

KMO ANADOLU OTOYOL İŞLETMESİ A.Ş.
AVRUPA OTOYOLU YATIRIM VE İŞLETME A.Ş.
CLARIFICATION TEXT FOR EMPLOYEE CANDIDATE

The Clarification Text herein has been prepared, in relation to the use of personal data obtained from Personal Data Owners and/or third parties during the selection and evaluation process prior to recruitment, by **KMO ANADOLU OTOYOL İŞLETMESİ A.Ş. and AVRUPA OTOYOLU YATIRIM VE İŞLETME A.Ş.**, to inform and enlighten you transparently regarding the ways your personal data has been collected, the purposes and legal reasons of personal data processing activities, if the personal data is transferred the principles regarding this, and your rights as the data owner, pursuant to Law No. 6698 on the Protection of Personal Data (“LPPD”).

KMO ANADOLU OTOYOL İŞLETMESİ A.Ş. and AVRUPA OTOYOLU YATIRIM VE İŞLETME A.Ş. may update and change the provisions of this Clarification Text at any time by publishing it in other places. Updates and changes made by **KMO ANADOLU OTOYOL İŞLETMESİ A.Ş. and AVRUPA OTOYOLU YATIRIM VE İŞLETME A.Ş.** will be effective as of the date of publication.

Pursuant to LPPD, your personal data which you have shared as employee candidate will be able to be collected and processed by the Company determined as the Data Controller within the scope specified below.

1. DEFINITIONS and SHORTCUTS

Within this Clarification Text following words indicate;

Company	: KMO ANADOLU OTOYOL İŞLETMESİ A.Ş. AVRUPA OTOYOLU YATIRIM VE İŞLETME A.Ş. resident at the address Rumeli Feneri Cad. No: 280 Garipçe Mah. 34450 Sarıyer/İSTANBUL
Personal Data	: All kinds of information about an authenticated or can be authenticated natural person
Processing of Personal Data	: All kinds of operation performed on the data such as obtaining, saving, storing, preserving, changing, reorganizing, explaining, transferring, taking over, making available, classifying personal data in a fully or partially automated way or non-automated way provided that it is part of any data recording system,
Owner of Personal Data	: Natural person whose personal data has been processed,
KVKK	: Law No. 6698 on the Protection of Personal Data, which entered into force after it has been published in the Official Gazette dated April 7, 2016.
Employee Candidate	: Natural person included in the process of selection and placement by the Company in order to establish a labour contract with the Company
Data Processor	: Natural and legal persons outside the organization of data controller, who processes personal data on behalf of data controller, based on the authority given by him.

Data Controller : Natural and legal person, responsible for establishment and management of data recording system, who determines purposes and instruments of processing personal data.

2. PROCESSED PERSONAL DATA

Along with the fact that types and numbers of your processed personal data will vary depending on the relationship you have with the company; your personal data which you have shared with the company or that the Company obtained from the third parties, is categorized below:

Personal Data Categories	Personal Data We Obtained
Identity Data	Name-surname, TR Identity number, mother's-father's Name, driving licence, place and date of birth, marital status
Visual Data	Biometric photograph
Contact Data	Mobile and home telephone number, e-mail address, reference information
Location Data	Home and Work address
Professional Experience	Work experiences

3. GENERAL PRINCIPLES RELATED TO PROCESSING PERSONAL DATA, TERMS AND PURPOSES OF PROCESSING PERSONAL DATA

Your personal data has been processed in accordance with the general principles determined by Article 4 of LPPD, in accordance with law and good faith, accurately and updated when necessary, for specific, clear and legitimate purposes, linked to the purpose for which they were processed, limited and restrained and being kept during the time stipulated in the relevant legislation or during the time required for the purpose for which they were processed.

Personal data cannot be processed without the explicit consent of the Personal Data Owner pursuant to Article 5 of LPPD. However, according to the same article provision, in case one of the following conditions exists, it is possible to process personal data without seeking the explicit consent of the Data Owner:

- If being stipulated in the Law,
- If a person, who is unable to disclose his/her consent due to de facto impossibility, or whose consent is not legally valid, is obliged to protect one's own life or someone else's life or body integrity,
- If it is necessary to process personal data of the contracting parties, provided that it is directly related to the establishment or performance of a contract,
- If it is mandatory for the Data Controller to fulfil his/her legal obligations,

- If the personal data is publicized by the Data owner himself/herself,
- If data processing is mandatory for the establishment, use or protection of a right,
- If data processing is mandatory for the legitimate interests of the Data Controller, provided that it does not harm the fundamental rights and freedoms of the Owner of Personal Data.

The Company processes your personal data subject to this Disclosure Text herein, for the purposes of evaluating job applications correctly, running candidate application and recruitment processes in accordance with Company policies and legislation, fulfilling obligations arising from the law, and planning administrative and personnel affairs.

Moreover, your personal data may be used by the Company for security purposes and/or to protect the legitimate commercial interests of the Company or to prevent or investigate suspected or actual violations of the law, violations of working conditions or non-compliance with the Company's business principles or Company policies.

As long as permitted with the above purposes and relevant laws, if information supporting the doubts regarding violation of the Company's general principles or policies or other relevant laws during employment relationship, following measures may be taken:

- To access, research, monitor and archive the data and messages which have been sent, accessed, displayed or stored (including those sent from corporate email);
- To investigate phone records;
- To track physically, by video or electronically, to search work environment (e.g. file cabinet, desks and offices even if they're locked.)
- To disclose the information obtained in the searches pointing to possible illegal behaviour to law enforcement officers.

Lastly, your personal data may also be recorded via video or other electronic, digital or wireless tracking system or device (e.g. CCTV, key access systems) due to security reasons.

4. COLLECTION METHODS OF PERSONAL DATA and LEGAL REASONS

Your personal data may be collected, processed and transferred by the Company, in accordance with the basic principles stipulated by LPPD, within the scope of personal data processing terms specified in Articles 5 and 6 of LPPD, for the purposes specified in this Disclosure Text, herein, with the channels such as;

- Submitting applications by you via digital ways,
- Submitting applications by you via physical ways.

Your personal data subject to this Clarification Text herein is obtained and processed due to the legal reasons that they are required for the legitimate interests of the Data Controller and that your explicit consent has been observed.

5. TRANSFER OF PERSONAL DATA, TRANSFER PURPOSES AND DURATIONS

Your personal data within this Clarification Text herein are by no means transferred outside the company and retention periods of your personal data are given below.

Personal Data Categories	Institutions Where Transferred	Transfer Purposes	Retention Period
Identity Data	Social Security Institution, Police Station.	Transferred for the purpose of executing security processes and fulfilling the obligations arising from law.	10 years as of the application has reached to the Company.
Visual Data	Social Security Institution, Police Station.	Transferred for the purpose of executing security processes and fulfilling the obligations arising from law.	10 years as of the application has reached to the Company.
Contact Data	Social Security Institution, Police Station. (Except reference information)	Transferred for the purpose of executing security processes and fulfilling the obligations arising from law.	10 years as of the application has reached to the Company.
Location Data	Social Security Institution, Police Station.	Transferred for the purpose of executing security processes and fulfilling the obligations arising from law.	10 years as of the application has reached to the Company.
Professional Experience	No transfer is made.		5 years as of the application has reached to the Company.

6. SECURITY OF YOUR PERSONAL DATA

The Company takes appropriate measures that are consistent with relevant privacy and data security laws and regulations in order to protect your personal data and depending on the state of technology, application costs and content of the data to be protected, it implements technical and institutional measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure or unauthorized access to your data.

Personal data subject to this Clarification Text herein are kept accessible only to limited people within the company. These personal data will be deleted, destroyed or anonymized at the end of the processing period as indicated in the company's Personal Data Processing, Retention and Disposal Policy.

7. RIGHTS AND OBLIGATIONS OF THE PERSONAL DATA OWNER

Employee candidates are responsible for ensuring that the personal data they share with the Company are accurate, complete and up-to-date, and if personal data belonging to other people are shared, they are responsible for collecting these data in a valid manner and in accordance with the legislation.

The employee candidate will inform other people who provide their personal data to the Company about the content of this Notice and the candidate is obliged to obtain their consent regarding their personal data to be used by the Company as specified in this Notice (including transfer and disclosure).

Within the scope of LPPD and relevant legislation, personal data owners have the rights below;

- To learn whether their personal data has been processed or not,
- If personal data has been processed, to request information about that,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the people to whom personal data have been transferred domestically or abroad,
- In case of missing or incorrect processing, to request correction of personal data, and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred,
- To request the deletion or destruction of personal data if the reasons that require processing disappear although it has been processed pursuant to the provisions of Law No. 6698 and other relevant laws.
- To object to the emergence of a result against the person himself/herself by analysing the processed data exclusively through automated systems,
- To request the indemnification of the loss, in case he/she suffers a loss due to processing of personal data in violation of law.

As Personal Data Owners, you can submit your application, which includes your requests regarding your rights, clearly and understandably and by adding documents identifying credentials and address information; by hand with written and wet signature, by mail or through a notary public to the Data Controller Company's **Rumeli Feneri Cad. No: 280 Garipçe Mah. 34450 Sarıyer/İSTANBUL** address or to kmoanadolu@hs03.kep.tr , avrupaotoyolu@hs03.kep.tr PTT KEP addresses.

The company has the right to verify your identity before responding and it is mandatory to have the following in your application;

- Your name, surname and if the application is written, your signature,
- For Turkish citizens your TR Identity number, if you are foreigner your passport number and identity card number if any,
- Residential area subject to notification or work address,
- E-mail address subject to notification if any, phone number and fax number,
- Subject of your request,

And information and documents relevant to the subject if any should be added to the application. If you forward your requests to the Company as stated above, the Company will finalize the request as soon as possible depending on the nature of the request and within thirty days at the latest.

COMPANY CONTACT INFORMATION: 0212 338 74 00

I have read, understood.

Name-Surname

Signature

Date

Reference Commitment

I undertake that it can be contacted with the people I have specified as reference for reference control and that necessary information has been provided/permissions have been obtained regarding sharing personal data with **KMO ANADOLU OTOYOL İŞLETMESİ A.Ş. ve AVRUPA OTOYOLU YATIRIM VE İŞLETME A.Ş..**

Name-Surname:

Signature:

Date: