


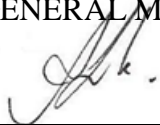
ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	1 / 21

NTSS EĞİTİM VE DANIŞMALIK LTD. ŞTİ.

DATA PROTECTION POLICY


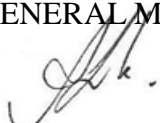
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QUALITY MANAGEMENT SYSTEM

PREPARED MANAGEMENT REPRESENTATIVE 	APPROVED GENERAL MANAGER 
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ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	2 / 21

REVISION CARD		
REVISION SUMMERY	Revision No	Revision Date
Policy has changed as per new Turkish Personal Data Protection Act 6698 and its regulations.	1	17.07.2018
Typos are corrected.	2	13.10.2018
Address and contact info changed	3	01.08.2019
The arrangements have been made according to the membership information on the new website.	4	08.08.2019

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	3 / 21

1. PURPOSE

As NTSS Eğitim ve Danışmanlık Ltd. Şti., it is our priority to process personal data of our members, customers, visitors, suppliers and real persons including our employees in accordance with Turkish Constitution and international conventions regarding human rights to which the country is a party as well as applicable legislation in particular Personal Data Protection Act no. 6698 (“PDPA”) and ensuring that Data Subjects whose data are processed exercise their rights efficiently.

Thus, we perform transactions related to processing, storage and transfer of all personal data we obtain on including but not limited to our employees, suppliers, customers, visitors, members, users who visit our website in accordance with NTSS Eğitim ve Danışmanlık Ltd. Şti. Data Protection Policy for Protection and Processing of Personal Data during our operations.


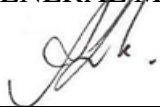
Protection of personal data and taking care of essential rights and freedoms of real persons whose personal data are collected is basic principle of our policy regarding processing of personal data. For this reason, we maintain all our operations where personal data are processed by taking care of the rights protecting confidentiality of private life, confidentiality of communication, freedom of opinion and belief, seeking effective remedies.

We take any administrative and technical protection measures required by quality of relevant data for protection of personal data in accordance with legislation and cutting edge technology.

This present Policy explains methods we follow regarding processing, storage, transfer or erasure or anonymization of personal data shared during commercial or social responsibility and similar operations under principles set forth at the PDPA.

2. SCOPE

All personal data processed by the Company also including our customers, our visitors,

PREPARED MANAGEMENT REPRESENTATIVE 	APPROVED GENERAL MANAGER 
---	--

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	4 / 21

business contacts, business associates, employees, suppliers, members, third parties fall under scope of the Policy.

The Policy is implemented during operations intended for processing of all personal data held or managed by the Company; it was handled and drafted paying attention to PDPA and other applicable legislation regarding personal data and international standards in this field.

3. DEFINITIONS and ABBREVIATIONS

Specific terms and expressions, concepts, abbreviations, etc. mentioned in the Policy are shortly described in this section.

NTSS, shall mean NTSS Eğitim ve Danışmanlık Ltd. Şti.

Explicit Consent, shall mean approval related to a particular subject, based on being informed and free will, leaves no room for doubt, granted only limited to such transaction.

Anonymization, shall mean rendering personal data which cannot be associated with a real person who is identified or identifiable under any circumstances even by matching with other data.

Employee, shall mean NTSS Staff.



Data Subject (Personal Data Owner), shall mean real person whose personal data are processed.

Personal Data, shall mean any information regarding a real person who is identified or identifiable.

Sensitive Personal Data, shall mean data of people about their race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, dress, association, foundation or trade union membership, health, sexual life, penal conviction and security measures as well as biometric and genetic data.

Processing Personal Data, shall mean any transaction performed on data such as obtaining, recording, storing, keeping, modifying, reorganizing, disclosing, transferring, taking over, rendering obtainable, classifying or preventing use of personal data in whole or in part automatically or non-automatically provided it is part of any data recording system.

Data Processor, shall mean any real or legal person who processes personal data on behalf of Data Controller based on authority granted by Data Controller.

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	5 / 21

Data Controller, shall mean any real or legal person who designates purposes and means for processing personal data, responsible for establishment and management of data record system.

PDP (KVK) Board, shall mean Personal Data Protection Board.

PDP Authority (KVKK), shall mean Personal Data Protection Authority in Turkey.

PDP Act, shall mean the Personal Data Protection Act (no 6698) published at the Official Gazette dated 7 April 2016 and no. 29677.

Policy, shall mean NTSS' Data Protection Policy for Protection and Processing of Personal Data.

DPO, shall mean Data Protection Officer

4. ROLES AND RESPONSIBILITIES

4.1. The Board

The Board is responsible for top supervision of designation and operation of mechanisms for report, review and sanction in the event of failure to comply with the Policy, rules and arrangements.

4.2. The Executive Board

Data Protection Policy has also been approved by the Executive Board.



It is authorized approval mechanism for creation, implementation of the Policy and ensuring update as and when necessary.

The Executive Board shall be responsible in operations it is responsible for taking measures necessary for compliance with the Policy of employees who take part as well as firms to whom services are outsourced,

Review of subjects for the purpose of matters against the Policy and reporting the same to the Board.

4.3. Data Protection Officer

Data Protection Officer shall be responsible for drafting, improving, executing and updating this present Policy. He shall evaluate this Policy when necessary with respect to its currency and needs for improvement. Posting the document drafted at KVK Boards' portal (VERBİS) is under responsibility of the Data Protection Employee.

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	6 / 21

5. LEGAL OBLIGATIONS

Pursuant to the PDP Act, legal obligations under protection and processing of personal data as Data Controller are listed as follows:

5.1. Our obligation of clarification

When we collect personal data as Data Controller, we are under obligation of clarifying the Data Subject on the following matters:

- a) For what purpose your personal data will be processed,
- b) Our identity, information about identity of our representative, if any,
- c) To whom your processed personal data can be transferred and for what purposes,
- d) Our method of data collection and its legal reason,
- e) Rights arising from the law,

We, as a Company, take care that this present Policy open to public is explicit, comprehensible and easily accessible.

5.2. Our obligation of ensuring data security

As Data Controller, we take administrative and technical measures stipulated at the legislation for ensuring security of personal data held by us. Obligations regarding data security and measures taken are detailed at sections 9 and 10 of this present Policy.

6. CLASSIFICATION OF PERSONAL DATA

6.1. Personal Data



Personal Data is any information about a real person who is identified or identifiable.

Personal Data protection is only related to real persons, information on legal persons that does not contain information about real persons are left out of personal data protection. For this reason, this present Policy is not applicable on data of legal persons.

6.2. Sensitive Personal Data

Data of people about their race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, dress, association, foundation or trade union membership, health, sexual life, penal conviction and security measures as well as biometric and genetic data of people are sensitive personal data.

7. PROCESSING PERSONAL DATA

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	7 / 21

7.1. Our principles for processing personal data

We process personal data as per the following principles;

7.1.1. Fairness and Lawfulness Processing

We process personal data in fairness and lawfulness, transparently and under our obligation of clarification.

7.1.2. Ensuring that personal data are correct and current when necessary

In order to ensure that data processed are correct and current, we take necessary measures in our data processing procedures. We allow a Data Subject to update his/her data and apply to us for correction of mistakes at his/her data processed, if any.

7.1.3. Processing for specific, explicit and legitimate purposes

As the Company we process personal data under legislation whose scope and contents are explicitly designated and within legitimate purposes designated to maintain our operations in the scope of ordinary course of commercial life.

7.1.4. Personal data being related to purpose for which they are processed, limited and moderate


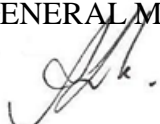
We process personal data related to the purpose which is designated as explicit and definitely, as limited and moderately.

We avoid processing personal data which are not relevant or processing of which is not needed. For this reason, as long as there is no legal requirement, we do not process sensitive personal data or in case of need to process we obtain explicit consent for the subject.

7.1.5. Storing personal data as stipulated by legal regulations and during our commercial legitimate interests

Several regulations in the legislation require storage of personal data for a specific period of time. For this reason, we store personal data we process for time as stipulated by applicable legislation or as much as time necessary for the purposes of processing personal data

In the event of expiry of storage time stipulated at legislation or disappearance of

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	



ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	8 / 21

purpose of processing, we erase, destroy or anonymize personal data. Our principles and procedures regarding retention periods are detailed at article 9.1. of this present Policy.

7.2. Our purposes for processing personal data

We, NTSS, process personal data under below-listed purposes:

- Carrying out our Training and Consultancy operations,
- Providing support service under contract and in the framework of service standards,
- Identifying preferences and needs of our members/visitors and shaping, updating services we provide in this scope,
- As dictated or required by legal regulations, ensuring fulfillment of our legal obligations,
- Being able to carry out market researches and statistical studies,
- Evaluating job applications,
- Ensuring contact with people who are in a business relationship with the Company,
- Marketing,
- Advising our members and customers about our bulletins, new trainings and schedules
- Compatibility management,
- Vendor / supplier management,
- Legal reporting,
- Invoicing,
- Making reportings necessary for certification of our customers who receive training from e-learning platform and sharing customer details with accreditation bodies.
- Managing membership processes through social networks,
- Ensuring corporate communication,
- Offering person-specific appropriate job advertisement and information related

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	9 / 21

to employment,

7.3. Processing sensitive personal data

Sensitive personal data are processed by us taking administrative and technical measures stipulated by the laws and stipulated by the PDP Board and if there is explicit consent, or in the events required by the legislation.

Sensitive personal data related to health and sexual life can be processed for the purposes of protecting public health, preventive medicine, medical diagnosis, carrying out treatment and care services, healthcare services as well as planning and management of their financing by persons or authorized agencies and organisations under obligation of keeping secret, therefore they are not processed by us other than data of our employees. Such data belonging to our employees can be processed by persons stipulated by the laws.

7.4. Processing personal data collected via cookies



We use cookies for improving mode of operation and use of our webpages. In addition to these, we take advantage of some cookies for remembering preferences you made at our websites and thanks to this we provide you with improved and personalized experience.

Starting training at e-training platform from any time paused is made by means of such cookies.

We can collect your personal data via cookies included in our digital platforms; we can process, transfer or retain data we collect.

7.5. Processing personal data for the purposes of human resources and employment

We process, retain and transfer your personal data included at your resume, diploma, etc. other documents you shared with us in the process of applications you file as an employee candidate for the purpose of assessing job applications. Processing, transfer

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	10 / 21

and retention of personal data you share as an employee candidate fall under scope of this present Policy.

Personal Data of an employee are collected processed and retained under SGK legislation besides this present Policy.

7.6. Processing personal data collected under other memberships ensured via

www.ntss.com.tr

In order to become a member via www.ntss.com.tr visitors share their;

First Name

Last Name,

GSM Phone,

Address,

Electronic mail address,

with us and create a membership in the system.



Addition to the membership information, the date and time of membership, and the IP number are recorded.

Erasure, destruction or anonymization of personal data under this platform falls under article 9 of this present Policy.

7.7. Processing personal data collected under sale of e-learning training service provided via www.ntss.com.tr.

E-learning trainings are sold with credit card or bank transfer via www.ntss.com.tr.

The National ID and date of birth information requested by the accreditation companies to issue certificates which must be updated by the member in the membership system.

PREPARED MANAGEMENT REPRESENTATIVE 	APPROVED GENERAL MANAGER 
---	--

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	11 / 21

Apart from these fields, members paying by credit card share their credit card information. NTSS provides services from İyzico, an institution approved by the BDDK for credit card related transactions. The financial information collected are processed for the purposes of the sales process in relation to the products and services purchased. If purchased through the digital portal, www.ntss.com.tr, the financial information of the member is transferred to the İyzico system for the execution of the transaction and the card holder is secured with 3D secure.

Details of transferred data regarding payment purposes like

Card Holder's Name and Surname,

Credit card number;



Expiry date,

CVV2,

or bank account details.

During purchase, data like invoice and payment details of the member (first name, last name, invoice address), invoices sent to member and copies of bank receipts of payments received from members, payment number, invoice amount, invoice number, invoice issue date are received. Such data are processed for managing invoicing process, accounting, aftersales services, communication, marketing, audit, control, processes executed with payment service providers. When purchase is made, financial information of member is transferred to legal persons like bank or credit card companies for executing the transaction. Credit card details are not retained at www.ntss.com.tr databases.

The above data are transferred and shared with 3rd parties as per article 8 of this present Policy.

PREPARED MANAGEMENT REPRESENTATIVE 	APPROVED GENERAL MANAGER 
---	--

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	12 / 21

Erasure, destruction or anonymization of personal data under this platform falls under article 9 of this present Policy.

7.8. Processing personal data collected under of e-learning training service provided via www.ntssakademi.com.

E-learning trainings are provided to our customers via www.ntssakademi.com. Upon signing in, user details are copied from www.ntss.com.tr when sale transaction is completed.

In this medium all training activities of students are recorded, log in and log outs to & from the website, tests taken and their results are also included. Such information can be rendered accessible to accreditation bodies abroad in case they are requested by such bodies issuing certificates regarding training provided or can be reported.



Erasure, destruction or anonymization of personal data under this platform falls under article 9 of this present Policy.

7.9. Exceptional circumstances where explicit consent is not sought for processing personal data

We can process personal data without obtaining explicit consent in case of following exceptional circumstances arising from the law:

- a) Explicitly stipulated by laws;
- b) Necessity of processing personal data of contracting parties provided it is directly related to conclusion or performance of a contract;
- c) Data processing is required for establishment, use or protection of a right;
- d) As Data Controllers, processing your data is required for our legitimate interests provided not harming essential rights and freedoms.
- e) Exceptional circumstances where sensitive personal data can be processed without explicit consent of Data Subject are set out at article 7.3. of this present Policy.

8. TRANSFERRING PERSONAL DATA

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	13 / 21

8.1. Transferring personal data domestically

NTSS acts in accordance with resolutions and regulations stipulated by PDPA and adopted by the PDP Board on the subject of transferring personal data.

Provided that exceptional circumstances set out at the legislation are reserved, personal data and special quality data may not be transferred by us to other real persons or legal persons without explicit consent of Data Subject.

In exceptional circumstances stipulated by PDPA and other legislation, data can be transferred to authorized administrative or judicial agencies or organisations as stipulated at legislation and subject to limitations without explicit consent of Data Subject.

Further, in exceptional circumstances stipulated by legislation and;



In circumstances detailed at article 7.9. of the Policy;

In circumstances listed at article 7.3. of the Policy regarding sensitive personal data, can be transferred without seeking explicit consent, upon taking measures stipulated by PDP Board and applicable legislation, while sensitive personal data related to health and sexual life of Data Subject can be transferred to persons or authorized agencies and organisations under obligation of keeping secret for the purposes of protecting public health, preventive medicine, medical diagnosis, carrying out treatment and care services, healthcare services as well as planning and management of their financing.

8.2. Transferring personal data overseas

As a rule, personal data cannot be transferred overseas without explicit consent of Data Subject. However, in cases where one of exceptional circumstances set forth at articles 7.3. and 7.9. of this present Policy are present, personal data can be transferred abroad without explicit consent if third parties located abroad are located at a country where adequate protection announced by the PDP Board.

In the event they are located in countries without adequate protection, Data Controllers in Turkey and in foreign country in question undertake adequate protection in writing and presence of permission from the PDP Board.

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	14 / 21

8.2.1. Transferring personal data overseas for the purposes of providing our services and marketing activities

Names of our students who successfully complete our face to face or in e-learning platform trainings subject to certificates approved by international accreditation bodies are shared with accreditation bodies based in the United Kingdom for issuance of certificates.

Names of students who will take exams after the trainings will be shared with accreditation bodies based in the United Kingdom.

8.3. Agencies and organizations to whom personal data are transferred

Personal Data can be transferred to;

- a) Training Accreditation Firms
- b) Legally authorized governmental agencies and organizations,
- c) Legally authorized private law persons,



according to above detailed principles and rules.

8.4. Measures we take regarding transfer of personal data in conformity with the law

8.4.1. Technical measures

In order to protect personal data, including but not limited to the following;

- a) We make intra-company technical arrangements for processing and retaining personal data in accordance with legislation,
- b) We create technical infrastructure to ensure security of databases where your personal data will be retained,
- c) We follow processes of technical infrastructure created and perform audits,
- d) We determine procedures about reporting technical measures we take and audit processes,
- e) We periodically update and renew technical measures,

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	15 / 21

- f) Risky situations are examined anew and necessary technological solutions are generated,
- g) We use virus protection systems, firewall and similar software and hardware security products and install security systems in line with technological advances,
- h) We employ employees, who are experts in technical subjects.

8.4.2. Administrative measures

In order to protect your personal data, including but not limited to the following;


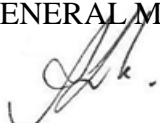
- a) We establish policies and procedures for accessing personal data, company and subsidiary employees in the Company are also included,
- b) We inform and train our employees regarding protecting and processing personal data in compliance with the law,
- c) In contracts we make with our employees and/or Policies we establish, we record measures to be taken in case personal data are processed by company Employees against the law,
- d) We audit personal data processing activities of data processors with whom we collaborate.

9. RETAINING PERSONAL DATA

9.1. Retaining personal data for the time stipulated at applicable legislation or necessary for the purpose they are processed for

We store personal data we process for time required by purpose of processing personal data provided that retention periods stipulated at legislation are reserved.

In cases we process personal data for multiple purposes, should purposes of data processing disappear or there is no obstacle in legislation for erasure of data upon request of Data Subject, data will be erased, destroyed or retained by anonymizing the same. We follow legislative provisions and resolutions of the PDP Board in the matters of destruction, erasure or anonymization.

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	16 / 21

9.2. Measures we take regarding personal data retention

9.2.1. Technical measures

We create technical infrastructures for erasing, destroying or anonymizing personal data and audit mechanisms regarding the same,

We take necessary measures for retaining personal data securely,

We employ employees with technical expertise,

We create job continuity and emergency plans against risks that may arise and develop systems regarding implementation of the same,

We install security systems as per technological advances regarding fields of retaining personal data.

9.2.2. Administrative measures

We create awareness by advising our employees about technical and administrative risks related to personal data retention,


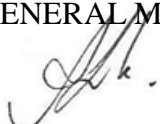
In the event of collaboration with third parties with personal data retention, we include necessary provisions into contracts made with companies to whom personal data are transferred related to taking security measures by people to whom personal data are transferred for the purpose of protecting secure retention of personal data transferred.

10. SECURITY OF PERSONAL DATA

10.1. Our obligations related to security of personal data;

We take administrative and technical measures based on technological opportunities and implementation costs to

- a) prevent unlawful processing,
- b) prevent unlawful access,
- c) ensure lawful retention.

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	17 / 21

10.2. Measures we take to prevent processing of personal data unlawfully

The company carries out and makes carried out necessary audits within the Company,

We train and inform our employees about processing personal data lawfully,

Operations carried out by the Company are evaluated in detail specific to all business units, as a result of such evaluation, we process personal data specific to commercial operations carried out by relevant units,



In cases of collaboration with third parties for the purpose of processing personal data, we include provisions regarding that persons processing personal data will take necessary security measures into contracts made with companies that process personal data,

In the event of disclosure of personal data unlawfully or data leakage, we notify the PDP Board of this situation and perform reviews stipulated by legislation on such matter and take measures.

10.2.1. Technical and administrative measures taken to prevent unlawful access to personal data

In order to prevent unlawful access to personal data:

- a) We employ employees with technical expertise,
- b) We periodically update and renew technical measures,
- c) We create access authorization procedures within the company,
- d) We determine procedures about reporting technical measures we take and audit processes,
- e) We create data recording systems used within the company in compliance with legislation and carry out audits periodically,
- f) We establish emergency assistance plans against risks that may arise and develop systems regarding implementation of the same,

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	18 / 21

- g) We train and inform our employees on the matters of access to personal data, authorization,
- h) In cases of collaboration with third parties for the purpose of activities like processing retaining personal data, we include provisions regarding that persons having access to personal data will take necessary security measures into contracts made with companies that provide access to personal data,
- i) We install security systems within technological advances in order to ensure preventing unlawful access to personal data.

10.2.2. Measures we take in case of unlawful disclosure of personal data



We take administrative and technical measures for preventing unlawful disclosure of personal data and update these in accordance with our relevant procedures. We create systems and infrastructures to notify Data Subject and the PDP Board if we determine unlawful disclosure of personal data.

In the event of unlawful disclosure despite all administrative and technical measures taken, this may be announced at website of the PDP Board or with another method if deemed necessary by the PDP Board.

11. RIGHTS OF DATA SUBJECT

Under our obligation of clarification, we advise Data Subject and establish systems and infrastructures regarding such advice. We make technical and administrative arrangements necessary for Data Subject exercising his rights regarding his personal data.

- a) Data Subject has the following rights over his personal data;
- b) Learning whether his personal data are processed,
- c) If personal data are processed, requesting information regarding this,
- d) Learning purpose of processing personal data and whether these are used in conformity with the purpose,
- e) Knowing third parties to whom personal data are transferred domestically or overseas,
- f) If personal data are processed incompletely or wrong, asking correction of the same,

PREPARED	APPROVED
MANAGEMENT REPRESENTATIVE	GENERAL MANAGER
	

ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	19 / 21

- g) Requesting erasure or destruction of personal data in the event reasons necessitating personal data processing disappear,
- h) Requesting notification of above-mentioned correction, erasure or destruction transactions to third parties to whom personal data are transferred,
- i) Disputing unfavorable results via analysis of processed data exclusively by means of automatic systems,
- j) Demanding rectification of damage in case of incurring damage because of processing personal data unlawfully.

11.1. Exercising rights regarding personal data

Data Subject may send his request related to his personal data with such method in case a separate method is designated by the PDP Board or to the address “Koru Mah. Ihlamur Cd. Tuğberk Sitesi No: 15 / 47 Çayyolu Çankaya / ANKARA - TURKEY” in writing and with wet-ink signature.



In the application filed by Data Subject to exercise above-mentioned rights and containing explanations regarding right he requests to use, the matter requested must be clear and comprehensible, the subject demanded must be related to person of the applicant or if one acts on behalf of another, he must be specially authorized in the subject and such authorization must be certified, further it must contain personal particulars and address details of the applicant and documents authenticating identification must be attached to application.

Such demands will be made individually, demands by unauthorized third parties about personal data will not be taken into review.

11.2. Evaluation of application

11.2.1. Answering time for application

Demands regarding personal data will be concluded as soon as possible according to qualification and in any case within no later than 30 (thirty) days at

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ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	20 / 21

no charge or in consideration of tariff rate if conditions in the tariff to be published about rate by the PDP Board emerge.

Additional information and documents may be requested during application or when evaluating application.

11.2.2. Our right to refuse application

Applications related to personal data will be refused under the following circumstances by providing justification;



- a) Processing personal data for purposes like research, planning and statistic by anonymizing with official statistics,
- b) Processing personal data for art, history, literature or scientific purposes or in the scope of freedom of expression provided that right of privacy or personal rights are not violated or crime is constituted,
- c) Processing personal data which are made public by Data Subject,
- d) Application is not based on a just cause,
- e) Application contains a request against applicable legislation,
- f) Failure to follow application procedure.

11.3. Procedure for application evaluation

Demands made must be sent in writing and with wet-ink signature or electronic signature and via KEP or you must send with information and documents authenticating identification of applicant via other methods designated by the PDP Board so that answering time set forth at article 11.2.1 of this present Policy can start.

If demand is accepted, relevant transaction is implemented and notification is made in writing or electronically. In case of demand denial, applicant will be informed in writing or electronically by stating grounds.

11.4. Right of complaint to Personal Data Protection Board

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ntss	DATA PROTECTION POLICY	DOCUMENT NO	PO-03
		PUBLISH DATE	05.01.2015
		REV. NO	04
		REV. DATE	08.08.2019
		PAGES	21 / 21

In the events of application denial, answer given is found insufficient or answer is not given in due time; applicant will be entitled to submit complaint to the PDP Board within 30 (thirty) days from date of learning answer and in any case within 60 (sixty) days from application date.

12. PUBLICATION AND RETENTION OF DOCUMENT

This present Policy will be retained in two different media, hard copy and electronic medium.

13. UPDATE PERIOD

This present Policy will be reviewed minimum once a year and in case of need it will be updated under principles designated at Documentation Management Procedure.

14. EFFECT

This present Policy will be deemed effective after being posted at Company website.

15. REPEALING

In case a resolution for repealing is adopted, obsolete copies of this present Policy with wet-ink signature will be retained for a period of 5 years.

Contact details for your questions about this present Policy:



NTSS Eğitim ve Danışmanlık Ltd. Şti.

Address: Koru Mah. Ihlamur Cd. Tuğberk Sitesi No: 15 / 47

Çayyolu Çankaya / ANKARA – TÜRKİYE

E-mail: dpo@ntss.com.tr

Phone: +90 (312) 911 0 860

PREPARED MANAGEMENT REPRESENTATIVE 	APPROVED GENERAL MANAGER 
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