	<b>EMPLOYEE DISCLOSURE TEXT</b>	Document No:	KVK.F002
		Effective Date:	01.10.2021
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This Disclosure Text has been prepared by VBT Yazılım A.Ş. ("Company"), the Data Controller residing at QUICK TOWER, İçerenköy Mh. Umut Sk. No:10-12 K:13 D:57-60 PK:34752 Ataşehir/İstanbul, in order to inform its employees and to fulfil the Disclosure Obligation within the scope of the Personal Data Protection Law No. 6698 (KVKK) and other relevant legislation.

Our Company's Policies and Disclosure Texts regarding the Protection of Personal data are available at <https://www.vbt.com.tr/en/page/personal-data-protection> .


## 1. PERSONAL DATA COLLECTION METHODS AND LEGAL REASONS

Your personal data specified below,

- i) **Identity Data:** Name, surname, mother-father's name, date of birth, T.R. identity number, gender, marital status, identity card series number, nationality information, passport information, position and title information, family relatives' information.
- ii) **Communication Data:** Phone number, e-mail address, address information, internal company communication information (company phone number, internal phone number, corporate e-mail address, registered e-mail address).
- iii) **Financial Data:** Bank IBAN number, payrolls, file and debt information regarding enforcement proceedings, private health insurance information.
- iv) **Education Data:** Educational status, in-service training information, certificate and diploma information, language information, courses attended, education and skills, work experience, transcript information.
- v) **Visual and Audio Data:** Photographs, camera recordings of real persons.
- vi) **Personal Data:** Payroll information, disciplinary investigations, employment entry and exit records, CV information, performance evaluation reports, insurance information, leave exit and return date, military service status information, department and unit.
- vii) **Special Personal Data:** Health report, blood group, personal health information, health and maternity leave documents, disability status information, device and prosthesis information used, criminal conviction and [security measures] related data.
- viii) **Other Data:** IP address information on corporate computers and website entry and exit records, vehicle license plate, accommodation and travel information, handwriting and signature, request and complaint information,

are collected in accordance with the relevant legislation through the following methods;

- By E-mail
- Through Cameras
- In writing
- Official Documents
- Physically (in person)
- Written Forms (company's printed forms)
- Through Personal Attendance System (PDKS)
- Through the Company's Website
- Verbally
- By Phone

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- Electronic Forms (in-company software forms)
- Human Resources Application
- Through Company Applications
- Through Cargo Shipments
- Organizations (Marketing, Training, etc. events)
- From Plaza Information Distribution Point
- From Other Activities
- From Other Units


and processed for the following legal reasons;

- For the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the relevant person
- To fulfil legal obligations
- For the establishment, exercise or protection of a right
- Personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract
- It is clearly specified for in the laws (Special personal data)
- Fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance (Special data)
- Explicit consent

## 2. PERSONAL DATA PROCESSING PURPOSES

Your personal data will be processed by the Company for the following purposes within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK:

- Fulfilment of Obligations Arising from Employment Contracts and Legislation for Employees
- Execution of Information Security Processes
- Execution of Side Rights and Benefits Processes for Employees
- Execution of Performance Evaluation Processes
- Execution of Audit / Ethics Activities
- Execution of Activities in Accordance with Legislation
- Provision of Information to Authorized Persons, Institutions and Organizations
- Execution of Finance and Accounting Affairs
- Ensuring the Security of Data Controller Operations
- Ensuring the Security of Movable Goods and Resources
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Ensuring the Security of Physical Space
- Execution of Occupational Health / Safety Activities
- Execution of Training Activities
- Execution of Emergency Management Processes
- Follow-up and Execution of Legal Affairs
- Execution of Access Authorizations

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- Execution / Supervision of Business Activities
- Execution of Contract Processes
- Execution of Insurance Transactions
- Planning of Human Resources Processes
- Execution of Assignment Processes
- Execution of Employee Satisfaction and Loyalty Processes
- Execution of Wage Policy
- Execution of Business Continuity Activities
- Execution of Communication Activities
- Organization and Event Management
- Execution of Company / Product / Service Loyalty Processes
- Execution of Customer Relationship Management Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Application Processes of Employee Candidates
- Execution of Purchasing Processes

### 3. PROCESSING OF SPECIAL PERSONAL DATA OF EMPLOYEES

The law specifies data that is separately regulated as “special personal data” and is subject to special protection. These data include data related to race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction and [security measures], as well as biometric and genetic data.

If the processing of special personal data is necessary due to the nature of the job or legal obligation, special personal data that falls within this scope may be processed as limitedly as possible.


Special Personal data may be processed under the Personal Data Protection Law in cases where the employee does not have explicit consent, under the following conditions:

- Special personal data of the employee other than his/her health and sexual life, only in cases stipulated by law,
- Special personal data of the employee regarding his/her health and sexual life, for the purposes of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and their financing, by persons or authorized institutions and organizations under a confidentiality obligation.

#### 3.1. Processing of Employee Health Data

Health data is among special personal data. Employees' health data, especially accident and illness report of employees, are stored separately from other personal data.

The implementation of mandatory health checks and health tests within the framework of the Occupational Health and Safety Law No. 6331 is carried out within the scope of Article 6/3 of the Personal Data Protection Law No. 6698. This health data is processed by persons under a confidentiality obligation, such as workplace physicians and OHS officers.

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#### **4. STORAGE PERIOD OF YOUR PERSONAL DATA**

In accordance with the provisions of the KVKK, when the purpose requiring processing of your personal data as per Article 7 of the KVKK is eliminated and/or the limitation periods required for us to process and store your data as per the legislation expire, your personal data will be deleted, destroyed or anonymized according to our Personal Data Storage and Destruction Policy.

#### **5. TO WHOM AND FOR WHAT PURPOSE CAN YOUR PERSONAL DATA BE TRANSFERRED**

Personal data of employees may be transferred or shared to the following institutions and abroad provided that sufficient and effective measures are taken in accordance with the data transfer and processing conditions specified in Articles 8 and 9 of the Law and the security and confidentiality principles specified in the legislation, suppliers, shareholders, authorized dealers, private law entities from which services are received (in matters such as security, training, audit, event and organization, health, occupational safety, law, etc.), independent auditing institutions, financial institutions, business partners at home and abroad, especially direct and indirect affiliates, storage, archiving, information technology support companies at home and abroad (server, hosting, program, cloud computing), legally authorized public institutions and private law entities.

#### **6. YOUR RIGHTS AS A PERSONAL DATA OWNER**

The Company discloses you of your rights in accordance with Article 10 of the Law and provides guidance on how to use these rights and carries out the necessary internal functioning, administrative and technical arrangements for all of these. In accordance with Article 11 of the KVKK, the persons whose Personal Data is collected has the rights;

- To learn whether their personal data has been processed,
- To request information about their personal data if it has been processed,
- To learn the purpose of processing their personal data and whether it is used in accordance with its purpose,
- To know the third parties to whom their personal data has been transferred domestically or abroad,
- To request correction of their personal data if it has been processed incompletely or incorrectly,
- To request the deletion or destruction of their personal data within the framework of the conditions stipulated in Article 7 of the Law,
- To request that the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law be notified to third parties to whom their personal data has been transferred,
- To object to the emergence of a result against the person by analysing the processed data exclusively through automated systems,
- To request compensation for the damages incurred due to the processing of their personal data in violation of the KVKK.

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### **6.1. Method of Using the Rights of the Personal Data Owner,**

The personal data owner must send their application regarding their personal data to:

VBT Yazılım Anonim Şirketi

QUICK TOWER, İçerenköy Mh. Umut Sk. No:10-12 K:13 D:57-60

34752 Ataşehir/İstanbul

in writing and with a wet signature or to our registered e-mail address [kvkk@vbt.com.tr](mailto:kvkk@vbt.com.tr) with a secure electronic signature.

The application must include; for Republic of Turkey citizens, Turkish Republic Identity Number, for foreigners Nationality, Passport number and Turkish Identity number if any, subject of the request, name, surname, place of residence or workplace address for notification, e-mail address for notification if any, telephone and fax number and signature. All Information and related documents about the subject should be added to the application.

It is not possible for third parties to make a request on behalf of personal data owners.

In order for a person other than the personal data owner to make a request, there must be a copy of the notarized power of attorney issued by the personal data owner on behalf of the person who will make the application.

### **6.2. The Company's Response Method and Time to Applications**

In written applications, the date on which the document is notified to the data controller or its representative will be taken as the application date. In applications made by other methods, the date on which the application reaches the data controller will be taken as the application date. The application depending on the nature of the request will be finalized within thirty days at the latest, free of charge. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board/Kurul may be charged.

If our Company suspects the identity of the applicant, it may request verification information from the relevant person

### **6.3. Right of Data Owner to Complain the Company to the Board/Kurul.**

if your application is rejected by our Company or if you find our response insufficient or if we do not respond to your application on time; Data Owner can complain the Company to the Board/Kurul within thirty days from the date you learn of our Company's response or in any case within sixty days from the date of application according to Article 14 of the KVKK.