



SCA CERTIFICATION AND PRIVATE TRAINING SERVICES LTD. CO.

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EMPLOYEE INFORMATION NOTICE REGARDING THE PROTECTION OF PERSONAL DATA PURSUANT TO THE LAW ON THE PROTECTION OF PERSONAL DATA NO. 6698 ("KVKK")

Registered in Turkey at Küçükçiğli Mah. 8785/1 Sokak No:17, Çiğli/İZMİR, with MERSIS number 0757039609600013, taxpayer of Çiğli Tax Office with tax number 7570396096, SCA CERTIFICATION AND PRIVATE TRAINING SERVICES LTD. CO. ("Company"), hereby informs you that your personal data obtained in the circumstances set out below,

- within the scope of our commercial relations or within the framework of our employment relationship with you;
- for purposes that require processing and limited to the extent necessary and proportionate to such purposes;
- by ensuring that your personal data, as notified to us or as recorded, is accurate and up to date,

shall be recorded, stored, preserved, reorganized, shared with institutions authorized by law to request such personal data, and transferred to domestic or foreign third parties under the conditions stipulated by the KVKK, transferred, classified, and processed in other ways as specified in the KVKK.

PROCESSED PERSONAL DATA

Personal data provided to us by employees themselves may be processed. By way of example, your personal data that may be subject to processing are as follows:

Identity Data

Name, surname, date of birth, country of birth, city of birth, gender, marital status, nationality, Turkish identity card information (TCKN, serial number, ID number, father's name, mother's name, place of birth, province, district, neighborhood, volume number, family order number, order number, household number, page number, registry number, place of issue, reason for issue, date of issue, previous surname), copy of identity card.

Contact Data

Phone number, full address, e-mail address, internal company contact information (extension number, corporate e-mail address).

Financial Data

Financial and salary details, payrolls, premium entitlements, premium amounts, information related to enforcement files and debts, bank account booklet, minimum living allowance information, private health insurance amount.

Special Category Personal Data

Union membership, status of being an ex-convict/criminal record, disability status/definition/percentage, religion, health data, blood type, private health insurance policy, health reports, workplace health reports, lung X-ray, hearing test, eye test, entry and periodic examination forms signed by the workplace doctor, pregnancy status, pregnancy report, health and maternity leave information, association/foundation memberships.



Education Data

Educational status, certificate and diploma information, foreign language skills, education and skills, CV, courses attended.

Visual and Audio Data

Personal photos, voice recordings, camera recordings.

Employee Performance and Career Development Data

Education and skills, information about trainings received on certain dates, e-mails, signed attendance forms, customer interview quality evaluation forms, monthly performance evaluations and target achievement status, activity information.

Family and Relatives Data

Marriage certificate; spouse's and children's names, surnames, Turkish ID numbers, gender, date of birth, height, weight, duties, phone numbers; names, surnames, and phone numbers of relatives.

Employment Data

Personnel number, job title, department and unit, position, last date of employment, employment entry/exit dates, social security registration/retirement, allocation number, social security number, tax office number, flexible working status, holding personnel number, travel status, pension fund, pension fund entry date, pension fund number, Bağ-Kur entry date, Bağ-Kur number, accounting code, number of working days, projects worked on, monthly total overtime information, severance pay base date, severance pay additional days, strike days.

Leave Data

Leave base date, additional leave days, leave group, departure/return dates, days, reason for leave, address/phone number during leave.

Other

Military deferment, vehicle license plate, vehicle registration copy, vehicle mileage information, vehicle location, driver's license copy, traffic fine inquiry result, private fund name, private fund entry date, private fund number, shoe size, clothing size, height, weight, status as a martyr's relative, internship status, shuttle used, stop used, employee internet access logs, entry-exit logs, workplace entry-exit records, employee daily activity data.

METHOD OF COLLECTION AND LEGAL REASON FOR YOUR PERSONAL DATA

As an employer, in order to fulfill our legal obligations, for the performance of our employment contract, for reasons stipulated in laws, and due to the Company's legitimate interests, we collect your personal data through the following means: directly requested from you; previously requested during your job application via our platform or other employment platforms; or the CV and other texts you chose to share with us during your application. Data may also be collected when you submit information to us physically or electronically, or when you enter data into Company computer programs, applications, and servers open to multiple users, or into the internet accessible by third parties.

In order to ensure business tracking for the Company's legitimate interests, we collect data through systems that monitor entry and exit times; in order to ensure workplace security and fulfill our legal obligations, we collect data regarding your use of vehicles and fuel consumption via tracking devices installed in Company vehicles provided to you.



For the Company's legal obligation and legitimate interest in ensuring workplace security, we collect data via cameras installed in Company premises.

For the Company's legitimate interest in ensuring employees provide effective customer support, we collect voice recordings through call recording software.

For the fulfillment of our legal obligation and as required by law, we collect your health data through our workplace doctor, and for ensuring workplace security, through physical or electronic means from the building management.

We collect data through legal documents and notifications submitted to us to fulfill our legal obligations.

For the Company's legitimate interest in improving its platform and making it more effective, we collect personal data through cookies used on our website, as detailed in our Cookie Policy.

PURPOSES OF PROCESSING YOUR PERSONAL DATA

The Company may process your personal data for the following purposes and legal reasons, including but not limited to:

For the performance of the employment contract, in particular:

- Employee leave approvals, displaying leave balances, and making leave arrangements.
- Processing employee terminations.
- Payroll processing.
- Making salary payments to employees.

For fulfilling requirements under the Labor Law, Occupational Health and Safety Law, Social Security Law, relevant legislation, and other laws and regulations, in particular:

- Creating personnel files.
- Notifications to SGK (Social Security Institution), İŞKUR, police, as well as providing legal incentives and obligations information.
- Opening mandatory private pension accounts.
- Controlling employee entry-exit records and matching R&D camera recordings with door entry-exit records.
- Calculating R&D incentives.
- Executing salary garnishment payments for enforcement files.
- Making legal notifications of occupational accidents.
- Executing occupational health and safety procedures.
- Complying with legal retention, reporting, and notification obligations required by legislation, regulatory bodies, and other authorities.
- Enforcing court orders.

For ensuring security within the Company, in particular:

- Ensuring workplace security.
- Ensuring employee entry-exit into the building where the Company headquarters is located.

For requirements arising from the performance of customer contracts, in particular:

- Handling customer complaints, distinguishing justified/unjustified cases, improving customer satisfaction,



understanding customer needs, and improving customer-related processes.

- Evaluating service quality to customers and providing training to employees.

For the administration of the Company, execution of business, and implementation of company policies, in particular:

- Monitoring and reporting employee performance.
- Making employee expense payments.
- Entering employee data into the Company system and creating employee profiles, updating existing data.
- Ensuring communication with employees.
- Verifying that employees provided with or using company vehicles are eligible to drive and have not lost their licenses for any reason.
- Providing vehicles to employees and arranging parking spaces.
- Printing business cards.
- Ensuring packages delivered via cargo/courier reach the relevant employee.
- Monitoring company vehicle usage for employee safety and business execution.
- Organizing shuttle and travel arrangements.
- Entering employee data into Outlook to create business e-mails.
- Conducting research projects related to employees.
- Monitoring employee entry and exit times.
- Managing bulk e-mailing for campaigns and promotions.
- Recording documents collected during employee recruitment and interviews.
- Ensuring communication for congratulatory purposes.
- Planning training, reporting training, preparing training certificates, monitoring participation in trainings, monitoring employee development processes resulting from trainings.
- Ensuring quality control.
- Providing communication with relevant persons in case of emergencies.
- Providing support to employees.
- Conducting satisfaction survey analysis.

Your personal data will be stored for the maximum period stipulated in the relevant legislation or required for the purposes for which they are processed, and in any case for the legal statute of limitations.

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES IN TURKEY

For your security and to fulfill our Company's legal obligations, your personal data may be shared with public institutions and organizations authorized by law, such as the Labor Law, Occupational Health and Safety Law, Social Insurance and General Health Insurance Law, the Law on the Regulation of Publications on the Internet and Combating Crimes Committed Through Such Publications, the Turkish Commercial Code, the Turkish Code of Obligations, the Law on the Protection of Personal Data No. 6698, the Law on Identity Notification, and other legislation, including but not limited to: the Personal Data Protection Authority, the Ministry of Finance, the Ministry of Customs and Trade, the Ministry of Labor and Social Security, the Turkish Employment Agency (İş-Kur), the Information Technologies and Communication Authority, judicial authorities, and other public legal entities. For example, employee personal data may be shared with the Social Security Institution for the payment of employee and employer premiums.

In addition, we may share your personal data:



For the performance of the employment contract, in particular:

- To authorized financial advisor SMMM Ferdi Yetiştiren of SCA for the purpose of executing payroll processes and updating related data. The data is processed in the LUCA accounting program used by SMMM Ferdi Yetiştiren, stored within the application's own data environment.

For fulfilling requirements under the Labor Law, Occupational Health and Safety Law, Social Security Law, relevant legislation, and other laws and regulations, in particular:

- With consultancy firms and private employment agencies we work with to determine and calculate incentives we may benefit from under R&D legislation.
- With our workplace doctor in order to provide treatment and health checks.
- With company auditors to allow them to conduct auditing activities regarding payroll information.

For ensuring security within the Company, in particular:

- With building management to monitor entry and exit for workplace security purposes.

For fulfilling legal obligations, in particular:

- With our lawyers to exercise our right of defense and, provided that it complies with law and procedure, with relevant institutions in the event of court orders or requests for evidence.

For the administration of the Company, execution of business, and implementation of company policies, in particular:

- With group companies we are affiliated with or jointly working with, to ensure internal operations.
- With archiving companies to store personal data for retention periods in order to maintain company storage capacity.
- With service providers for transportation, vehicle supply, business card printing, parking registration, etc.
- With platforms for which your membership requires the transfer of your name-surname information, in the event you register.

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES ABROAD

With your consent, your personal data may be shared with third parties abroad for the purposes of ensuring communication during overseas travel and training, arranging travel, and sending bulk e-mails.

YOUR RIGHTS

Pursuant to Article 11 of the KVKK, by personally applying to us and proving your identity, you have the right to:

- Learn whether the Company processes your personal data, and if it does, request information about it.
- Learn the purpose of processing personal data and whether it is used for its intended purpose.
- Learn whether personal data is transferred domestically or abroad, and to whom it has been transferred.

You also have the right to request the correction of your incorrect or incomplete personal data and to request that recipients to whom the data has been or may have been transferred be informed.

You may request the deletion (erasure, destruction, or anonymization) of your personal data within the framework of the conditions set forth in Article 7 of the KVKK. At the same time, you may request that third parties to whom the data has been or may have been transferred be informed of your request for deletion. However, your request will be evaluated by



us, and the method deemed appropriate will be chosen according to the circumstances of the case. You may always request information from us about why the chosen method was selected.

You may object to the results of your personal data analysis carried out exclusively through an automated system, if these results are contrary to your interests.

If you suffer damage due to unlawful processing of your personal data, you may request compensation for such damage.

Your requests in your application will be finalized free of charge within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost for the Company, the fee specified in the tariff determined by the Personal Data Protection Board in the Communiqué on the Principles and Procedures for the Application to the Data Controller may be charged.

For issues related to the processing of your personal data, you must complete the Data Controller Application Form, which can be downloaded by clicking here, and submit it in writing or via registered electronic mail (KEP) address, secure electronic signature, mobile signature, or by using the electronic mail address previously notified to us and registered in our records. Depending on the nature of your request and your application method, the Company may request additional verifications (such as sending a message to your registered phone, calling you) to determine whether the application belongs to you and thus protect your rights. For example, if you apply via your registered e-mail address, we may contact you using another communication method registered in the Company and request confirmation that the application belongs to you.

CONTACT INFORMATION

SCA CERTIFICATION AND PRIVATE TRAINING SERVICES LTD. CO.

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