

## PROTECTION OF PERSONAL DATA

### CLARIFICATION TEXT

#### 1. PURPOSE AND SCOPE

YDA Havalimanı Yatırım ve İşletme A.Ş (YDA Airport Investment and Operation Inc.) (YDA / Company) respects your privacy and respects your data security. With this awareness, we attach importance to the processing, safe use and preservation of all personal data of the persons who benefit from our products and services related to YDA in accordance with Law No. 6698 on Personal Data Protection (6698 KVKK-PDPL).

YDA Havalimanı Yatırım ve İşletme A.Ş (YDA Airport Investment and Operation Inc.) has prepared this text as Data Supervisor in order to inform and enlighten you about our data collection, processing, transfer, safe storage and destruction practices within the scope of Law No 6698 KVKK (PDPL) and other related legislation.

#### 2. DEFINITIONS

In this Clarification Text about KVKK (PDPL);

**Personal Data:** It refers to any information relating to specific or identifiable natural person. In the justification, whether a person is specific or identifiable is defined as making that person identifiable by associating the existing data in any way with a real person. (Name, Surname, Turkish Identity Number, Passport Number, Address, Phone, System Entry-Exit Times, Areas visited / products and transactions performed, digital data stored in databases or files related to their location, documents in which personal information is kept by HR or other units such as job applications / resumes, order records, birthplace / date, vehicle license plate, E-mail address / IP address, fingerprint, image and voice recordings, all similar data that make the person identifiable)

**Sensitive Personal Data:** Sensitive personal data is the one that may cause discrimination or victimization concerning the relevant person if it is learned. Therefore, they need to be protected more strictly than other personal data. Sensitive personal data may be processed with the explicit consent of the person concerned, or in limited cases as specified in the law. (Race, Ethnicity, Political Thought, Philosophical Belief, Religious, Denomination or other beliefs, Costume and Dress, Association, Foundation or Trade Union Membership, Health, Sexual Life, Criminal Conviction / Property Data, Data on Security Measures, Biometric and Genetic Data)

**Processing of Personal Data:** It means performing all kinds of process on personal data consisting of obtaining, saving, storing, modifying, transferring abroad and sharing with third parties any personal data obtained by automated means or by non-automatic means provided that it is part of any data recording system.

**Law No. 6698 on Protection of Personal Data 'KVKK':** means the Law No. 6698 on Protection of Personal Data, which was published in the Official Gazette on 7 April 2016.

**Board:** means the Personal Data Protection Board.

**Explicit Consent:** means the approval given to a particular subject, which is based on information and free will, without any hesitation, limited to that transaction.

**Anonymization:** It is a fact that personal data cannot be associated with a specific or identifiable real person under any circumstances even by matching with other data.

**Personal Data Owner (Relevant Person):** means the real person whose personal data is processed. For example; Customers, suppliers, visitors, employees and employee candidates.

**Data Processor:** refers to the real or legal person who processes personal data on behalf of the data supervisor on the basis of the authorization given by him.

**Data Supervisor:** It is the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system. It is the person who determines 'why' and 'how' data processing is made in general.

**Contact Person:** It is the person who ensures communication with the organization and liaison with the data owners. The contact person is not the representative of the data supervisor. The contact person is not the person authorized to carry out transactions on behalf of the data supervisor and the person to whom the requests from the institution are notified. (In case of questions and requests from data owners, it is not an evaluation authority but only a contact provider.)

**SHGM:** Directorate General of Civil Aviation

**DHMI:** State Airports Administration

### 3. LIABILITY

**Data Supervisor** : YDA Havalimani Yatırım ve İşletme A.Ş. (YDA Airport Investment and Operation Inc.)

**Contact Person** : Cengiz Tuğrul AYAZ

**Data Processor** : All relevant parties processing data on behalf of YDA

### CONTACT

Title : YDA HAVALİMANI YATIRIM VE İŞLETME A.Ş. (YDA Airport Investment and Operation Inc.)

Mersis no : 0946-0240-2450-0017 (Central Registration System Number)

E-mail address : [info@yda.acro](mailto:info@yda.acro)

KEP Mail : [ydahavalimani@hs01.kep.tr](mailto:ydahavalimani@hs01.kep.tr)

Postal Address : Muğla Dalaman Havalimani İç ve Dış Hatlar Terminal Binaları

48770 Dalaman/MUĞLA TURKEY

### 4. EXECUTION (PRACTICE)

As **YDA Havalimani Yatırım ve İşletme A.Ş.** (YDA Airport Investment and Operation Inc.);

we ensure our employees, customers and employees, potential customers and their employees, suppliers and employees, employee candidates, visitors, passengers, business partners, institutions we cooperate with, and employees and other third related parties / relevant persons that;

we take care of and act with care by holding the title of data supervisor for the collection, processing, transferring, safe storage and destruction of personal data contained by our Company within the frame of the Constitution of the Republic of Turkey, international conventions to which our country is a party, in accordance with the relevant legislation, especially the Law No. 6698 on Protection of Personal Data.

#### **4.1. Purpose of Collecting and Processing Personal Data and Legal Reason**

Your personal data shall be collected and processed in the purpose and scope as described below by our company's units, processes, social media channels, real or legal persons with whom our company cooperates or give authorization to, official institutions and organizations and employees by means of automatic or non-automatic methods with oral, written, electronic or similar means / ways without compromising our quality through communication forms, employee complaint forms, performance follow-up and analysis, social networks, various contracts, mobile applications, e-mails, correspondence, announcements, application forms, terminal passenger transactions, such as documents, records and transactions.

Your personal data shall be processed pursuant to Articles 4, 5 and 6 of KVKK (PDPL) No. 6698 in accordance with the ones as below;

- i. As required by the law and the rule of honesty,
- ii. Limitedly and temperately in relation to the purposes of processing,
- iii. Accurately and up to date,
- iv. With specific, explicit and legitimate purposes,
- v. Within the period required by the relevant legislation or in accordance with the conditions and purpose in which they are processed,

Also; with regard to the issues to which it is connected and with aiming of

- ✓ Within the scope of the services you receive, meeting expectations and demands of your customer, supplier, employee and all related 3rd party, getting to know you better and understanding your requests and needs, responding to your demands and needs faster,
- ✓ Supporting your service and payment preferences associated with you,
- ✓ Improving and diversifying our services and communication, contacting you if you request information,
- ✓ Managing the process of Lost Property,
- ✓ In order for our business units to carry out the necessary works / processes that can help us provide you personalized content and offers,
- ✓ Planning and execution of corporate communication activities,
- ✓ Meeting the purchase demands, determining and approving the terms of the contract,
- ✓ Planning and execution of finance, accounting activities,
- ✓ Planning and execution of legal activities,
- ✓ Planning, controlling and execution of information security processes, creation and management of information technology infrastructure,
- ✓ Performing external supplier service processes in Terminal areas,
- ✓ Performing flight and terminal transactions of our customers and passengers,
- ✓ When you visit our terminal, ensuring safe passing through the entrance and exit areas,

- ✓ When you visit our terminal, measuring your satisfaction about our services with regard to 'customer satisfaction and complaints', eliminating complaints and making controls to prevent recurrence,
- ✓ Communication with us through our website,
- ✓ Planning and execution of our services within the scope of sales and marketing processes,
- ✓ Planning and execution of the activities performed to please you during your stay in our Terminal,
- ✓ Ensuring the necessary quality follow-up of our services, establishing quality records and evidence,
- ✓ Fulfilling our other obligations regarding the determination and implementation of legal, commercial, financial, administrative operations and commercial and business strategies of our company in order to carry out our quality and standard audits or to ensure the fulfillment of legal and commercial obligations with persons in business relationship with our company through reporting provided by the legislation,
- ✓ Making evaluation during the application process of Employee Candidate, getting information from your references,
- ✓ Meeting the requirements of 5651 Log Law within the scope of using our guest internet network,
- ✓ Announcement of our fairs, events, sponsorship and promotion organizations and sharing them for promotion and advertising after the events,
- ✓ Evaluation in case you apply for a job within the scope of ensuring the execution of our company's human resources policies,
- ✓ Safe and healthy execution of our Terminal Parking service,
- ✓ Meeting the demands in accordance with the regulations declared by SHGM (DGCA) and DHMİ (SAA) and all related institutions,
- ✓ In accordance with the Log Law No. 5651, having usage information and periods in the input and output logs related to internet service,
- ✓ Monitoring movement traces of the activities carried out during the period you are active in the system within the scope of the System Security of the Company,
- ✓ Use of our services on our website,
- ✓ Requesting the business partners to which the Company is affiliated within the scope of strategic planning of the top management,
- ✓ Recording your electronic records with a software in order to be able to follow them on a system-based basis within the human resources, maintaining this process with the support of outsourced servers and providing them from homeland within the scope of the archive,
- ✓ Ensuring the execution of our company's human resources policies and fulfilling our legal and legal obligations,
- ✓ Increasing the performance level and employee satisfaction of our employees within the scope of our human resources policy as well as the obligations stipulated in the labor law, labor and social security legislation and other legislation in force, ensuring occupational safety and peace of mind at work,
- ✓ Realizing the legal, technical and commercial obligations of the persons involved in the business relationship with the follow-up of the contract processes and / or legal demands

of our employees with the reporting provided by the legislation, and ensuring the safety of the work,

- ✓ In order to provide entry and exit from the office, obtaining the fingerprint registration (as long as it is applied) by converting the fingerprint record into numerical codes by means of making comparisons and obtaining input and output data in card passes,
- ✓ Informing relatives of our employees in emergency situations,
- ✓ Evaluating your ideas, opinions and suggestions that we value as our employees,
- ✓ Performing the service processes of the data / information / expressions declared by the Human Resources in all records related to the 'Employee Satisfaction', in which employees voluntarily participate,
- ✓ Making salary payments,
- ✓ Performing activities within the scope of social activities,

the below mentioned ones are collected, processed and recorded in our systems and kept safe for the above purposes.

- Your Name and Surname,
- Your personal information, resume and reference information that will meet the working and security requirements within the scope of the Job Application Form,
- Your e-mail address, postal address, telephone numbers, other contact addresses that allow us to send you information,
- Photocopies of identity, passport, etc. within the scope of related processes,
- Name, surname and contact information of your relatives to whom the emergency cases are notified,
- Your blood type information for emergency situations (if necessary, by informing you),
- Your Employee Performance Evaluations,
- Your body measurements within the scope of social activities and occupational health safety,
- Your association and club membership information (not requested at the time of job application and as long as it is provided by you),
- IP addresses used in company computers, tablets and phones, movement traces / logs within the system,
- Your personal and private personal data on computers, tablets and phones if you do not delete after you return the embezzlement (will be deleted by us if it is found not to be deleted),
- Your personal data in accordance with the demands of Log Law No. 5651, SHGM (DGCA), DHMİ (SAA) and all related official institutions and organizations,
- Account / Payment information,
- Your personal data under the contract to determine the terms of service purchased,
- Entry and exit times,
- For security reasons, your camera images,

- Your audiovisual images within the scope of Terminal Parking,
- Your requested service and expectations information,
- History of your official transactions,
- Images taken under the management of our fairs, events, sponsorship and promotion organizations,
- Your self-collected cookie information, (You can review our Cookie Policy on our websites.)

Our web sites and social networks where we provide services and collect your data are submitted as below for your information.

#### **Our Web Site and Social Media Accounts:**

Our Web Site : <https://www.yda.aero/anasayfa>

Pinterest	<a href="https://tr.pinterest.com/ydadalamanairport/">https://tr.pinterest.com/ydadalamanairport/</a>
Instagram	<a href="https://www.instagram.com/dalamanairport/">https://www.instagram.com/dalamanairport/</a>
Facebook	<a href="https://www.facebook.com/dlairport/">https://www.facebook.com/dlairport/</a>
Facebook	<a href="https://www.facebook.com/DLM.LTBS/">https://www.facebook.com/DLM.LTBS/</a>
Twitter	<a href="https://twitter.com/dalaman_airport">https://twitter.com/dalaman_airport</a>
Youtube	<a href="https://www.youtube.com/channel/UCQSue_Fmofw_KuRX3FS9iEQ">https://www.youtube.com/channel/UCQSue_Fmofw_KuRX3FS9iEQ</a>
Linkedin	<a href="https://www.linkedin.com/company/ydaairport/">https://www.linkedin.com/company/ydaairport/</a>
Linkedin	<a href="https://www.linkedin.com/company/dalamanairport/">https://www.linkedin.com/company/dalamanairport/</a>

There is no obligation for your personal data you have shared with us from these sites and we take care to get enough information to meet your needs and demands.

#### **4.2 Transferring Your Personal Data**

Your personal data may be shared with the Group companies in accordance with the KVKK (PDPL) and the legislation in force for the purposes listed above, including, but not limited to; shareholders, business partners, affiliates, suppliers, business contacts, performance aids and subcontractors, or they may be transferred to homeland or abroad for the purpose of the service we provide, or where required by the legislation of regulatory supervisory authorities and official authorities.

#### **4.3 Storing and Deleting Data**

Our Company stores the personal data it processes during the periods specified in the legislation, company procedures and policies. If there is no time limit in the legislation, the personal data is stored for the period required to be processed in accordance with the practices and commercial practices of our company in accordance with the services provided by our company while processing that data and after this period only during the periods required for implementation in order to provide evidence for possible legal disputes. (Commercial data is kept for 5 years and personal information is kept for 10 years) After the expiry of the specified periods, the personal data are deleted, destroyed or made anonymized if necessary by means of 'Safe Disposal Instruction' and the methods defined in the related company procedures and policies.

#### 4.4 Your Rights as a Personal Data Owner

Within the framework of Article 11 of the KVKK (PDPL), you have the right of;

- i. Learning whether your personal data is processed or not,
- ii. Requesting information if your personal data has been processed,
- iii. Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- iv. Knowing the third parties to whom your personal data are transferred in homeland or abroad,
- v. Requesting that your personal data be corrected if it is incomplete or incorrectly processed,
- vi. Requesting the deletion or destruction of your personal data in accordance with the conditions stipulated in the KVKK (PDPL) legislation,
- vii. When you request correction of missing or incorrect data and deletion or destruction of your personal data,
- viii. Requesting that this be notified to the third parties to whom your personal data have been transferred,
- ix. Objecting to the occurrence of a result against you by analyzing the processed data exclusively through automated systems,
- x. Requesting that the damage be remedied if you suffer any damage due to unlawful processing of personal data,

In order to use your rights mentioned above, you must submit your written request with the necessary information that will identify you and your explanations about your right to use by sending 'Application Form for Data Owners to Use Their Rights' as wet signed to 'YDA Airport Investment and Operation Inc.' at the address of Muğla Dalaman Airport Domestic and International Terminal Buildings 48770 Dalaman / MUĞLA' or by sending through your personal e-mail address to our registered e-mail address 'ydahavalimani@hs01.kep.tr' or sending to info@yda.aero by using the e-mail addresses that have been previously reported to YDA and registered in the system of the data supervisor.

Applications should be submitted in Turkish or English.

In the application that contains your explanations of the right that you have as a personal data owner and that you will make and request to use in order to exercise your rights mentioned above;

- ✓ The subject / matter you request should be clear and understandable,
- ✓ In case of written application, the personal data holder's wet signed consent is required,
- ✓ The subject you are requesting should be relevant to yourself,
- ✓ If you are acting on behalf of someone else, you must be specifically authorized and your authorization should be documented,
- ✓ The application should include the identity and address information (address of the place of residence or the business subject to the notification, e-mail address of the notification, telephone or fax number if applicable),

- ✓ During application, the applicant is required to bring the documents reveal his/her identity. (T.R. identification number for citizens of the Republic of Turkey, for the foreigners nationality, passport number / ID number, etc.)

Your applications submitted to us shall be replied within thirty days from the date of receipt of your request according to the nature of the request, in accordance with paragraph 2 of Article 13 of the KVK (PDL) Law. Our responses will be sent to you in writing or electronically in accordance with the provisions of Article 13 of the relevant KVK (PDL) Law. Personal data holder may complain to the Board within thirty days from the date of his/her learning our company's reply and in sixty days from the date of application with the approval of the person, in case of rejection of the application, inadequate response of the application or failure to respond to the application on time in accordance with Article 14 of KVKK (PDPL) No 6698.

The Company reserves the right to charge you a fee according to the tariff to be determined by the Personal Data Protection Board in case of any additional costs occur under Article 13 of the Law.

6698 Pursuant to Article 28/2 of the KVKK (PDPL), personal data holders cannot assert any of the above-mentioned rights, except for the right to claim damages stated as below:

- ✓ Personal data processing is necessary for crime prevention or crime investigation,
- ✓ Processing of personal data publicized by the personal data owner,
- ✓ Personal data processing is required for the conduct of supervisory or regulatory duties by the public institutions and organizations which are in charge of the authority given by the law and the professional organizations which are qualified as public institutions and required for disciplinary investigation or prosecution,
- ✓ Personal data processing is necessary to protect the economic and financial interests of the state in relation to budget, tax and financial issues.

#### **4.5 Cases where the YDA may process your Personal Data without your explicit consent under KVKK (PDPL)**

Pursuant to Article 5 of the KVKK (PDPL), YDA may process your personal data specified above and obtained in accordance with the law without your explicit consent:

- Where expressly provided by law,
- If you are unable to disclose your consent as the owner of the data due to the actual impossibility, or where your consent is not legally valid, your personal data must be processed in order to protect yourself or someone else's life or physical integrity,
- YDA and its related companies are required to process the personal data of the parties to the contract, provided that it is directly related to the establishment or execution of a contract concluded with other natural and / or legal persons referred to in Article 3,
- There must be a mandatory situation for the YDA to fulfill a legal obligation,
- Where your personal data should be publicized by yourself,
- Where data processing is mandatory for the establishment, use or protection of a right,



- Where data processing for the legitimate interests of YDA is mandatory without prejudice to your fundamental rights and freedoms.

#### **4.6 The Rights of the Personal Data Owner in the scope of the General Data Protection Regulation (GDPR) of the European Union**

- ✓ The right to be informed about transparent information on the use of the rights of the data owner,
- ✓ When personal data for the data owner is collected from the data owner, the right to inform the data owner about identity and contact information of the controller and, where appropriate, the controller's contact information, where appropriate, the contact details of the data protection officer and, where appropriate, the intended purpose of the personal data, as well as the legal basis of the processing activities,
- ✓ The right to inform the data owner if the information and personal data specified in Article 14 of the GDPR are not received from the data owner,
- ✓ The right of the data owner to confirm whether the personal data related to him or her has been processed or not and the right to request the following information in case of any activity by accessing to personal data,
- ✓ The right of the data owner to request the controller to correct the incorrect personal data about them without undue delay,
- ✓ The right of the data owner to complete missing personal data, including by means of an additional declaration, by paying regard to processing purposes,
- ✓ The right of the data owner to request the controller to delete the personal data concerning him / her without any delay,
- ✓ The right of the data owner to request the controller to restrict the processing activity,
- ✓ The right to receive the personal data that the data owner has provided to a controller in relation to itself, in a structured, widely used, machine-readable format,
- ✓ The right to transmit this data to another controller without any hindrance by the controller from whom the personal data is provided,
- ✓ The right of the data owner to object to the processing of personal data at any time,
- ✓ The right to not be subject to a decision based solely on automated processing, including profiling, which has legal consequences for the data owner itself or similarly that has a significant impact for data owner.

The relevant legislation in force during the process of collection, processing, transferring, safe storage and destruction of this personal data in the context of this Clarification Text shall prevail primarily.

In the event of any inconsistency between the Legislation in force and the Clarification Text, the data supervisor accepts that the Legislation in force shall be applied.

Clarification Text about KVKK (PDPL) entered into force on 21.06.2018 and was revised and reissued on 18.12.2019. In the event of renewal of the entire Clarification Text or its certain articles, the publication date shall be updated and announced again.



The Clarification Text is published on the <https://www.yda.aero> website and server in the common area under Integrated Management Systems and made available to our employees and related third parties. In order to comply with the changing conditions and legislation, changes and updates can be made in the Clarification Text and it can be submitted to you by informing you on the relevant website and public folders on our server.