

HUMAN INSIDE
POLICY OF PROTECTION
AND
PROCESSING
PERSONAL DATA

HUMAN INSIDE
PROTECTION AND PROCESSING
PERSONAL DATA
INFORMATION FORM

Document Name:

HUMAN INSIDE Policy of Protection and Processing of Personal Data

Target Group:

All natural people whose personal data is processed by HUMAN INSIDE and except employees of HUMAN INSIDE

Prepared By:

Legal Consultancy Department of HUMAN INSIDE

Version:

Attestator:

Confirmed by HUMAN INSIDE Board of Management

Date of Update:

In case there is a discrepancy between the original text and any other translated text, Turkish text has to be taken into account.

CONTENTS

1. CHAPTER 1–INTRODUCTION	6
1.1. INTRODUCTION.....	6
1.2. PURPOSE OF POLICY.....	7
1.3. CONTENT.....	7
1.4. IMPLEMENTATION OF THE POLICY AND APPLICABLE LAW.....	7
1.5. ENFORCEMENT OF THE POLICY.....	7
2. CHAPTER 2–PARTICULARS RELATED TO PROTECTION OF PERSONAL DATA	8
2.1. PROVIDING THE SECURITY OF PERSONAL DATA	8
2.1.1. Taken Technical and Administrative Precautions In Order To Legally Process The Personal Data	8
(i) Taken Technical Precautions In Order To Legally Process The Personal Data	8
(ii) Taken Administrative Precautions In Order To Legally Process The Personal Data.....	8
2.1.2. Taken Technical and Administrative Precautions In Order To Prevent Personal Data To Be Illegally Accessed.....	9
(i) Taken Technical Precautions In Order To Prevent Personal Data To Be Illegally Accessed	9
(ii) Taken Administrative Precautions In Order To Prevent Personal Data To Be Illegally Accessed.....	9
2.1.3. Protecting Personal Data in Safe Setting	11
(i) Taken Technical Precautions In Order To Protect Personal Data in Safe Setting..	11
(ii) Taken Administrative Precautions In Order To Protect Personal Data in Safe Setting	11
2.1.4. Supervision of The Taken Precautions Related to Protecting Personal Data	12
2.1.5. Precautions Which Will Be Taken In Case of Unauthorized Reveal of Personal Data 12	
2.2. LOOKING AFTER DATA OWNER’S RIGHTS; SHAPING MEANS TO COMMUNICATE THESE RIGHTS AND EVALUATING THE DEMANDS OF DATA OWNERS	12
2.3. PROTECTING SPECIAL QUALITY PERSONAL DATA	13
2.4. INCREASING AWARENESS OF WORK UNITS ABOUT PROTECTING AND PROCESSING	

PERSONAL DATA AND SUPERVISION OF IT	13
2.5. INCREASING AWARENESS OF BUSINESS PARTNERS AND SUPPLIERS ABOUT PROTECTING AND PROCESSING PERSONAL DATA AND SUPERVISION OF IT.....	13
3. CHAPTER 3–PARTICULARS RELATED TO PROCESSING PERSONAL DATA	14
3.1. PROCESSING PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES DESIGNATED IN THE LEGISLATION	15

3.1.1. Processing Proper To Law and Good Faith	15
3.1.2. Keeping Personal Data True and Updated When Needed	15
3.1.3. Processing for Determined, Clear and Legitimate Purposes	15
3.1.4. Being Correlated, Limited, Restrained with Processing Purposes.....	15
3.1.5. Preserving Till Requisite Period of Applicable Law and Processing Purposes ...	14
3.2. PROCESSING PERSONAL DATA BASED ON ONE OR SEVERAL CONDITIONS OF PERSONAL DATA PROCESSING SPECIFIED IN ARTICLE 5 OF PERSONAL DATA PROTECTION LAW AND RESTRAINED TO THESE CONDITIONS.....	16
3.3. PROCESSING THE DATA, WHICH IS BEING PROCESSED BY COMMUNITY COMPANIES, BY HUMAN INSIDE.....	16
3.4. ENLIGHTENING AND INFORMING THE PERSONAL DATA OWNER.....	16
3.5. PROCESSING SPECIAL QUALITY PERSONAL DATA.....	17
3.6. CONVEYING PERSONAL DATA.....	17
3.6.1. Conveying Personal Data.....	17
3.6.2. Conveying Special Quality Personal Data	18
3.7. CONVEYING PERSONAL DATA OVERSEAS	18
3.7.1. Conveying Personal Data Overseas	19
3.7.2. Conveying Special Quality Personal Data Overseas	19
4. CHAPTER 4 - CATEGORISATION, PROCESSING PURPOSES AND PRESERVING PERIODS OF PERSONAL DATA WHICH IS PROCESSED BY OUR COMPANY	20
4.1. CATEGORISATION OF PERSONAL DATA.....	20
4.2. PROCESSING PURPOSES OF PERSONAL DATA.....	22
4.3. PRESERVING PERIODS OF PERSONAL DATA.....	23
5. CHAPTER 5 – CATEGORISATION RELATED TO OWNERS OF PERSONAL DATA, PROCESSED BY HUMAN INSIDE.....	24
6. CHAPTER 6– THIRD PARTIES WHO ARE IMPARTED TO PERSONAL DATA BY HUMAN INSIDE AND CONVEYING PURPOSES.....	26
7. CHAPTER 7 - PROCESSING PERSONAL DATA BASED AND RESTRAINED ON THE CONDITIONS IN PERSONAL DATA PROTECTION LAW	28
7.1. PROCESSING PERSONAL DATA AND SPECIAL QUALITY PERSONAL DATA	28
7.1.1. Processing Personal Data	28
(i) Express Consent of Owner of Personal Data.....	28

(ii)	Clear Specification in Legislation	28
(iii)	Being unable to receive the express consent of the related person because of physical challenges.....	29
(iv)	Drawing up the contract and being directly related to its accomplishment.....	29
(v)	Human Inside's Fulfilling Its Obligations	29
(vi)	Publicizing Personal Data by Its Owner	29
(vii)	Necessity of Data Processing In Order to Establish or Protect a Right	29
(viii)	Necessity of Data Processing For The Sake of Human Inside's Legitimate Interest.....	29
7.1.2.	Processing Special Quality Personal Data.....	30
8.	CHAPTER 8 – PERSONAL DATA PROCESSING ACTIONS IN BUILDING, FACILITY ENTRANCES, BUILDING FACILITIES, WEBSITE VISITORS.....	30
8.1.	CAMERA SURVEILLANCE SYSTEM USAGE IN HUMAN INSIDE BUILDING, FACILITY ENTRANCES AND INSIDE FACILITIES.....	30
8.1.1.	Legal Foundation of Camera Surveillance System	31
8.1.2.	Camera Surveillance System Usage According to The Law of KVK	31
8.1.3.	Announcing The Usage of Camera Surveillance System	31
8.1.4.	The Purpose of Camera Surveillance System and Being Restrained by The Purpose	31
8.1.5.	The Security of Obtained Data	31
8.1.6.	Preserving Period of Data Obtained by Camera Surveillance System	31
8.1.7.	Who Can Access The Data Obtained By Camera Surveillance System and Whom The Data is Conveyed	32
8.2.	MONITORING IN AND OUT OF THE BUILDING AND FACILITIES OF HUMAN INSIDE	32
8.3.	PRESERVING THE RECORDS OF INTERNET ACCESS PROVIDED TO VISITORS IN BUILDING AND FACILITIES OF HUMAN INSIDE	32
8.4.	WEBSITE VISITORS.....	32
9.	CHAPTER –9 CONDITIONS OF DELETING, EXTERMINATING AND ANONYMIZING OF PERSONAL DATA	33
9.1.	HUMAN INSIDE'S OBLIGATION OF DELETING, EXTERMINATING AND ANONYMIZING.....	33
9.2.	TECHNIQUES OF DELETING, EXTERMINATING AND ANONYMIZING PERSONAL DATA	33
9.2.1.	Techniques of Deleting and Exterminating Personal Data.....	33

9.2.2. Techniques of Anonymizing Personal Data	34
(i) Masking	34
(ii) Aggregation	34
(iii) Data Derivation	34
(iv) Data Shuffling (Data Permutation)	35
10. CHAPTER 10– THE RIGHTS OF PERSONAL DATA OWNERS; THE METHODOLOGY OF USING AND EVALUATING OF THESE RIGHTS.....	35
10.1 RIGHTS OF THE DATA OWNER AND USING THESE RIGHTS.....	35
10.1.1. Rights of Personal Data Owner	35
10.1.2. Circumstances That Data Owner Can Not Demand	36
10.1.3. Usage of The Rights By Data Owner	36
10.1.4. Complaint Right of Personal Data Owner to The Council of KVK	37
10.2. RESPONDING OF HUMAN INSIDE TO APPLICATIONS.....	37
10.2.1. Human Inside’s responding method and period to applications	37
10.2.2. Information Which Are Requested from Personal Data Owner in Applications by Human Inside.....	37
10.2.3. Human Inside’s Right of Rejecting The Application of Personal Data Owner	37
11. CHAPTER 11 - RELATIONSHIP BETWEEN HUMAN INSIDE’S POLICY OF PROTECTING AND PROCESSING THE PERSONAL DATA AND OTHER POLICIES.....	38
12. CHAPTER 12 - GOVERNANCE STRUCTRE OF HUMAN INSIDE’S PROTECTING AND PROCESSING PERSONAL DATA POLICY	38
APPENDIX - 1 DEFINITIONS	40
APPENDIX - 2 ABBREVIATIONS.....	42
APPENDIX - 3 SIGNIFICANT DATES IN TERMS OF THE ENFORCEMENT OF THE PROTECTION OF PERSONAL DATA LAW	43
APPENDIX - 4 DATA PROCESSING OF EMPLOYEE CANDIDATES’ PERSONAL DATA.....	43

1. CHAPTER 1–INTRODUCTION

1.1. INTRODUCTION

Protecting personal data is more of an issue for Human Inside Incorporated Company and among our priorities. Protecting the personal data of our employee candidates who are managed by hereby policy, actionaries, company officials, visitors, employees of companies that we are in cooperation, actionaries, authorities and third parties is the most important basis of this issue. Activities about protecting personal data of our employees performed by Human Inside are managed in the context of protecting and processing personal data of Human Inside employee's policy, which is correspondingly written to hereby policy.

According to the Constitution of The Republic of turkey, everyone has the right of demanding protection of their personal data. Human Inside is attentive to protecting personal data, which is a constitutional right, of employee candidates; actionaries; company officials; visitors; employees, actionaries, officials and third parties of cooperating institutions and determines this as policy.

In this context, in order to protect processed personal data as required by the legislation, necessary administrative and technical precautions are taken by Human Inside.

In this policy, Human Inside apprises fundamental tenets that it indigenizes and specified below:

- Processing personal data proper to law and good faith,
- Keeping personal data true and updated when it is needed,
- Processing personal data for determined, clear and legitimate purposes,
- Being correlated, limited, restrained with processing purposes,
- Preserving personal data till requisite period of applicable law and processing purposes,
- Enlightining and informing personal data owners,
- Building the required system in order to help personal data owners to exercise their rights,
- Taking necessary precautions about protecting personal data,
- Acting proper to applicable law and regulations of The Council of Personal Data Protection about the necessities of processing personal data,
- Displaying the necessary sensitivity upon processing and protecting of special quality personal data.

1.2. PURPOSE OF POLICY

The basis purpose of this policy is providing transparency by explaining the systems which are legally used in protection of personal data and personal data processing actions and also informing people mainly our employee candidates; actionaries; company officials; visitors; employees, actionaries,officials and third parties of cooperating instutions whose personal data is processed by Human Inside.

1.3. CONTEXT

This policy is pertained to all personal data, which are processed with automatic or any other nonautomated methods, of our employee candidates; actionaries; company officials; visitors; employees, actionaries, officials and third parties of cooperating institutions.

Scope of application of hereby policy can be solely a part of provisions (only our visitors etc.) as well as fullest extent (our employee candidates who are our visitors at the same time etc.).

1.4. IMPLEMENTATION OF POLICY AND APPLICABLE LAW

Related legal regulations which are in legislation about processing and protecting of personal data are top priority. Human Inside takes into consideration the legislation in force in case of a discrepancy between the legislation in force and policy.

The policy has been formed by concretizing and regulating the orders which are designated by applicable law. Human Inside carries on its activities in accordance with validity periods which designated in KVK (Personal Data Protection) Law. (See Appx.3)

1.5. ENFORCEMENT OF POLICY

Policy, which came into force in 7 October 2016 and issued by Human Inside, was updated in 30 December 2016.

Policy is published on website of Human Inside (www.humaninside.net) and shared with related people upon demand of personal data owners.

2. CHAPTER 2 – PARTICULARS RELATED TO PROTECTION OF PERSONAL DATA

Human Inside takes necessary technical and administrative precautions related to prevention of illegally processing of personal data, which it processes in accordance with the Article 12 of KVK Law, prevention of illegally access. In this context, Human Inside conducts the necessary inspections or make it done.

2.1. PROVIDING THE SECURITY OF PERSONAL DATA

2.1.1. Taken Technical and Administrative Precautions In Order To Legally Process The Personal Data

Human Inside takes technical and administrative precautions by technological opportunities and application costs in order to make personal data is legally processed.

(i) Taken Technical Precautions In Order To Legally Process The Personal Data

Main technical precautions, which are taken by Human Inside in order to make personal data is legally processed, are listed below:

- Personal data processing actions within Human Inside are inspected by built technical systems.
- Taken technical precautions are periodically reported to related person by the force of internal check mechanism.
- Specialist employees are hired.

(ii) Taken Administrative Precautions In Order To Legally Process The Personal Data

Main administrative precautions, which are taken by Human Inside in order to make personal data is legally processed, are listed below

- Employees are informed and educated about protection of personal data law and legally processing personal data.
- All the actions carried out by Human Inside are analyzed specific to all work units and as a result of this analysis, personal data processing actions are designed specific to related work units' actions.
- Personal data processing actions are designated specific to necessities which are specified in KVK Law.
- Awareness is raised specific to related work units and rules of procedure are designated in order to meet the required concord laws; necessary administrative precautions are put into practice through company policies and trainings.

- Records, which forbid data processing, reveal or usage except Human Inside's instructions and law exceptions, are added and employee awareness is raised about this issue and inspections are conducted.

2.1.2. Taken Technical and Administrative Precautions In Order To Prevent Personal Data To Be Illegally Accessed

Human Inside takes technical and administrative precautions by technological opportunities and application costs in order to prevent personal data to be improvidently and incompetently stated, accessed, conveyed or in any other illegal access methods.

(i) Taken Technical Precautions In Order To Prevent Personal Data To Be Illegally Accessed

Main technical precautions, which are taken by Human Inside in order to prevent personal data to be illegally accessed, are listed below:

- Technical precautions, which are fit to technological improvements, are taken, taken precautions are periodically updated and renovated.
- Access and authorization solutions, which are in accordance with designated orders and requirements, are used
- Access authorizations are limited, periodically reviewed.
- All taken technical precautions are reported to related people by force of periodical internal check mechanism, technological solutions are created by evaluating particulars that entail risk.
- Softwares and hardware which involve virus protection systems are set up.
- Specialist employees are hired.
- Applications, which involves the personal data, are regularly screened for determining the security flaws.

(ii) Taken Administrative Precautions In Order To Prevent Personal Data To Be Illegally Accessed

Main administrative precautions, which are taken by Human Inside in order to prevent personal data to be illegally accessed, are listed below:

- Employees are educated about technical precautions which will be taken in order to prevent illegal access to personal data.
- Accessing to personal data and authorization processes are designed and practiced in accordance with legal necessities in company.
Employees are informed about they can not expound the personal data they learned in defiance of KVK law, misuse and also informed about this obligation goes on after they resigned. In this respect, necessary commitments are made by them.
- Contracts, which are executed between Human Inside and people who are

personal data is legally conveyed, have terms that concerning both sides will take the necessary precautions.

2.1.3. Protecting Personal Data in Safe Setting

Human Inside takes necessary technical and administrative precautions by technological opportunities and application costs in order to preserve personal data in safe settings and prevent personal data to be illegally exterminated, lost or changed.

(i) Taken Technical Precautions In Order To Protect Personal Data in Safe Setting

Main technical precautions, which are taken by Human Inside in order to preserve personal data in safe settings, are listed below:

- Systems that proper to technological improvements are used in order to preserve personal data in safe settings.
- Specialist employees are hired.
- Technical security systems are set up aimed at fixed storages, taken technical precautions are periodically reported to related people by force of internal check mechanism, necessary technological solutions are created by evaluating particulars that entail risk.
- Backup programs are legally used in order to safely preserve personal data.
- Unauthorized access tries to data storages are recorded and transiently conveyed to related people

(ii) Taken Administrative Precautions In Order To Protect Personal Data in Safe Setting

Main administrative precautions, which are taken by Human Inside in order to preserve personal data in safe settings, are listed below

- Employees are educated about providing the safe preserving of personal data.
- In case an external service is taken by reason of technical necessities in order to preserve personal data by Human Inside, contracts, which are made between Human Inside and companies which legally convey personal data, have terms that assures necessary security precautions will be taken in order to safely preserve the personal data.

2.1.4. Supervision of The Taken Precautions Related To Protecting Personal Data

Human Inside conducts necessary inspections and make them done in accordance with Article 12 of KVK Law. These inspection results are reported to related units in the context of internal processing of Human Inside and necessary actions which are required to enhance the taken precautions are done.

2.1.5. Precautions Which Will Be Taken In Case of Unauthorized Reveal of Personal Data

In case of processed personal data, which is processed in accordance with Article 12 of KVK Law, is illegally obtained by others, Human Inside runs a system that informs related people about the situation as soon as possible. If it is deemed suitable by The Council of KVK, this

situation can be declared on the website of The Council of KVK or in any other method.

2.2. LOOKING AFTER DATA OWNER'S RIGHTS; SHAPING MEANS TO COMMUNICATE THESE RIGHTS AND EVALUATING THE DEMANDS OF DATA OWNERS

Human Inside adjusts necessary means, internal processing, administrative and technical regulations in accordance with the Article 13 of KVK Law in order to evaluate rights of personal data owners and inform them.

In case personal data owners orthographically make their applications related to rights specified below, Human Inside concludes the request by the qualification of it at the latest 30 days free of charge. However, in the act of defining a cost by The Council of KVK, the defined cost by The Council of KVK will be received by Human Inside. Personal data owners have the rights of;

- Learning whether their personal data is processed or not,
- If their personal data is processed, requesting information related to it,
- Learning purpose of processing their personal data and whether it is used relevantly or not,
- Knowing the third parties, who are imparted with their personal data in domestic or abroad,
- Requesting the correction of their personal data in case they are deficiently or wrongly processed and third parties to be informed about the correction,
- Requesting deleting or extermination of their personal data in case the disappearance of the reasons which require processing the personal data in terms of purpose, time and legitimacy principles.
- Opposing it in case of the emergence of a consequence against them by analyzing their processed personal data with exclusively automatic systems,
- Requesting the absorption of loss if their personal data is processed illegally and they sustain loss because of this reason.

More detailed information about the rights of data owners is given in the 10th chapter of this policy.

2.3. PROTECTING SPECIAL QUALITY PERSONAL DATA

Certain personal data is attached special importance because of the risk of unjust treatment or discrimination with KVK Law. These are; race, ethnic origin, political opinion, philosophical belief, religion, sectarian or any other beliefs, appearance, association, foundation or union membership, health, sexual life, being sentenced, biometric and genetics.

Preserving special quality personal data, which is designated as “special quality” by KVK and legally processed, is attached special importance by Human Inside. In this context, taken technical and administrative precautions in order to preserve personal data are carefully exercised in term of special quality data and necessary inspections are made by Human Inside. More detailed information about processing personal data is given in the 3rd chapter of this policy.

2.4. INCREASING AWARENESS OF WORK UNITS ABOUT PROTECTING AND PROCESSING PERSONAL DATA AND SUPERVISION OF IT

Human Inside provides necessary educations to work units in order to prevent personal data to be illegally processed, illegally accessed and to increase awareness about protection of data.

Necessary systems are set up in order to create the awareness of work units, current employees and new employees of Human Inside. If required, specialist employees are hired.

Education results, which are provided to increase awareness about the protecting and processing of personal data, are reported to related people. In this respect, Human Inside evaluates the participation to educations, seminars and information sessions and makes the necessary inspections and made them done. Human Inside, correspondingly updates and renews its educations to updates of applicable law.

2.5. INCREASING AWARENESS OF BUSINESS PARTNERS AND SUPPLIERS ABOUT PROTECTING AND PROCESSING PERSONAL DATA AND SUPERVISION OF IT

Human Inside provides educations and seminars to its business partners and suppliers in order to prevent personal data to be illegally processed, illegally accessed and to increase awareness about protecting of data.

Educations, which are aimed at business partners and suppliers, are periodically repeated, necessary systems are set up in order to raise the awareness of current employees of business partners and suppliers and their new employees about protecting personal data, if required specialist employees are hired.

Education results, which are provided to increase awareness about the protecting and processing of personal data, are reported to related people. In this respect, Human Inside evaluates the participation to educations, seminars and information sessions and makes the necessary inspections and made them done. Human Inside, correspondingly updates and renews its educations to updates of applicable law.

3. CHAPTER 3 - PARTICULARS RELATED TO PROCESSING PERSONAL DATA

Human Inside is engaged in personal data processing in accordance with Article 20 of the Constitution and Article 4 of KVK Law, by befittingly to law and good faith, pursuing updated, specified, clear and legitimate goals. Human Inside preserves personal data till requisite period of applicable law or processing purposes.

Human Inside, processes personal data based on one or several conditions of personal data processing specified in Article 5 of Personal Data Protection Law in accordance with Article 20 of The Constitution and Article 5 of Personal Data Protection Law.

Human Inside enlightens personal data owners in accordance with Article 20 of The Constitution and Article 10 of Personal Data Protection Law, in case personal data owners request information, Human Inside gives the necessary information.

Human inside acts according to the terms designated in Article 6 of Personal Data Protection Law in terms of processing special quality personal data.

Human Inside acts according to the terms which designated about conveying personal data and designated by The Council of KVK in accordance with Article 8 and 9 of KVK Law.

3.1. PROCESSING PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES DESIGNATED IN THE LEGISLATION

3.1.1. Processing Proper To Law and Good Faith

Human Inside acts according to principles which are designated in applicable law and good faith. In this context, Human Inside considers the necessities of proportionateness in personal data processing, does not misuse them.

3.1.2. Keeping Personal Data True and Updated When Needed

Human Inside keeps personal data true and updated by considering the fundamental rights of personal data owners and its own legitimate interests. In this respect Human Inside takes necessary precautions. For example, a system which helps personal data owners to confirm the correction and correct their personal data, is set up by Human Inside. More detailed information about this issue is given in the 10th chapter of this policy.

3.1.3. Processing for Determined, Clear and Legitimate Purposes

Human inside clearly and sharply defines its legitimate and legal purpose of data processing. Human Inside processes as correlated with the carried commercial action and as much as it is needed.

3.1.4. Being Correlated, Limited, Restrained with Processing Purposes

Human Inside serviceably processes the personal data to fulfill the defined purpose and avoids processing unrelated or super flux personal data. For instance, Human Inside does not process considering the following needs.

3.1.5. Preserving Till Requisite Period of Applicable Law and Processing Purposes

Human Inside preserves personal data till requisite period of applicable law and processing purposes. In this context, Human Inside determines whether there should be period to preserve personal data or not, If there should be acts out according to this period and preserves the data as long as the requisite period. Personal data are deleted in case the period is over or processing reasons disappeared. Personal data is not preserved with the probability of using later. More information about this issue is given in the 9th chapter of this policy.

3.2. PROCESSING PERSONAL DATA BASED ON ONE OR SEVERAL CONDITIONS OF PERSONAL DATA PROCESSING SPECIFIED IN ARTICLE 5 OF PERSONAL DATA PROTECTION LAW AND RESTRAINED TO THESE CONDITIONS

Protecting personal data is a constitutional right. Basic rights and liberties can only be limited in accordance with the terms which are defined in Articles of The Constitution. As per paragraph 3, Article 20 of the Constitution, personal data can only be processed with the express consent of person or by constitutional orders. More information about this issue is given in the 7th chapter of this policy.

3.3. PROCESSING THE DATA, WHICH IS BEING PROCESSED BY COMMUNITY COMPANIES, BY HUMAN INSIDE

With the purpose of carrying out the actions of community companies in accordance with the principle, aim and strategies of Human Inside and to protect rights and interests of Human Inside, community companies can also process the personal data. In case the personal data sharing switches between community companies and Human Inside in the context of KVK Law, related community company enlightens the person about the conveying of the personal data.

3.4. ENLIGHTENING AND INFORMING THE PERSONAL DATA OWNER

Human Inside enlightens personal data owners during the obtainment of personal data in accordance with Article 10 of KVK Law. In this context, Human Inside informs personal data owner about if any the identity of its delegate, for what purposes the personal data will be processed, to whom it may be conveyed and for what purposes, the method of personal data gathering and the legal basis of it, the rights that personal data owner have. More information about this issue is given in the 10th chapter of this policy.

The right of being informed about personal data is given in Article 20 of The Constitution. In this respect, "Requesting Information" is defined among the rights of personal data owner in Article 11 of KVK Law. In this respect, Human Insides informs the personal data owner in accordance with Article 20 of The Constitution and Article 11 of KVK Law. More information about this issue is given in the 10th chapter of this policy.

3.5. PROCESSING SPECIAL QUALITY PERSONAL DATA

In processing personal data, which are specified by “special quality” by KVK Law, behaved accordingly to the terms that designated in KVK Law by Human Inside.

In Article 6 of KVK Law, Certain personal data is attached special importance because of the risk of unjust treatment or discrimination with KVK Law. These are; race, ethnic origin, political opinion, philosophical belief, religion, sectarian or any other beliefs, appearance, association, foundation or union membership, health, sexual life, being sentenced, biometric and genetics.

Special quality personal data are processed by Human Inside in accordance with KVK Law and only if necessary, precautions are taken that designated by The Council of KVK are taken in the cases of:

- If there is express consent of personal data owner,
- If there is not express consent of personal data owner;
 - In the cases of legal special quality data except the health and sexual life of personal data owner,
 - If they are special quality data about the health and sexual life of personal data owner, they are processed only for the purpose of protecting public health, preventive medicine, medical diagnosis, nursing and treatment services, planning and managing sanitation by authorized institution or institutions and people who are under the obligation of secrecy.

3.6. CONVEYING PERSONAL DATA

Human Inside can convey personal data and special quality personal data of personal data owners to third parties (See Chapter 6) by taking the necessary security precautions (See Chapter 2/Title 2.1). in accordance with applicable law. Human Inside acts in accordance with the terms which are designated in Article 8 of KVK Law. More detailed information about this issue is given in the 6th chapter of this policy.

3.6.1. Conveying Personal Data

Human Inside can convey personal data to third parties in the respect of legitimate and legal purposes of it and being based on one or several conditions of data processing that defined in Article 5 of KVK Law:

- If there is express consent of personal data owner,
- If there is a clear term about conveying personal data in law,

- If it is necessary to protect the life and health of personal data owner or other people, If personal data owners can not give their express consent openly because of physical challenges or their express consent are not accepted by law;
- If it is necessary to convey personal data to contractors only if it is related to the contraction,
- If it is necessary for Human Inside to fulfill its obligation to convey personal data is required
- If personal data are publicized by personal data owner,
- If conveying personal data is required in order to claim, using or protecting a right,
- If it is necessary for the legitimate purposes of Human Inside to convey personal data only if without damaging the fundamental rights and freedoms of personal data owner.

3.6.2. Conveying Special Quality Personal Data

Human Inside can convey special quality data of personal data owners to third parties by paying strict attention and taking necessary security precautions (See Chapter2/Title 2.1) and taking precautions which are designated by KVK Law; in the respect of legitimate and legal personal data processing purposes in these cases;

- If there is express consent of personal data owner
- If there is not express consent of personal data owner;
 - Special quality personal data of personal data owners except their health and sexual life (*race, ethnic origin, political opinion, philosophical belief, religion, sectarian or any other beliefs, appearance, association, foundation or union membership, health, sexual life, being sentenced, biometric and genetics*), in the situations that applicable to law,
 - Special quality personal data of personal data owners related to their health and sexual life only if about the health and sexual life of personal data owner, for the purpose of protecting public health, preventive medicine, medical diagnosis, nursing and treatment services, planning and managing sanitation by authorized institution or institutions and people who are under the obligation of secrecy.

3.7. CONVEYING PERSONAL DATA OVERSEAS

Human Inside can convey personal data and special quality personal data of personal data owner to third parties by taking necessary security precautions in the respect of its legal personal data processing purposes.

Human Inside can convey personal data to foreign countries, which are declared that they have adequate protection ("Foreign Country which has adequate protection) by The Council of KVK,

or in case adequate protection can not be found foreign countries, which assure adequate protection (“Foreign Country in which Data Responsible guarantees to adequate protection”), have KVK allowance. In this respect, Human Inside acts in accordance with the terms in Article 9 of KVK Law. More detailed information about this issue is given in the 6th chapter of this policy.

3.7.1. Conveying Personal Data Overseas

Human Inside can convey personal data to Foreign Countries, Which Have Adequate Protection or in Which Data Responsible Guarantees to Adequate Protection, in the respect of legal and illegitimate personal data processing purposes in case of there is express consent of personal data owner or if there is not express consent of data owner, existence of one of the situations listed below:

- If there is a term about conveying personal data in law,
- If it is necessary to protect life or health of personal data owner or other people and if personal data owners can not give their express consent because of physical challenges or their consent is not accepted by law,
- If it is necessary to convey personal data to contractors only if it is related to the contraction
- If it is necessary for Human Inside to convey personal data in order to fulfill its legal obligation,
- If personal data are publicized by personal data owner,
- If conveying personal data is required in order to claiming, using or protecting a right,
- If data conveying is necessary for Human Inside's legitimate interests only if not violating fundamental rights and freedoms of personal data owner.

3.7.2. Conveying Special Quality Personal Data Overseas

Human Inside can convey special quality personal data of personal data owner to Foreign Countries, which have adequate protection or in which Data Responsible guarantees to adequate protection by being attentive, taking necessary precautions, and taking necessary precautions which are designated by The Council of KVK in the respect of legitimate and legal personal data processing purposes in cases specified below;

- If there is express consent of personal data owner or,
- If there is not express consent of personal data owner;
 - Special quality personal data of personal data owners except their health and sexual life (*race, ethnic origin, political opinion, philosophical belief, religion, sectarian or any other beliefs, appearance, association, foundation or union membership, health, sexual life, being sentenced, biometric and genetics*), in applicable situations to law,
 - Special quality personal data of personal data owners related to their health and sexual life only if about the health and sexual life of personal data owner, for the purpose of protecting public health, preventive medicine, medical diagnosis, nursing and treatment services, planning and managing sanitation by authorized institution or institutions and people who are under the obligation of secrecy.

4. CHAPTER 4 - CATEGORISATION, PROCESSING PURPOSES AND PRESERVING PERIODS OF PERSONAL DATA WHICH IS PROCESSED BY OUR COMPANY

Human Inside informs personal data owner about which personal data groups process which personal data, purpose of their personal data processing and storage periods of their personal data.

4.1. CATEGORIZATION OF PERSONAL DATA

Personal data which are specified below in categories are processed thereby in the respect of Human Inside's legitimate and legal data processing purposes, being based or limited on one or several personal data processing conditions which are defined in Article 5 of KVK Law, in accordance with general principles and all terms which are specified in KVK Law, particularly principles that specified in Article 4, subjects (client of community companies, visitor, third party, employee candidate, actionary, company official, employees, actionaries and officials of cooperated companies), in the respect of hereby policy, by informing related people in accordance with Article 10 of KVK Law.

Identity Information Categorization	Categorization Explanation
Identity Information	Data, which are clearly belonged to a natural person who is identified or can be identified and are partially or completely automatically processed such as; name-surname, T.R. identity number, nationality information, parents' names, birth place, date of birth, number of SGK (social security institutiton), signature information, license plate.
Communication Information	Data, which are clearly belong to a natural person who is identified or can be identified and partially or completely automatically processed, such as telephone number, address, e-mail address, fax number, ip adress.

Location Data	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed and which determine the location information of employees who work in correlated cooperated companies while using products, services and vehicles of Human Inside and community companies, such as; GPS location, travel information etc.
Family Members and Kinsmen Information	Data, which are clearly belong to a natural person who is identified or can be identified and partially or completely automatically processed, about family members of personal data owner, kinsmen, and people who can be contacted in case of an emergency by the purpose of protection of the legal and illegitimate interests of personal data owner by Human Inside
Physical Location Security Information	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed, and records, which are taken during entrance of the physical location and meantime, such as; camera records, fingerprints and records that taken in security point.
Financial Information	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed and which are created by the legal relationship type with the personal data owner such as; account number, IBAN number, credit card information, financial profile, asset data, income certificate etc.
Visual/Aural Information	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed, such as; photograph or camera records (except Physical Location Security Information data), and copy of documents which involve voice records and personal data
Personnel Information	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed and help the emergence of copyrights of natural people who are in labour economics with Human Inside.

Special Quality Personal Data	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed and specified in Article 6 of KVK Law such as; health information including blood type, biometric information, religion and associations.
Demand/Complaint Management Information	Data, which are clearly belonged to a natural person who is identified or can be identified and partially or completely automatically processed and related to evaluation and receiving of demands and complaints that directed to Human Inside.

4.2. PROCESSING PURPOSES OF PERSONAL DATA

Human Inside confinedly processes personal data as per Article 5 paragraph 2 and Article 6 paragraph 3 of KVK Law. Defined purposes and terms that;

- Allow data processing actions by Human Inside
- Setting up a contract, that directly related to issue, which allows Human Inside to process your personal data
- Necessity of processing your personal data for Human Inside in order to fulfill its obligation.
- With the condition of they are publicized by you, processing your personal data by being limited to your publicizing purpose.
- Necessity of processing your personal data in order to establish, exercise or protection rights of Human Inside or you or third parties
- With the condition of not harming your fundamental rights and freedoms, necessity of processing your personal data in order to legitimate purposes of Human Inside
- Necessity of processing your personal data in order to protect life and body integrity of personal data owner or any other person and in this respect, the inability of personal data owners expressing their consent.
- Are defined with regard to special quality data except health and sexual life of personal data owner
- If they are related to special quality personal data of personal data owner about health and sexual life, are processed in order to protect public health, provide preventive medicine, medical diagnosis, treatment and caring services, planning and managing the services and financing of health by people who are in confidentiality obligation or authorized institution and institutions.

In this context, Human Inside processes your personal data for purposes listed below:

- Planning and implementation of institutional sustainability activities
- Activity management
- Managing relationship with business partners or suppliers
- Managing personnel recruitment processes (See Appx-4 related to processing personal data of employee candidates)
- Supporting personnel recruitment processes of community companies
- Implementation and following up financial reporting and risk management activities of Human Inside
- Implementation and following up legal affairs of Human Inside
- Planning and implementation of corporate communication activities
- Implementation of corporate governance activities
- Implementation of legal affairs of companies and association
- Demand and complaint management
- Providing security of community values
- Supporting community companies about orientation of applicable law
- Planning side benefits and interests, which will be provided to Human Inside and senior managers of community companies and supporting implementation processes
- Planning and implementation of supervision activities in order to carry activities of community companies in accordance with Human Inside procedures and applicable law
- Supporting community companies about implementation of their corporations' law and legislation obligations
- Performing studies about the protection of Human Inside's reputation
- Managing investor relationships
- Informing competent body from applicable law
- Recording and following up visitor logs.

Your express consent is required in case the specified processing actions do not fulfil the conditions in KVK Law.

4.3. PRESERVING PERIODS OF PERSONAL DATA

Human Inside preserves personal data in case it is prescribed in related legislation and applicable law till the specified period designated in applicable law.

In case there is not any term about preserving time of personal data, personal data is processed as long as activities and practices of Human Inside’s commercial life and later it is deleted, exterminated or anonymized. More information about this issue is given in the 9th chapter of this policy.

If processing personal data purposes are attained; the period that designated by applicable law and Human Inside has finished; personal data can only be preserved for the purpose of producing as an evidence in case of possible legal disputes or constituting plea. Preserving periods are designated by periods of limitation related to making claim on aforementioned right and expired requests about similar issues. In this case, personal data, which are preserved, can not be accessed for any reason but if there is a need for them in case of legal dispute, they can be accessed. Personal data is deleted, exterminated or anonymized after the mentioned periods are over.

5. CHAPTER 5 – CATEGORIZATION RELATED TO OWNERS OF PERSONAL DATA, PROCESSED BY HUMAN INSIDE

Context of hereby policy is limited with clients of community companies, visitors, third parties, employee candidates, actionaries, company officials; employees, actionaries and officials of our cooperated companies.

Personal data protecting and processing activities of our employees are evaluated under the roof of Human Inside’s Employees’ protecting and processing personal data policy.

By categories of people, whose personal data is processed by Human Inside, are in above context, people who are not in this category can also demand from Human Inside in the respect of KVK Law; these people’s demands will be evaluated in the context of this policy.

Above, client of community companies; visitor; third party; employee candidate; actionary; company officials; employees, actionaries and officials of cooperated companies’ terms, which are in hereby policy, are clarified;

Category of Personal Data Owner	Explanation
Community Company Client	Regardless of whether there is contractual relationship or not, In the context of operations ran by Human Inside’s work units, natural people whose personal data is obtained by the work relationships with community companies
Visitor	Natural people who entered Human Inside’s physical location or who visited our website for various purposes.

Third Party	Other natural people who are not in the concept of this policy and Protection and Processing of Human Inside's Employees' Policy. (Such as guarantor, companion, family members and kinsmen, former employees.
Employee Candidate	Natural people, who applied for a job in any method to Human Inside and publicized their related information for the inspection of our company.
Actionary	Natural people who are actionaries of Human Inside
Company Officials	Natural people who are members of Human Inside's administrative board and other officials.
Employees, actionaries and Officials of Cooperated Companies	Natural people who work in institutions (business partner, supplier etc. But not limited to them) in which Human Inside is in every kind of relationship including actionaries and officials of these institutions.

Categories of personal data owners specified above and what kind of personal data of them is processed are detailed in table below.

PERSONAL DATA CATEGORISATION	PERSONAL DATA OWNER CATEGORY WHICH RELATED TO PERSONAL DATA
Identity Information	Community Companies Client; Employee Candidate; actionary; Company Official; Visitor; Employees, actionaries and Officials of Cooperated Companies, Third Party
Communication Information	Community Companies Client; Employee Candidate; actionary; Company Official; Visitor; Employees, actionaries and Officials of Cooperated Companies, Third Party
Location Data	Employees, Company Officials of Cooperated Institutions
Family Members and Kinsmen Information	Community Company Client; Visitor; Employee Candidate; Third Party; Employees, actionaries and Company Officials of Cooperated Companies
Physical Location Security Information	Visitor; Employee Candidate; actionaries; Company Officials; Employees, actionaries and Officials of Cooperated Companies, Third Party

Financial Information	Community Company Client; Employee Candidate; Actionist; Employee, Actionist and Officials of Cooperated Companies
-----------------------	--

Visual/Aural Information	Company Client; Employee Candidate; Shareholder; Company Official; Visitor; Employees, Shareholders, Officials of Cooperated Companies, Third Party
Personnel Information	Employees, Shareholders, Officials, Employee Candidates of Cooperated Companies, Third Party
Special Quality Personal Data	Company Client; Employee Candidate; Shareholder; Company Official; Visitor; Employees, Shareholders, Officials of Cooperated Companies, Third Party
Demand/Complaint Management Information	Company Client; Employee Candidate; Shareholder; Company Official; Visitor; Employees, Shareholders, Officials of Cooperated Companies, Third Party

6. CHAPTER 6 – THIRD PARTIES WHO ARE IMPARTED TO PERSONAL DATA BY HUMAN INSIDE AND CONVEYING PURPOSES

Human Inside informs personal data owner about whom their personal data is conveyed in accordance with Article 10 of KVK Law.

Human Inside can transfer personal data of personal data owners who are managed by hereby Policy to categories listed below in accordance with Article 8 and 9 of KVK Law (See Chapter 3/Title 3.5).

- (i) Human Inside business partners,
- (ii) Human Inside suppliers,
- (iii) Human Inside community companies,
- (iv) Human Inside shareholders,
- (v) Human Inside company officials,
- (vi) Legally Authorized state institutions and organizations
- (vii) Legally Authorized Private People

Context and data conveying purposes of people who specified above are listed below.

People whom data may be conveyed	Definition	Data conveying purpose
Business Partner	Defines parties who are cooperated in order to conduct various projects, get services with itself or Community Companies	Limited with purpose of providing the objectives of business partnership.

Supplier	Parties who provide services to Human Inside by based on commands and instructions of Human Inside.	Limited with purpose of providing exogenous services which are provided from supplier and in order to perform commercial activities of Human Inside
Community Companies	Human Inside Community Companies	Limited with providing performing commercial activities which require participation of Human Inside's Community Companies
Shareholders	Natural people who are shareholders of Human Inside	Limited with purposes of activities which are in the context of Corporate Law of Human Inside, event management, corporate communication processes
Company Officials	Board Members of Human Inside and other authorized natural people	Limited with designing strategies about Human Inside's commercial activities, managing of the highest order and supervision purposes in accordance with related legislation provisions
Legally Authorised State Institutions and Organizations	By terms of applicable law, legally authorized state institutions and organizations which are authorised to get information and document from Human Inside	Limited with purpose which is demanded by related state institutions and organizations
Legally Authorised Private People	By terms of applicable law, legally authorised private people who are authorized to get information and document from Human Inside	Limited with purpose which is demanded by private person within his or her legal authorization

Human Inside acts in accordance with the terms that designated in 2nd and 3rd chapter of The Policy while conveying personal data.

7. CHAPTER 7 – PROCESSING PERSONAL DATA BASED AND RESTRAINED ON THE CONDITIONS IN PERSONAL DATA PROTECTION LAW

Human Inside enlightens personal data owner about processed data which are processed in accordance with Article 10 of KVK Law.

7.1. PROCESSING PERSONAL DATA AND SPECIAL QUALITY PERSONAL DATA

7.1.1. Processing Personal Data

Express consent of personal data owner is just one of the legal bases that makes processing personal data legal. Except express consent, in the case of existence of one of the terms which are designated below, personal data can be processed. Legal basis of data processing activity can be just one of the terms which designated below but also more than one of these terms. In case processed data are special quality personal data; terms which are specified in chapter 7.1.2. Provided.

Even if legal bases about Human Inside's data processing actions differ, general principles which are specified in Article 4 of KVK Law are taken into account.

(i) Express Consent of Owner of Personal Data

One of the conditions of data processing is express consent of personal data owner. Express consent of personal data owner has to be expressed by related about a determined issue, based on informing and free will.

For the use of personal data processing activities(secondary processing), which are except for the purpose of obtaining personal data(primary processing), there has to be at least one of the conditions which are specified in hereby topic's (ii), (iii), (iv) (v), (vi), (vii) and (viii); If there is not one of these terms, these data processing actions are have to be exercised based on express consent of personal data owner.

In order to personal data to be depended on express consent of data owner, express consent of data owner is received with related methods.

(ii) Clear Specification in Legislation

Personal data of data owner can be legally processed in case it is specified in law.

Example: Including the name of related person on bill in accordance with Article 230 of Tax Procedure Law.

(iii) Being unable to receive the express consent of the related person because of physical challenges

Personal data of data owner can be processed in case of necessity of data processing in order to protect life and body integrity of people who can not express their express consent because of physical challenges or other people.

Example: Giving information of shareholder who felt faint in general meeting of shareholders by company employee to doctors.

(iv) Drawing up the contract and being directly related to its accomplishment

Processing personal data is possible in case it is necessary to process personal data of contract parties only if it is directly related to drawing up a contract and execution of it.

Obtaining bank account information of consultant in order to execution of consultancy agreement drew up with Business Partner with the purpose of paying the consultant.

(v) Human Inside's Fulfilling Its Obligations

Personal data of data owner can be processed in case processing is necessary in order to fulfill Human Inside's obligations as data controller.

Example: Submission of information, which are demanded by court order, to court.

(vi) Publicizing Personal Data by Its Owner

Related personal data can be processed in case personal data owners have publicized their data

Example: Publishing contact information in websites which allows making job applications by Employee Candidate.

(vii) Necessity of Data Processing In Order to Establish or Protect a Right

Personal data of personal data owner can be processed in case it is necessary to establishing, exercising or protecting of a right.

Example: Storing data that has proof quality and using when its necessary.

(viii) Necessity of Data Processing For The Sake of Human Inside's Legitimate Interest

Data can be processed in case it is necessary for the legitimate interests of Human Inside only if without harming fundamental rights and freedoms of personal data owner.

Example: Recording with the purpose of security in building and facilities of Human Inside.

7.1.2. Processing Special Quality Personal Data

If there is not express consent of personal data owner special quality personal data are only processed only by taking necessary precautions which are designated by The Council of KVK, in the cases listed below:

- (i) Special quality data except health and sexual life of personal data owner, in cases specified in Law,
- (ii) If data are special quality personal data related to health and sexual life of personal data owner, only for the purposes of protecting public health, providing preventive medicine, medical diagnosis, nursing and treatment services, planning and management of health care and its financing by people who have confidentiality obligation and authorized institutions and organizations.

8. CHAPTER 8 – PERSONAL DATA PROCESSING ACTIONS IN BUILDING, FACILITY ENTRANCES, BUILDING FACILITIES, WEBSITE VISITORS

Personal data processing activities which are performed in building entrances and facilities by Human Inside, are performed in accordance with The Constitution, KVK Law and applicable law.

Personal data processing activities are operated related to following up visitor in and outs by camera surveillance system in order to provide security by Human Inside.

Personal data processing activities are operated by using security cameras and recording in and outs of visitors.

8.1. CAMERA SURVEILLANCE SYSTEM USAGE IN HUMAN INSIDE BUILDING, FACILITY ENTRANCES AND INSIDE FACILITIES

In this chapter, statements about camera surveillance system of Human Inside will be made and information about how the confidentiality and fundamental rights of people are protected will be given.

In the context of camera surveillance system activities, Human Inside aspires after the security of Company and other People.

8.1.1. Legal Foundation of Camera Surveillance System

Camera Surveillance System activity is operated in accordance with Law on Private Security Services and applicable law by Human Inside.

8.1.2. Camera Surveillance System Usage According to The Law of KVK

Human Inside operates camera surveillance system activities in accordance with purposes, which are designated in applicable law, and personal data processing conditions, which are designated in KVK Law, for the purpose of providing the security of building and facilities.

8.1.3. Announcing The Usage of Camera Surveillance System

Personal data owner is enlightened by Human Inside in accordance with Article 10 of KVK Law. Prevention of harming fundamental rights and freedoms of personal data owner, principle of transparency and enlightenment of personal data owner is aimed.

Hereby policy is published (online policy regulation) in website of Human Inside and notifiers are hung in entrance of recorded fields intended for camera surveillance activities of Human Inside.

8.1.4. The Purpose of Camera Surveillance System and Being Restrained by The Purpose

Human Inside processes personal data related to processing purposes in accordance with Article 4 of KVK Law.

The purpose of operating camera surveillance activities is limited with purposes that designated in hereby Policy. In this respect, recording activities (recording locations, periods) are operated limited to this purpose. Fields which cause indecent exposure of people (for example, toilets) are not recorded.

8.1.5. The Security of Obtained Data

Necessary technical and administrative precautions (See Chapter2/Title 2.1) are taken in order to protect personal data in accordance with Article 12 of KVK Law.

8.1.6. Preserving Period of Data Obtained by Camera Surveillance System

More detailed information about the preserving periods of personal data which obtained by camera surveillance activities is given in hereby Policy article 4.3. named PRESERVING PERIODS OF PERSONAL DATA.

8.1.7. Who Can Access The Data Obtained By Camera Surveillance System and Whom The Data is Conveyed?

Only limited Human Inside employees have the access to live camera and records. Limited people who have access to records declare that they will protect the confidentiality of data.

8.2. MONITORING IN AND OUT OF THE BUILDING AND FACILITIES OF HUMAN INSIDE

Personal data processing activities are operated related to following in and out of visitors in Human Inside buildings and facilities with the purpose of providing security with the purposes specified in hereby policy by Human Inside.

Personal data owners are enlightened in this context via while obtaining names and surnames of visitors, texts that informing visitors. Data which are obtained for the purpose of following visitor in and outs are only processed for this purpose and related data are recorded in recording system physically.

8.3. PRESERVING THE RECORDS OF INTERNET ACCESS PROVIDED TO VISITORS IN BUILDING AND FACILITIES OF HUMAN INSIDE

Internet Access can be provided for demanding visitors during their visit in building and facilities with the purposes of providing security and purposes specified in hereby policy by Human Inside. In this case, log records about your internet access are recorded in accordance with 5651 numbered Law and mandatory provisions of this law; these records are only processed when it is requested by authorized state institutions and organizations or fulfilling Human Inside's obligations during supervision processes.

Human Inside employees who have access to aforementioned records only access data, only if there is a demand from authorized state institutions and organizations or to use in supervision processes and share them with legally authorized people. Limited people who have access to records declare that they will protect the confidentiality of data by recognizance of confidentiality.

8.4. WEBSITE VISITORS

Internet logs of visitors in websites are recorded in order to provide their visits within their purpose; showing them privatized content and operate online advertising actions by using technical methods (For example cookies) in Human Inside's websites.

More detailed information is given in "Human Inside Website Confidentiality Policy" part related to the actions.

9. CHAPTER – 9 CONDITIONS OF DELETING, EXTERMINATING AND ANONYMIZING OF PERSONAL DATA

Personal data are deleted, exterminated or anonymized in case of disappearance of the reasons, which required data processing, upon the demand of Human Inside or personal data owner in accordance with Article 138 of Turkish Criminal Law and Article 7 of KVK Law

9.1. HUMAN INSIDE'S OBLIGATION OF DELETING, EXTERMINATING AND ANONYMIZING

Personal data are deleted, exterminated or anonymized in case of disappearance of the reasons, which required data processing, upon the demand of Human Inside or personal data owner in accordance with Article 138 of Turkish Criminal Law and Article 7 of KVK Law. In this respect, Human Inside fulfills its obligation by methods which are designated in this chapter.

9.2. TECHNIQUES OF DELETING, EXTERMINATING AND ANONYMIZING PERSONAL DATA

9.2.1. Techniques of Deleting and Exterminating Personal Data

Personal data can be deleted, exterminated or anonymized in case of disappearance of the reasons, which required data processing, upon the demand of Human Inside or personal data owner in accordance with Article 138 of Turkish Criminal Law and Article 7 of KVK Law. Mostly used deleting or exterminating techniques used by Human Inside are listed below:

(i) *Physical Destruction*

Personal data can be processed in nonautomated methods only if they are part of a data entry system. While these data are being deleting/exterminating system of making them nonutilizable is used.

(ii) *Secure Deletion Software*

While data, which are processed wholly or partially with automatic methods and preserved in digital media, are being deleted/exterminated: methods related to deleting personal data from related software completely by means without recovering possibility, are used.

(iii) Sending to a Specialist for Secure Deletion

Human Inside may hire a specialist in order to delete personal data. In this case, Personal data are securely deleted/exterminated by means without recovering possibility.

9.2.2 Techniques of Anonymizing Personal Data

Anonymizing personal data means rendering personal data to unidentified data. Human Inside can anonymize personal data in case of the disappearance of reasons which require personal data processing.

Anonymized personal data can be processed with purposes of researching, planning, statistics in accordance with Article 28 of KVK Law. These kinds of processings are out of the context of KVK Law so, express consent of personal data owner is not required. Because personal data, which are processed by anonymizing, are out of the context of KVK Law, rights which are specified in the 10th chapter of this policy are not applied. Mostly used anonymizing techniques used by Human Inside are listed below:

(iv) Masking

Method of anonymizing personal data by removing key determinant information of personal data from data set by Data Masking.

Example: Making impossible personal data to be identified by removing information of personal data owners that help them to be identified such as name, T.R. Identity number.

(v) Aggregation

Many data are aggregated with aggregation method and making personal data unidentifiable with any person.

Example: Putting forth there are up to Z people in X age without specifying ages of employees one by one.

(vi) Data Derivation

More general content than the content of personal data and making personal data unidentifiable with any person by Data Derivation Method

Example: Putting forth ages instead of birth dates; putting forth resident territory instead of open address.

(vii) Data Shuffling (Data Permutation)

Breaking the bond between values and people by shuffling values in personal data set by Data Shuffling Method.

Example: Making voice records unidentifiable with personal data owner by changing the quality of voice records.

10. CHAPTER 10– THE RIGHTS OF PERSONAL DATA OWNERS; THE METHODOLOGY OF USING AND EVALUATING OF THESE RIGHTS

Human Inside informs personal data owner about their rights in accordance with Article 10 of KVK Law and leads personal data owner about how these rights will be exercised and Human Inside, manages necessary means, internal process, administrative and technical regulations in accordance with Article 13 of KVK Law in order to inform personal data owner.

10.1 RIGHTS OF THE DATA OWNER AND USING THESE RIGHTS

10.1.1. Rights of Personal Data Owner

Personal data owners have the rights listed below:

- (1) Learning whether personal data is processed or not,
- (2) If personal data is processed, requesting information related to it,
- (3) Learning purpose of processing personal data and whether it is used relevantly or not,
- (4) Knowing the third parties, who are imparted with personal data in domestic or abroad,
- (5) Requesting the correction of personal data in case they are deficiently or wrongly processed,
- (6) Even if personal data is processed in accordance with KVK Law and applicable law, in case the disappearance of the reasons which requires data processing, requesting deleting or exterminating of data and informing third parties about the process.
- (7) Opposing it in case of the emergence of a consequence against people by analyzing their processed personal data with exclusively automatic systems,
- (8) Requesting the absorption of loss if personal data is processed illegally and sustaining loss because of this reason.

10.1.2. Circumstances That Data Owner Can Not Demand

Personal data owners can not demand their rights, which were specified in 10.1.1. in situations listed below are excluded in article 28 of KVK Law.

- (1) Processing personal data with purposes of researching, planning and statistics by anonymizing them with official statistics.
- (2) Processing personal data in the context of art, history, literature or scientific purposes or freedom of speech only if not violating national defense, public safety, public order, economical safety, privacy of private life or personal rights.
- (3) Processing personal data in context of preventive, protective and informative activities, which are operated by legally authorized state institutions and organizations intended for providing national defense, public safety, public order or economical safety.
- (4) Processing personal data related to investigation, prosecution, adjudication or execution operations by judicial offices and courts.

Personal data owners can not demand their other rights, which were specified in 10.1.1., except retrieving loss right, in accordance with Article 28/2 of KVK law.

- (1) Necessity of data processing in order to prevent crime or criminal investigation.
- (2) Processing personal data, which were publicized by personal data owner.
- (3) Necessity of personal data processing in order to fulfill duty of supervision or regulation and investigation and prosecution of discipline by the force of law by authorized state institutions and organizations and professional organizations with public institution status.
- (4) Necessity of personal data processing in order to protect economical and financial profits of government in related to issues about budget, tax and finance.

10.1.3. Usage of The Rights By Data Owner

Personal data owners can convey their requests related to the rights which are listed in this chapter's 10.1.1. title by filling and signing Application Form with documents and information which certify their identity and methods listed below or other methods which designated by The Council of Personal Data Protection in free of charge.

- (1) After filling the form in www.humaninside.net sending a copy of it with wet sign by personally or via notary to www.humaninside.net adress.
- (2) After filling the form in www.humaninside.net , signing it with secure e-signature, which is in context of 5070 numbered Electronic Signature Law, sending the form to info@humaninside.net with a registered e-mail address

There has to be **special power of attorney**, which is regulated by personal data owner in the name of third party via notary, in order to third parties apply in the name of personal data

owners.

10.1.4. Complaint Right of Personal Data Owner to The Council of KVK

Personal data owners can make a complaint to The Council of KVK in the case of rejection of their application due course of Article 14 of KVK Law, disqualifying information or not being responded in time; from the date getting Human Inside's answer to in 30 or in any case 60 days.

10.2. RESPONDING OF HUMAN INSIDE TO APPLICATIONS

Applications about data processing activities of Community Companies are has to be made to related Community Companies. To make an application to Human Inside, Human Inside should be designated as data officer in the context of KVK Law. This situation is only accepted in case of Human Inside directly obtains personal data from related person or in situations that data sharing between related Community Company and Human Inside is accepted as data sharing between data officer to data officer in the context of KVK Law. Except these situations, applications about personal data processing activities which related Community Company is accepted as data officier, have to be made to Community Company.

10.2.1. Human Inside's responding method and period to applications

In case personal data owner conveys his or her demand in accordance with the method in this chapter's 10.1.3. title, Human Inside will conclude the related application in free of charge, mostly in 30 days by the quality of demand. However, if there is a cost specified by The Council of KVK, the cost, which is specified by The Council of KVK, will be obtained from application owner by Human Inside.

10.2.2. Information Which Are Requested from Personal Data Owner in Applications by Human Inside

Human Inside may request information about application owner in order to determine whether owner is personal data owner or not. Human Inside may address question to personal data owner in order to clarify particulars, which are in the application of personal data owner.

10.2.3. Human Inside's Right of Rejecting the Application of Personal Data Owner

Human Inside can reject the application of application owner in the cases listed below by showing reasons:

- (1) Processing personal data with the purposes of researching, planning, statistics by anonymizing them with official statistics.
- (2) Processing personal data in the context of art, history, literature or scientific purposes or freedom of speech only if violating national defense, national security, public safety, public order, economical safety, confidentiality of private life or personal rights or constituting a crime.
- (3) Processing personal data in the context of preventive, protective and informative actions, which are operated by authorized by law state institutions and organizations intended for providing national security, public safety, public order or economical safety.
- (4) Processing personal data by judicial offices or courts related to enquiry, prosecution, adjudication or execution processes.
- (5) Necessity of personal data processing in order to prevent crime or being necessary for criminal investigations.
- (6) Processing personal data which are publicized by personal data owner.
- (7) Necessity of processing personal data in order to officiate supervision or regulation obligations or disciplinary proceeding or prosecution by authorized state institutions and organizations or professional organizations with public institution status.
- (8) Necessity of personal data processing in order to protect economical and financial profits of government in related to issues about budget, tax and finance.
- (9) The possibility of hindering other people's rights and freedoms of personal data owner's demand.
- (10) Demands that requires effort out of proportion.
- (11) Requested information to be open to general public.

11. RELATIONSHIP BETWEEN THE POLICY OF PROTECTING AND PROCESSING PERSONAL DATA OF HUMAN INSIDE AND OTHER POLICIES

Human Inside forms basis sub-policies about protecting and processing aimed at internal usage but also forms basis policies for Community Companies.

It is aimed to inform related people in this context and providing transparency and accountability about data processing activities by reflecting bases of policy in a sufficient manner.

12. CHAPTER 12 – GOVERNANCE STRUCTURE OF HUMAN INSIDE'S PROTECTING AND PROCESSING PERSONAL DATA POLICY

Governance structure is created in order to act in accordance with KVK Law and Protection and Processing of Personal Data Policy.

Supreme Board of Protecting Personal Data (“Supreme Board”) and Committee of Personal Data Protecting (“Committee”) are created in order to practice hereby Policy and other policies related to it accordingly to top management of company within Human Inside.

Tasks of this Committee are listed below:

- Preparing and practicing changes about related basis policies about protecting and processing personal data and submit them to the approval of top management.
- Deciding how practice and supervision of policies about protecting and processing personal data will be held and, in this context, submitting the particulars of assignments and providing order to top management.
- Determining the particulars that required in order to be in accordance with KVK Law and applicable law, inspecting the practice and ensure the coordination and submit them to the approval of top management
- Increasing the awareness about protecting and processing personal data within Human Inside and organizations which are in cooperation with Human Inside.
- Taking necessary precautions by determining the possible risks of Human Inside’s personal data processing activities, submitting improvement suggestions to the approval of top management.
- Ensuring education arrangements for informing personal data owners about personal data processing actions and their legal rights respecting practice and dissemination of protecting personal data and policies.
- Conveying applications of personal data owners to Supreme Board in order to conclude
- Following improvements and regulations of protecting personal data; conveying suggestions to Supreme Board about the necessities.
- Managing relationships between The Council and Institution of KVK in tandem with Supreme Board.
- Practicing other duties which are assigned by Supreme Board and Company Management about protecting personal data.

APPENDIX - 1 DEFINITIONS

Express Consent	:	Consent which is expressed with free will, related to an issue, based on informing.
Anonymizing	:	Changing personal data in a way that makes data lose its personal data quality in an irrecoverable way. Ex: Masking, Aggregation, Data Derivation and Data Shuffling.
Application Form	:	Application form, which includes application of personal data owners for the purpose of using rights, in accordance with “6698 Numbered Protecting Personal Data Law”
Employee Candidate	:	Natural people who applied for a job in Human Inside or opened their background and related information for the inspection of Human Inside.
Shareholders and Officials of Cooperated Institutions	:	Natural people who work in institutions, which are in relationship with Human Inside about every business relation, including shareholders and officials.
Business Partner	:	Parties, which human inside built a business partnership with the purposes of conducting various projects with Human Inside itself or Community Companies, getting services while carrying out commercial activities.
Processing Personal Data	:	Every activity on data such as; obtaining personal data with fully or partially automatic or being a part of any other data record system, recording, storing, protecting, changing, reconfiguring, describing, conveying, taking over, making them obtainable, categorizing or hindering them to use.
Personal Data Owner	:	Natural people whose personal data is processed. For example; employee candidates.
Personal Data	:	Every kind of information related to identified or identifiable natural people. So, processing information of juridical people is not in the context of Law. For example; name-surname, T.R. identity number, e-mail, address, date of birth, credit card number etc.
Special Quality Personal Data	:	Race, ethnic origin, political opinion, philosophical belief, religion, sectarian or other beliefs, appearance, association foundation or union membership, health, sexual life, sentence and data about security precautions, biometric and genetic data.

Actionary	:	All-natural people who are actionist of Human Inside
Company Official	:	All-natural people who are member of Human Inside's Board of Management and other officials.

Supplier	:	Parties who contractually provides services to Human Inside in accordance with order and instructions of Human Inside while Human Inside carries out its commercial activities.
Community Company Client	:	Natural people whose personal data are obtained over their business relationship with Community Companies in the context of activities of Human Inside's work units regardless of there is a contractual relationship with Human Inside.
Third Party	:	Natural people, who are defined in a different way and whose personal data are processed in the context of Policy, (For ex: Guarantor, companion, family members and kinsmen, former employees)
Data Processor	:	Natural and juridical people who process data in the name of data owner by authority of data owner. For example, cloud computing company which stores Human Inside's data, call-center company who makes voice calls in the context of scripts.
Data Official	:	People, who determines purposes and means of data processing, manages the place (data recording system) in which data are stored in a systematic way,
Visitor	:	Natural people who entered Human Inside's physical location and facilities for various purposes and who visit our websites.

APPENDIX - 2 ABBREVIATIONS

KVK Law	:	Published in 7 April 2016 and 29677 numbered Official Gazette, 24 March 2016 dated and 6698 numbered Law of Protecting Personal Data.
The Constitution	:	Published in 9 November 1982 and 17863 numbered Official Gazette, 7 November 1982 dated and 2709 numbered The Constitution of The Republic of Turkey
The Council of KVK	:	The Council of Protecting Personal Data
Institution of KVK	:	Institution of Protecting Personal Data
Human Inside/Company	:	Human Inside Incorporated Company
Community Company	:	Companies which are connected to Human Inside (one by one or all of them)
Policy	:	Human Inside's Policy of Protecting and Processing Personal Data
Turkish Criminal Law	:	Published in 12 October 2004 and 25611 numbered Official Gazette, 26 September 2004 dated and 5237 numbered Turkish Criminal Law.

APPENDIX - 3 SIGNIFICANT DATES IN TERMS OF THE ENFORCEMENT OF THE PROTECTION OF PERSONAL DATA LAW

7 April 2016	<p>By 7 April 2016, Human Inside acts in accordance with the terms listed below:</p> <ul style="list-style-type: none"> (i) General rules and principles about processing personal data (ii) Obligations related to enlightenment of personal data owners (iii) Obligations related to providing security of data
7 October 2016	<p>By 7 October 2016, terms listed below will be entered into force and Human Inside will act in accordance with these terms:</p> <ul style="list-style-type: none"> (i) Terms related to conveying personal data to third parties and overseas (ii) Terms related to exercising rights of personal data owner (learning whether personal data is processed or not, requesting information, knowing whom data is conveyed, requesting configuration) and making complaint to The Council of KVK.
7 April 2017	<p>By 7 April 2017;</p> <ul style="list-style-type: none"> (i) Express Consents, which are obtained legally before 7 April 2016, will be accepted as they are in accordance with KVK Law in case it is not opposed by personal data owner. (ii) Terms will be come into force related to KVK Law.
7 April 2018	<p>Personal data, which were processed before 7 April 2018, will be optimized to KVK Law, exterminated or anonymized by Human Inside till 7 April 2018.</p>

APPENDIX - 4 DATA PROCESSING OF EMPLOYEE CANDIDATES' PERSONAL DATA

GATHERING AND PROCESSING PERSONAL DATA	EXERCISING RIGHTS AND APPLICATION
<p>Personal data of employee candidates that gathered in recruitment and their special quality personal data gathered according to quality of job are processed with purposes, which are specified in 4.2. title and 7th chapter of this Policy and listed below:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Evaluating suitability of employee candidate's quality and experience for the open position. <input type="checkbox"/> In case it is necessary, controlling trueness of information, which are conveyed by employee candidate, or researching about employee candidate by getting into contact with third parties. <input type="checkbox"/> Contacting Employee Candidate about application and recruitment process or when applicable, contacting Candidate Employee for open position in domestic or abroad. <input type="checkbox"/> Fulfilling demands of applicable law or authorized institutions and organizations <input type="checkbox"/> Developing and enhancing principles of Human Inside. <p>Personal data of Employee Candidates can be gathered with methods and means listed below:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Digital Application form published in orthographical or electronic media. <input type="checkbox"/> Backgrounds, which are conveyed by e-mail, cargo, reference or similar 	<p>Employee Candidates can convey their demands, caused by their personal data owner rights, to Human Inside by methods which are specified in the 10th chapter of this Policy.</p>

methods, to Human Inside by Employee Candidates.

- Employment or Consultancy Companies

- With devices such as video conferance, telephone or face to face interview
- Checks in order to confirm the trueness of information,which conveyed by Employee Candidate, and researches of Human Inside.
- Recruitment tests, which are made by experienced specialists and determines personality traits.

