

GSG HUKUK\*

# Personal Data Protection and Processing Policy

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1.5

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## ABBREVIATIONS

<b>Constitution</b>	Constitution of Republic Turkey No. 2709 dated 7 November 1982, promulgated in Official Gazette No. 17863 dated 9 November 1982
<b>Data Controller</b>	A natural or legal person who defines the purpose and the means of the personal data processing and who is responsible for the who is responsible for the establishment and management of the filing system
<b>Data Processor</b>	A person, other than a person or unit who stores, protects and backs up data technically, who processes personal data upon receiving authorisation and instruction from data controller
<b>Data Subject / Data Subjects</b>	A natural person, such as employees, clients, business partner, shareholders, authorized persons, potential clients, employee candidates, interns, visitors, suppliers, employees of a business partners and other persons not mentioned here, whose personal data is processed
<b>Destruction</b>	Deletion, elimination or anonymisation of personal data
<b>EEA</b>	European Economic Area
<b>EU</b>	European Union
<b>Explicit Consent</b>	Consent that which is specific informed and based on free will
<b>GDPR</b>	EU General Data Protection Regulation
<b>PDPL</b>	Protection of Personal Data Law No. 6698, promulgated in the Official Gazette No. 29677 dated 7 April 2016
<b>Periodical Destruction</b>	The recurring, ex officio deletion, destruction or anonymisation of personal data in case the legal processing grounds prescribed by PDPL no longer exist
<b>Personal data</b>	Any information related to a person whose identified or identifiable
<b>Personal Data Anonymisation</b>	To render data in such a way that it can no longer be associated with an identified or identifiable person, even when the personal data is matched with other data
<b>Personal Data Deletion</b>	To delete personal data or to render data in such a way that the personal data is no longer accessible to or reusable for users
<b>Personal Data Processing</b>	Any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system
<b>Recording media</b>	Any medium containing personal data processed which is processed by wholly or partly automated means provided it is a part of a data recording system
<b>Regulation on Deletion, Elimination and Anonymisation of Personal Data</b>	Regulation on deletion, elimination and anonymisation of personal data, promulgated in Official Gazette No. 30224 dated 28 October 2017 and which entered into effect as of 1 January 2018
<b>Special Categories of Personal Data</b>	Personal data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing,

	membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics
<b>The Authority</b>	Personal Data Protection Authority
<b>The Board</b>	Turkish Personal Data Protection Board

## **1. PURPOSE**

We, GSG Hukuk, are aware of our responsibility to protect personal data, the security of which is a constitutional right, and to provide a constitutional guarantee of this, and we place importance on using your personal data securely.

The purpose of this Policy is to regulate the methods and principles to follow to ensure that GSG Hukuk processes personal data in line with the Law on the PDPL.

## **2. SCOPE**

This Policy applies to all activities regarding the processing and protection of personal data by GSG Hukuk.

This Policy concerns all the processed personal data of our partners, officials, employees, officials and partners of our clients, employees, officials and shareholders of institutions with which we cooperate and third parties.

In this context, the purposes and principles for the processing of personal data are explained in detail by the published privacy notices or in the explanations included in the relevant applications. While interpreting this Policy, the aforementioned privacy notices and other procedures and documents regarding the processing of personal data. This document is not, in any way, deemed as a privacy notice and is the general policy of GSG Hukuk regarding personal data.

## **3. IMPLEMENTATION OF THE POLICY**

GSG Hukuk principally has different policies that deal with data protection in relation to certain functions and business activities. This Policy does not invalidate other data protection conditions in GSG Hukuk's other different policies, which foresee additional data protection conditions, or conditions which provide the same standards determined by this Policy to ensure the protection to the personal data. This Policy invalidates the data protection terms in GSG Hukuk's different policies if it contains additional terms or demands higher standards for the protection of personal data.

The relevant legislation in effect for the processing and protection of personal data will be applied principally. If there is a conflict between legislation and terms of this policy, GSG Hukuk accepts that the current legislation will prevail.

The Policy is made up of GSG Hukuk practices reviewed in light of the relevant legislation.

- (1) Data controller must take all necessary technical and organizational measures for providing an appropriate level of security in order to:
- a) ensure personal data isn't processed illegally,
  - b) ensure personal data isn't accessed illegally,
  - c) safeguard personal data,

The main sources of GSG Hukuk's obligations regarding data protection are:

- PDPL
- GDPR in the cases of processing personal data within EEA

## **4. ISSUES CONCERNING PROTECTION OF PERSONAL DATA**

GSG Hukuk informs the data subjects about the processing of personal data in accordance with the applicable laws.

GSG Hukuk conducts the necessary risk analyses identifying the risks that may arise regarding the protection of personal data and takes the necessary technical and administrative measures to ensure the appropriate level of security to prevent unlawful processing of personal data being processed in accordance with Article 12 of the PDPL, to prevent unlawful access to personal data and to ensure the protection of personal data.

The main measures taken are listed below.

- All activities carried out by GSG Hukuk have been analyzed in detail for all business units and a process-based personal data processing inventory has been prepared as a result of this analysis. Risky points in this inventory are identified and necessary legal and technical measures are taken continuously.

*(For example, the documents that need to be prepared within the scope of PDPL are prepared by taking into account the risks in this inventory)*

- Personal data processing activities carried out by GSG Hukuk are audited by information security systems, technical systems and legal methods.

- Personnel specialized in technical issues are employed.

- GSG Hukuk has set provisions regarding privacy and data security in the employment contracts to be signed during the recruitment process, the principles and legislation to be complied with regarding personal data. Employees are regularly informed and trained to raise awareness and take necessary measures regarding the PDPL. The roles and responsibilities of employees were reviewed in this context and job descriptions were revised. In addition, any violation of the PDPL by employees is regulated as a separate article in GSG Hukuk disciplinary procedures.

- Subcontractors are regularly informed and trained to raise awareness and take necessary measures regarding the PDPL.

- In terms of personal data processing activities carried out by GSG Hukuk and its subcontractors, necessary actions are taken to ensure that such data processing activities comply with the PDPL.

- The contracts concluded by GSG Hukuk contain the necessary provisions in terms of PDPL.

- Technical measures are taken in accordance with technological developments, and the measures taken are periodically checked, updated and renewed.

- Access authorizations are limited, and authorizations are regularly reviewed.

- The technical measures taken are regularly reported to the authorized person, the issues that pose a risk are reviewed and efforts are made to produce the necessary technological solutions.

- Software and hardware including virus protection systems and firewalls are installed.

- Backup programs are used to ensure that personal data is stored securely.

- Security systems are used for storage areas, technical measures taken are periodically reported to the relevant person as required by internal controls, and necessary technological solutions are produced by re-evaluating the issues that pose a risk. Files/outputs stored in the physical environment are stored through the supplier companies GSG Hukuk works with and then destroyed in accordance with the specified procedures.

- GSG Hukuk's systems are brought into compliance with the GDPR.

- In order to be vigilant against any personal data security breaches, crisis and reputation management processes and procedures are planned.

## **5. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA**

GSG Hukuk carries out the necessary activities to ensure the lawful processing and security of special categories of personal data and takes all appropriate technical and administrative measures to ensure compliance with legal requirements and adequate measures determined by the Board in order to ensure the lawful processing of such data.

## 6. PERSONAL DATA PROTECTION AND PROCESSING POLICY

### 6.1 Principles For Processing Personal Data

GSG Hukuk processes all personal data in line with PDPL and the relevant legislation. As per PDPL Article 4, GSG Hukuk processes the personal data in conformity with the law and good faith, in a manner which is accurate and if necessary, up to date, specific, clear and legitimate purposes and in a fashion that is limited, proportionate and related to the purpose.

**Being in Conformity with the Law and Good Faith:** GSG Hukuk acts in line with the principles stemming from legal regulations, general trust, and good faith to process personal data. In this scope, GSG Hukuk considers the requirements of proportionality when processing personal data and does not utilize the data for reasons other than what the purpose requires.

**Ensuring The Personal Data Are Accurate and if Necessary, Up to Date:** By taking into the consideration the basic rights of the data subjects and its own legitimate interests, GSG Hukuk ensures the processed personal data are accurate and if necessary up to date.

**Processing For Specific, Clear and Legitimate Reasons:** GSG Hukuk explicitly and clearly defines its legitimate and legal purpose for processing personal data. GSG Hukuk processes personal data in relation to the products and services it provides and only as much as is necessary. GSG Hukuk clearly states the purpose for processing personal data before personal data processing begins.

**Processing Personal Data Relevant, Limited and Proportionate to The Purposes Of The Processing:** GSG Hukuk processes personal data in a manner that allows for carrying out the specified purposes and avoids processing personal data that is unrelated to the purpose or unnecessary.

**Storing For No Longer Than Is Predetermined in The Related Legislation or Is Necessary for The Purposes of Processing:** GSG Hukuk stores personal data for as long as defined in the relevant legislation or necessary for its purpose. In this scope, GSG Hukuk determines whether a duration for keeping the personal data is laid out in the relevant legislation. If a duration period is specified, GSG Hukuk abides by this duration. If not, GSG Hukuk keeps the personal data for as long as is necessary for the purpose for which the personal data was collected. When the retention period of the personal data ends or the reasons for processing the data disappear, GSG Hukuk deletes, disposes of or anonymizes the personal data.

GSG Hukuk,

**Collection:** May only collect personal data in relation to the business of one or more GSG Hukuk companies, for pre-defined and lawful purposes.

**Processing:** May only processes personal data if it has a basis for processing the data within the scope of the applicable legislation and the purpose for which the data was obtained is compliant with the law and fair.

**Data Minimisation:** May collect and process personal data in accordance with the processing purposes of personal data, related and limited to these purposes.

**Retention:** May retain personal data only:

- i. as required or permitted by law,
- ii. as required by professional standards or policies,
- iii. for as long as it is necessary for GSG Hukuk's use of the data.

GSG Hukuk deletes, destroys or permanently anonymizes all other personal data it uses.

**Transfer:** Can transfer personal data only in accordance with applicable laws and specifically EEA data can be transferred to third parties under the following conditions.

GSG Hukuk has a lawful basis for doing so and the transfer is to:

- a third-party controller in the EEA or a whitelist jurisdiction that has entered into a binding commitment to restrict its processing of the personal data to an agreed purpose and to implement appropriate technical and organizational measures to protect the personal data from unauthorized processing or
- a third-party controller located neither in the EEA nor in safe countries, provided that the third-party controller has signed the standard contractual clauses published pursuant to EU Commission Decision 2021/914/EC of 4 June 2021 (or any other document that may replace it) or the standard data protection clauses adopted by the EU Commission pursuant to Article 46(2) of the GDPR or has fulfilled any of the conditions set out in point (6.1.2) below
- a third party processor that has provided sufficient guarantees to implement appropriate technical and organizational measures to enable the GSG Hukuk to meet the requirements of this policy and entered into a binding commitment and, if the third party processor is in neither the EEA nor a white list jurisdiction, the third party processor has entered into the standard contractual clauses in EU Commission Decision 2021/914/EC of 4 June 2021 (or superseding instrument) or standard data protection clauses adopted by the EU Commission under Article 46(2) of the GDPR or one of the conditions in section 3.3.2 has been met.
- the transfer is necessary to comply with a requirement of law.

The conditions referred to above for the transfer of EEA personal data to a third party controller or a third party processor without the safeguards provided by the EU standard contractual clauses are:

- a. the data subject expressly consents to the relevant transfer after being informed about the possible risks that may arise in the absence of the appropriate safeguard and measures; or
- b. the transfer is necessary:
  - i. for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request
  - ii. for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
  - iii. the conclusion or performance of a contract between the data controller and another natural or legal person for the benefit of the Data Subject
  - iv. necessity for a substantial public interest,
  - v. necessity for the establishment, protection or exercise of a right
  - vi. To protect the vital interests of the data subject and another person in cases where the data subject cannot give consent due to physical or legal reasons
  - vii. the transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that



the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case.

### **6.2 GSG Hukuk's Purposes for Processing Personal Data**

GSG Hukuk processes personal data in accordance with the law and good faith, for specific, explicit and legitimate purposes, limited and proportionate to the processing purpose. GSG Hukuk notifies the purposes for which personal data will be processed through the privacy notices submitted to the data subjects during the collection of the personal data.

### **6.3 GSG Hukuk's Legal Reasons for Processing Personal Data**

GSG Hukuk processes personal data within the scope of the personal data processing conditions specified in Article 5 of the PDPL:

- Processing of personal data is expressly provided for by the laws
- Processing of personal data by GSG Hukuk is necessary, provided that it is directly related to the performance of the contract.
- Processing of personal data for complies with GSG Hukuk's legal obligation.
- It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- GSG Hukuk may process personal data in a limited way for the purpose of publicization if the personal data is made public
- It is necessary to process the data to establish, use or protect a rights
- It is necessary to process the data for its own legitimate interests (provided the basic rights and freedoms of the persons whose data is processed are not violated).

GSG Hukuk shall not process special categories of personal data without explicit consent of the data subject as a rule.

GSG Hukuk shall process personal data of special categories only in the presence of one of the following conditions specified in paragraph 3 of Article 6 of the PDPL.

- It is expressly provided for by the laws.
- It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- Personal data have been made public by the data subject himself/herself and in accordance with the intention of the data subject to make it public.
- Data processing is necessary for the establishment, exercise, or protection of any right.
- It is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning, management, and financing of health services by persons under the confidentiality obligation or authorized institutions and organizations.
- Mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance

Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes, provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; for current or former members and members or persons who are in regular contact with these organizations and formations

## **7. TRANSFERRING PERSONAL DATA**

### **7.1. Domestic Transfer of Personal Data**

GSG Hukuk transfers personal data domestically with the existence of one of the conditions specified in paragraph 2 of Article 5 of the PDPL or with the existence of one of the conditions set out in paragraph 3 of Article 6 of the PDPL, provided that adequate measures are taken if the personal data transferred is special categories of personal data.

In cases where such processing conditions do not exist, GSG Hukuk transfers personal data domestically by obtaining the explicit consent of the data subject. GSG Hukuk complies with the provisions of other laws regarding the transfer of personal data domestically.

### **7.2. Transfer of Personal Data Outside Turkey**

Within the framework of Article 9 of the PDPL, GSG Hukuk may transfer personal data outside Turkey;

- The existence of one of the processing conditions specified in the PDPL and the existence of an adequacy decision on the country, sectors within the country or international organizations to which the transfer will be made
- In the absence of an adequacy decision, in the presence of one of the processing conditions specified in the PDPL, provided that the person concerned has the opportunity to exercise his rights and apply for effective legal remedies in the country where the transfer will be made, with the existence of appropriate safeguards listed; (i) Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Turkey and the transfer is permitted by the Board, (ii) Existence of binding corporate rules approved by the Board containing provisions on the protection of personal data that companies within the group of undertakings engaged in joint economic activities are obliged to comply with, (iii) The existence of the standard contractual clauses announced by the Board which includes data categories, purposes of the data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, additional measures taken for special categories of personal data, (iv) Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.
- In the event that an adequacy and appropriate safe guards provided for by PDPL with the condition that it is incidental data controllers and data processors may only transfer personal data outside Turkey with the existence of the one of the following conditions: (i) The data subject gives explicit consent to the transfer, provided that he/she is informed about the possible risks, (ii) The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken upon the request of the data subject, (iii) The transfer is mandatory for the establishment or performance of a contract between the data controller and another natural or legal person for the benefit of the data subject, (iv) The transfer is mandatory for a substantial public interest, (v) It is necessary to transfer personal data for the establishment, exercise a right, (vi) It is necessary to transfer personal data for the protection of the life or physical integrity of the person or another person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid, (vii) Transfer of personal data from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with legitimate interests requests it.

GSG Hukuk complies with the provisions of other laws regarding the transfer of personal data abroad. In accordance with this paragraph to see the service providers GSG Hukuk's support please refer to <https://www.gsghukuk.com/en/hakimizda/external-service-providers.html>

## **8. GSG HUKUK PERSONAL DATA BREACH PROCEDURES**

In the event that the personal data it processes is unlawfully obtained by others, GSG Hukuk shall notify the Board without delay and within 72 (seventy-two) hours at the latest from the date it becomes aware of this situation. Following the determination of the persons affected by the data breach in question, GSG Hukuk also notifies the Data Subjects by appropriate methods as soon as reasonably possible. GSG Hukuk acts in accordance with the decision numbered 2019/10 published by the Board regarding the procedures and principles of personal data breach notification. GSG Hukuk has prepared and put into effect an Incident Response Plan regarding data breach processes.

## **9. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA by GSG HUKUK**

In the event that the reasons for the processing of personal data cease to exist, despite the personal data has been processed in accordance with the provisions of the relevant laws, Article 138 of the Turkish Penal Code and Article 7 of the PDPL prescribes the personal data in question is deleted periodically or upon the request of the Data Subject.

GSG Hukuk reserves the right not to fulfill the request of the Data Subjects in cases where GSG Hukuk has the right and/or obligation to retain personal data in accordance with the provisions of the relevant legislation.

When GSG Hukuk enters into an agreement with an individual or organization to process personal data on its behalf, the personal data is securely erased by these individuals or organizations in a manner that it cannot be recovered again.

GSG Hukuk is capable of anonymizing personal data that has been processed in accordance with the law once the reasons necessitating the processing of personal data no longer exist. The most commonly used anonymization techniques by GSG Hukuk are listed below:

### **(i) Masking**

Masking is a method of anonymizing personal data by removing the key identifying information from the data set.

### **(ii) Aggregation**

Through the data aggregation method, multiple pieces of data are aggregated, making personal data unassociated with any individual.

### **(iii) Data Derivation**

The data derivation method involves creating a more general content from the content of personal data, ensuring that the personal data cannot be associated with any individual.

### **(iv) Data Shuffling**

Data shuffling is a method where the values within a personal data set are mixed, breaking the link between the values and the individuals.

## **10. DATA PROTECTION OFFICER (DPO)**

GSG Hukuk has appointed a Data Protection Officer (DPO) to fulfill its obligations under the PDPL and GDPR.

## **11. JOINT CONTROLLERSHIP ON PERSONAL DATA**

In cases where GSG Hukuk acts as a joint data controller together with other GSG Hukuk firms, in order to comply with the requirements of this Policy, GSG Hukuk agreements which specify to the responsibilities about themselves, including the duties and responsibilities, GSG Hukuk has undertaken towards the Data Subjects.

When GSG Hukuk acts as a joint data controller with one or more third parties, in order to comply with the requirements of this Policy, GSG Hukuk agreements which specify to the responsibilities about themselves, including the duties and responsibilities, GSG Hukuk has undertaken towards the Data Subjects.

## **12. MANDATORY DATA PROTECTION IMPACT ASSESSMENT FOR EEA PERSONAL DATA**

This section shall only apply where GSG Hukuk processes EEA personal data. GSG Hukuk assesses the impact of data processing on the protection of EEA personal data before doing any of the following:

- a. systematic and extensive evaluation relating to data subjects based on automated processing (including profiling) which produces legal effects for the data subjects or similarly significantly affects them
- b. large scale processing of special categories of personal data or personal data relating to criminal convictions or offences
- c. large scale, systematic monitoring of a publicly accessible area
- d. Considering the nature, scope, context and purpose, personal data usage areas that may pose a high risk to the rights and freedoms of individuals in cases where new technologies are used.

GSG Hukuk seeks the counsel of the Data Protection Officer (DPO) regarding data protection impact assessment, which should (as a minimum) include:

- a. the purpose of the process, including the systematic description of the data processing and any legitimate interests pursued by the controlling party
- b. assessing whether it is necessary and proportionate based on the purpose of the data processing
- c. assessment of the risk to the rights and freedoms of data subjects
- d. Measures to address risk

According to the Data Protection Impact Assessment, if data processing poses a high risk to data subjects, GSG Hukuk will fulfill the obligations.

## **13. MINIMAL DATA PROTECTION REQUIREMENTS**

When personal data is processed in accordance with the instructions of the client or another third party, GSG Hukuk:

- a) may obtain, process and retain personal data only in accordance with the terms agreed upon with the client or the third party
- b) will not process personal data with another third party without the prior consent of the client or other third party. In case, Sub-processing includes the processing of EEA personal data, GSG Hukuk ensures that the conditions agreed upon with sub-processor are specified with and written agreement which includes the data protection obligations stated in this Policy.

## **14. HOW DO DATA SUBJECTS MAKE USE OF THEIR RIGHTS**

The individuals whose personal data are processed by GSG Hukuk have the right to apply to GSG Hukuk via the email address [info@gsg hukuk.com](mailto:info@gsg hukuk.com) to find out about the following regarding their personal data:

- a. To learn whether their personal data is being processed,

- b. To request information if their personal data has been processed,
- c. To understand the purpose of the data processing and whether the data is being used for the intended purposes,
- d. To know the third parties to whom the personal data is transferred, both domestically and internationally,
- e. To request the correction of personal data if it is processed incompletely or incorrectly,
- f. To request the deletion or destruction of personal data in case the reasons necessitating its processing no longer exist, despite being processed in accordance with the relevant laws,
- g. To request that the transactions made in accordance with clauses (d) and (e) are notified to the third parties to whom personal data has been transferred,
- h. To object to any result against the person arising from the analysis of the processed data exclusively through automated systems,
- i. To claim compensation for damages in case of harm due to the unlawful processing of personal data.

Requests for the use of rights within PDPL Article 11 are to be submitted in writing or to the [info@gsg hukuk.com](mailto:info@gsg hukuk.com) to electronic address via the Application Form on the "<https://www.gsg hukuk.com/tr/site-bilgisi/kisisel-verilerin-korunmasi-aydinlatma-metni/gsg-hukuk-kvk-politikasi-bilgi-formu.pdf>" link or with a secure electronic signature as defined in the Electronic Signature Law numbered 5070 or by using mobile signature or by using the e-mail address previously notified to the data controller by the data subject and registered in the data controller's system, it should be sent to the address [info@gsg hukuk.com](mailto:info@gsg hukuk.com) with the expression "Request for Personal Data Information" in the subject section.

<b>Date of Revision</b>	<b>Version</b>	<b>Changes</b>
September 2020	1.2	-
December 2022	1.3	The policy was reviewed and some wording changes were made.
June 2023	1.4	The policy was reviewed and some wording changes were made.
June 2024	1.5	Pursuant to the Law dated 12.03.2024 and numbered 32437 on the Amendment of the Criminal Procedural Law and Certain Laws, the Policy has been updated.

