

EMPLOYEE

CLARIFICATION POLICY REGARDING PERSONAL DATA PROTECTION

We, as Ağaoğlu Eltes Gold Residence Site Yönetimi, would like to inform you in accordance with the 10th Article of Personal Data Protection Law numbered 6698 (“PDPL”) as our employees (“Employee”) working at Eltes Gold (“Workplace”), about our identity, purpose of processing your data, to whom and why we transfer your data, our legal bases, our methods of processing and your rights related to the personal data collected accordingly to your employment relationship with us.

- **Data Controller:** Ağaoğlu Eltes Gold Residence Site Yönetimi residing at Madenler Mahallesi Şehit Ünal Kalafat Caddesi No:32 Ümraniye/İstanbul

Your personal data are;

- being in **conformity with the law and good faith**,
- being **accurate and if necessary - up to date**,
- being **processed for specified, explicit and legitimate purposes**,
- being **relevant, limited and proportionate to the purposes** for which data are processed,
- being **stored only for the time designated by relevant legislation or necessitated by the purpose** for which data are collected.

Category of Personal Data	Type of Personal Data	Data Subject	Purpose of Processing	Legal Basis of Processing	Data Collection Method	Data Transfer
Identifying Data	Name Surname	Employee	Identifying the Employee in order to keep the necessary records for his/her acceptance and admission and to carry out financial, accounting and legal processes throughout his/her employment relationship	Processing of Name Surname data being necessary in order us to conclude and fulfill labour agreement with the Employee	Through employment document, semi-automatically	It will be transferred to competent authorities in case of dispute, law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Name of Employee’s Mother and Father*	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of Name of Employee’s Mother and Father data being mandatory in order us to fulfill our legal obligation of ‘reporting the insured Employee to Social Security Institution’ pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities

Identifying Data	Name and Surname of Employee's Spouse*	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'filling out a family status notification form' within the scope of calculating the minimum living allowance pursuant to the the Article 32 of the Income Tax Law No. 193	Through family status notification form, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Name and Surname of Employee's Child*	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'filling out a family status notification form' within the scope of calculating the minimum living allowance pursuant to the the Article 32 of the Income Tax Law No. 193	Through family status notification form, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	T.R. Identity Number	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of T.R. Identity Number data being necessary in order us to conclude labour agreement with the Employee	Through employment document, semi-automatically	It will be transferred to competent authorities in case of dispute, law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Blue Card Number	Employee Owning a Blue Card	Fulfilling our obligations arising from labour agreement and legislation	Processing of Blue Card Number data being necessary in order us to conclude labour agreement with the Employee	Through employment document, semi-automatically	It will be transferred to competent authorities in case of dispute, law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Passport Number	Foreign Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of Passport Number data being necessary in order us to conclude labour agreement with the Employee	Through employment document, semi-automatically	It will be transferred to competent authorities in case of dispute, law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities

Identifying Data	T.R. Identity Number of Employee's Child*	Employee's Child	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'filling out a family status notification form' within the scope of calculating the minimum living allowance pursuant to the the Article 32 of the Income Tax Law No. 193	Through family status notification form, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Date of Birth	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'reporting the insured Employee to Social Security Institution' pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Date of Birth of Employee's Child*	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'filling out a family status notification form' within the scope of calculating the minimum living allowance pursuant to the the Article 32 of the Income Tax Law No. 193	Through family status notification form, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Place of Birth	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'reporting the insured Employee to Social Security Institution' pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Place of Registry	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'reporting the insured Employee to Social Security Institution' pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ağaoğlu & group companies in order to collaborate in commercial activities

Identifying Data	Nationality	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of Nationality data being mandatory in order us to fulfill our legal obligation of 'including Turkish Employee in individual pension plan' pursuant to the additional Article 2 of the Individual Pension Savings and Investment System Law No. 4632	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Identifying Data	Marital Status	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'filling out a family status notification form' within the scope of calculating the minimum living allowance pursuant to the the Article 32 of the Income Tax Law No. 193	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Contact Data	Address	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of Address data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Employee to law enforcement agencies' pursuant to the Identity Reporting Law numbered 1774	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Contact Data	E-mail Address	Employee	Carrying out communication activities	Processing of E-mail Address data with the purpose of carrying out communication activities with the Employee throughout the employment, being mandatory for our legitimate interest	Through employment document, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Contact Data	Phone Number	Employee	Carrying out communication activities	Processing of Phone Number data with the purpose of carrying out communication activities with the Employee throughout the employment, being mandatory for our legitimate interest	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities

Other	Information on Whether the Employee's Child is Biological, Stepchild, Adopted, Provided with Alimony, and Grandchild Who Lost His Parent	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'filling out a family status notification form' within the scope of calculating the minimum living allowance pursuant to the the Article 32 of the Income Tax Law No. 193	Through family status notification form, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Occupational Experience	Job	Employee	Determining the existence of authorisation to approve certain reports and forms according to the Employee's job description	Processing of this data in order us to determine the authority to approve certain permit papers, reports according to Employee's seniority, being mandatory for the establishment of right	Through personnel information, semi-automatically	It will be transferred to Aġaoġlu & group companies in order to collaborate in commercial activities
Occupational Experience	Employee's Previous Workplace	Employee	Identifying Employee's previous job description	Having legitimate interest in defining the new job and determining the responsibilities according to Employee's previous job description and processing of this data being mandatory for our legitimate interest	Through service scheme document, non-automatically	It will be transferred to Aġaoġlu & group companies in order to collaborate in commercial activities
Employee's Job in His/Her Previous Workplace						
Employee's Field of Operation in His/Her Previous Workplace						
Physical Location Safety	Workplace Entry-Exit Time and Date	Employee	Calculating overtime wage	Processing of this data being mandatory in order us to fulfill our legal obligation of 'paying overtime wage' pursuant to the the Labour Law No. 4857	Through workplace entry-exit system, automatically	It will be transferred to competent authorities in case of dispute, Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities

Personnel File	Disciplinary Report	Employee	Carrying out and auditing human resources activities by ensuring business continuity	Processing of this data being mandatory in order us to fulfill our legal obligation of 'drafting a Disciplinary Report in the light of the precedents of Supreme Court on rightfully termination of labour agreement' pursuant to the the Labour Law No. 4857	Through disciplinary report, semi-automatically	It will be transferred to competent authorities in case of dispute, Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
	Date of Employment and Termination of Employment Agreement	Employee	Sending notices to SSI (Social Security Institution) and fulfilling our obligations arising from labour agreement and legislation	Processing of this data being mandatory in order us to fulfill our legal obligation of 'reporting the insured Employee to Social Security Institution' pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through service scheme document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Personnel File	Reason for Termination of Employment Agreement	Employee	Sending notices to SSI (Social Security Institution) and fulfilling our obligations arising from labour agreement and legislation	Processing of related data being mandatory in order us to fulfill our legal obligation of 'reporting the insured Employee to Social Security Institution' pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through termination documents, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
Occupational Experience	Certificate, Trainings and Diploma Information	Employee	Making Data Subject's work-suitability assessment for planning human resources processes and conducting assignment processes	Processing of related data being mandatory in order us to fulfill our legal obligation of 'issuing a personnel file' pursuant to the the Labour Law No. 4857	Through employment document, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Aġaoġlu & group companies in order to collaborate in commercial activities
	Educational Background					
Other	Military Service Information	Employee	Fulfilling our legal obligations	Processing of this data being mandatory in order us to fulfill our legal obligation of 'not employing a deserter' pursuant to the Article 75 of the Military Criminal Code No. 1632	Through employment document, semi-automatically	It will be transferred to competent authorities in case of dispute, and Aġaoġlu & group companies in order to collaborate in commercial activities

Other	Gender	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of Gender data being mandatory in order us to fulfill our legal obligation of 'reporting the insured Employee to Social Security Institution' pursuant to the Social Insurance and General Health Insurance Law No. 5510	Through employment document, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Ađaođlu & group companies in order to collaborate in commercial activities
Other	Signature	Employee	Determining Employee's declaration of intent in legal transactions made within the scope of his/her labour agreement	Processing of Signature data in order us to determine Employee's declaration of intent, being mandatory for the protection of the right	Through legal affairs, semi-automatically	It will be transferred to Social Security Institution in order to fulfill legal obligations, and Ađaođlu & group companies in order to collaborate in commercial activities
Financial Information	Bank Account Information	Employee	Paying salaries, advances / expenses and making other payments to the Employee	Processing of this data being necessary in order us to fulfill labour agreement, concluded with the Employee	Through employment document, semi-automatically	It will be transferred to the bank in order to make the payments and Ađaođlu & group companies in order to collaborate in commercial activities
Visual and Audial Recordings	Photograph	Employee	Fulfilling our obligations arising from labour agreement and legislation	Processing of Photograph data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Employee to law enforcement agencies' pursuant to the Identity Reporting Law numbered 1774	Through employment document, semi-automatically	It will be transferred to law enforcement agencies and Social Security Institution in order to fulfill legal obligations, and Ađaođlu & group companies in order to collaborate in commercial activities
Other	Body Size	Blue-Collar Employee	Providing Employee with proper work clothes according to his/her body size, height and weight	Processing of related data with the purpose of providing suitable work clothes for Employee, being mandatory for our legitimate interest	Through Employee's notification, semi-automatically	It will be transferred to Ađaođlu & group companies in order to collaborate in commercial activities
Other	Height					
Other	Weight					
Other	License Plate	Employee	Fulfilling our legal obligations	Processing of License Plate data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Employee to law enforcement agencies' pursuant to the Identity Reporting Law numbered 1774	Through Employee's notification, semi-automatically	It will be transferred to law enforcement agencies, and Ađaođlu & group companies in order to collaborate in commercial activities

Criminal Convictions and Security Measures	Former Conviction Status	Employee	Carrying out the activities in the workplace in accordance with the nature of the work and the legislation	Explicit and clarified consent of the Data Subject	Through criminal record, semi-automatically	It will be transferred to Social Security Institution in case of an explicit and clarified consent of the Data Subject
Health Information	State of Disability	Employee	Carrying out occupational health and safety activities	Explicit and clarified consent of the Data Subject	Through employment document, semi-automatically	It will be transferred to Social Security Institution in case of an explicit and clarified consent of the Data Subject
Health Information	Blood Type	Employee	Ensuring rapid response in a possible emergency	Explicit and clarified consent of the Data Subject	Through employment document, semi-automatically	It will be transferred to Aġaoġlu & group companies in order to collaborate in case of an explicit and clarified consent of the Data Subject
Health Information	Equipment and Prosthetic Information	Employee	Carrying out occupational health and safety activities	Explicit and clarified consent of the Data Subject	Through employment document, semi-automatically	It will be transferred to Aġaoġlu & group companies in order to collaborate in case of an explicit and clarified consent of the Data Subject

*With regard to Name Surname, T.R. Identity Number and Date of Birth data of Employee's Mother and Father, Spouse and Children that are transferred to us through photocopy of the identity card and the family status notification form, Employee is a Data Controller and obliged to inform above-mentioned data subjects in accordance with the 10th Article of PDPL. About the data transferred to us, we have an obligation to inform the data subjects in a reasonable period of time after collecting personal data in accordance with the 10th Article of PDPL and 6th Article (a) of Communique On Principles And Procedures To Be Followed In Fulfillment Of The Obligation To Inform.

You have the right to learn

- whether or not your personal data is being processed,
- the purpose of the processing and
- to whom your personal data is transferred domestically and internationally.

You have the right to request

- that your personal data should be processed in accordance with the purpose,
- rectification of personal data if processed incompletely or inaccurately,
- destruction upon disappearance of reasons which require the process,
- notification of the rectification or destruction to the third parties to whom personal data has been transferred and
- compensation for the damage arising from the unlawful processing.

You have the right to object

- to the processing, exclusively by automatic means of your personal data, which leads to an unfavorable consequence for you.

You may send us your request on using your above-mentioned rights, together with documents providing your identity and the scope of your request through below-mentioned manners:

- Sending an electronically signed or unsigned e-mail to **eltes.gold@agaoglu.com.tr**,
- Sending an e-mail to **eltesgold@hs03.kep.tr** Registered Electronic Mail (REM) address from your REM account with a secure electronic signature,
- Delivering by hand, by notary or by certified mail to **Madenler Mahallesi Şehit Ünal Kalafat Caddesi No:32 Ümraniye/İstanbul.**

We undertake to respond your request as soon as possible but not more than 30 (thirty) days, and without any charge, as long as there is no transaction cost.