Data with special nature are processed under the terms below within the scope of 'Terms for Processing Personal Data with Special Nature' determined in article 6 of LPPD no 6698, with taking the measures determined by Personal Data Protection Board with regards to protection of these data:

- If the Personal Data Owner's Explicit Consent is present,
- If the Personal Data Owner's Explicit Consent is absent, the personal data other than Health and sexual life shall be processed under the terms foreseen in the law, the personal data related to Health and sexual life can only be processed under the legislation in cases where there is an obligation to protect public health, preventive medicine, medical diagnosis, treatment and caretaking services, planning and managing healthcare services and financing and also in cases where there is a confidentiality obligation.

3- DOMESTIC TRANSFERRING OF PERSONAL DATA OF SPECIAL NATURE

In accordance with the regulation provided for in Article 8 of the LPPD,

A) In cases where explicit consent is required, by obtaining explicit consent in accordance with Article 8, paragraph 1,

B) In case of the existence of one of the conditions mentioned in the second paragraph of Article 5, without explicit consent,

C) With taking sufficient measures, the Company may domestically transfer without explicit consent under the terms stated in paragraph 3 of article 6 as below;

- Personal data other than health and sexual life (race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, criminal convictions and security measures and biometric and genetic data) in conditions foreseen by law,
- The data relating to health and sexual life, only within the scope of processing by the authorized institutions and organizations and the persons under the obligation of keeping secret for planning and managing the financing planning and healthcare services and executing protective medicine, medical diagnosis, treatment and care services and protecting public health,

4. MEASURES FOR PROTECTING DATA OF SPECIAL NATURE

Pursuant to the Resolution of the Personal Data Protection Board dated 31/01/2018 and numbered 2018/10;

1- A separate systematic, manageable and sustainable policy and procedure for the security of private personal data has been determined.

2- For employees involved in the processing of Personal Data with Special Nature,

a) Regular training is provided in topics such as Laws and related regulations and Security of Personal Data with Special Nature,

b) Confidentiality agreements are made,

c) A clear definition of the scope and duration of authorization of users who have the authorization to access to data,

- d) Authorization checks are performed periodically,
- e) The authority of the employees who have changed their jobs or leave their jobs in this field is immediately removed and the inventory assigned to them by the COMPANY is returned,
- 3- If the medium where personal data with special nature are processes, maintained and / or accessed are electronic medium;
- a) Data is kept using cryptographic methods,
- b) Cryptographic keys are kept in secure and different environments,
- c) All transaction logs performed on the data are logged securely,
- d) The security updates of the data environments are continuously monitored, the necessary security tests are regularly conducted / performed, the test results are recorded,
- e) If the data is accessed through software, user authorizations for this software are performed, security tests of these software are performed regularly and test results are recorded,
- f) If remote access to data is required, at least two-level authentication system is provided,
- 4- If the medium where personal data with special nature are processes, maintained and / or accessed are physical medium;
- a) Sufficient security measures are taken according to the nature of the medium in which the Personal Data with Special Nature are stored (against electricity leaks, fire, flood, theft etc.)
- b) By ensuring the physical security of these environments, unauthorized entry and exit is prevented,
- 5- If Personal Data with Special Nature is going to be transferred;
- a) If the data is needed to be transferred via e-mail, it is ensured that they are transferred by using encrypted corporate e-mail address or Registered Electronic Email (REM) account,
- b) If it is needed to be transferred via media such as portable memory, CD, DVD, it shall be realized by cryptographic encoding and the cryptographic key shall be kept in a different environment,
- c) If it is transferred between servers in different physical environments, the performance of transferring data by establishing a VPN between servers or by using sFTP method,
- d) If data needs to be transferred via paper, necessary measures are taken against risks such as theft, loss or sighting of unauthorized persons and the documents are sent in "confidential documents" format.
- 6- In addition to the above-mentioned measures, technical and administrative measures to ensure the appropriate level of security specified in the Personal Data Security Guidelines published on the website of the Personal Data Protection Institution are also taken into consideration.