

**PERSONAL DATA PROCESSING AND PROTECTION POLICY
(EMPLOYEES)**

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1. INTRODUCTION

1.1 Purpose and Scope of the Policy

Law No. 6698 on the Protection of Personal Data (hereinafter referred to as "Law" and/or "KVKK") entered into force on April 7, 2016; This QVV Engineering UK Limited. Policy on the Processing and Protection of Personal Data of Employees / Candidate Employees / Interns (hereinafter referred to as "Policy" and / or "Employee Policy") aims to ensure the compliance of QVV Engineering UK Limited. (hereinafter referred to as "Company") with the Law and to determine the principles to be followed in fulfilling the obligations regarding the protection and processing of personal data while processing the personal data of the Company employees.

I. The Personal Data Processing and Protection Policy determines the terms of processing personal data and sets out the main principles adopted by the Company in the processing of employee personal data. Within this framework, it covers all personal data processing activities carried out by the Company within the scope of the Law, all employees/candidate employees/interns whose personal data are processed by the Company and all personal data processed by the Company.

Definitions of the terms used in this policy can be found in Annex 1.

1.2 Enforcement and Amendment

This Policy has been published on <https://www.qvvengineering.co/> for the information of the relevant parties. The Company reserves the right to amend the Policy in accordance with legal regulations. In case of any conflict between the provisions of the Law and the Employee Policy, the provisions of the legislation in force shall apply.

2. DATA SUBJECTS, DATA PROCESSING PURPOSES AND DATA CATEGORIES COVERED BY THE POLICY

2.1 Data Subjects Covered by the Policy

The data subjects covered by the Policy are all Company employees/candidate employees/interns whose personal data are being processed by the Company.

2.2 Purposes of Processing Personal Data

2.2.1 General Purposes Regarding the Processing of Personal Data of Employees/Candidates/Interns

Your personal data and sensitive personal data may be processed by the Company for the following purposes in accordance with the personal data processing conditions:



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MAIN PURPOSES	SUBPURPOSES
Carrying out the necessary work by our business units to ensure that the relevant persons benefit from the services offered by the Company and carrying out the relevant business processes	<ol style="list-style-type: none">1. Follow-up of Requests and Complaints2. Follow-up of Contract Processes and Legal Requests
Ensuring the legal, technical and commercial-business security of the Company and related persons who are in business relations with the Company	<ol style="list-style-type: none">1. Planning and Execution of Operational Activities Required to Ensure that Company Activities are Conducted in Accordance with Company Procedures and Relevant Legislation2. Planning and Execution of Occupational Health and Safety Processes3. Ensuring that Data is Accurate and Up-to-Date4. Providing Legislative Information to Authorized Institutions5. Ensuring the Security of the Company, Campus and Facilities6. Creating and Tracking Visitor Records7. Ensuring the Security of Company Operations8. Ensuring the Security of Company Fixtures and Resources9. Follow-up of Legal Affairs10. Planning and Execution of Company Audit Activities
Planning and execution of the Company's human resources policies and processes	<ol style="list-style-type: none">1. Fulfillment of Contractual and Regulatory Obligations for Employees2. Employees / Candidate Employees / Interns3. Monitoring and Supervision of Business Activities4. Planning Human Resources Processes5. Planning and Execution of Internal Appointment-Promotion and Termination Processes6. Planning and Execution of Employees'/ Candidate Employees'/ Interns' Authorizations to Access Information7. Planning and Execution of Corporate Communication for Employees/Candidate Employees/Interns and Corporate Social Responsibility and Non-Governmental Organizations Activities in which Employees Participate8. Planning and Execution of Talent-Career Development Activities9. Planning and Monitoring Performance Evaluation Processes10. Planning and Execution of Benefits and Perks for Employees/Candidates/Interns11. Planning and Execution of Employee Exit Procedures

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	12. Planning and Execution of Processes for Receiving and Evaluating Employees' Suggestions for Improvement of Company Processes 13. Wage Management 14. Planning and Execution of Employee/Candidate/Intern Satisfaction and Loyalty Processes
Carrying out the necessary work by our relevant business units for the realization of the activities carried out by the Company and carrying out the related business processes	1. Planning and Execution of Business Activities 2. Planning and Execution of Corporate Communication Activities 3. Follow-up of Finance and Accounting Affairs 4. Planning and Execution of Business Continuity Ensuring Activities 5. Event Management 6. Planning, Auditing and Execution of Information Security Processes 7. Establishment and Management of Information Technologies Infrastructure 8. Corporate Governance Planning and Execution of Activities 9. Planning, Supporting and Execution of Research and Development Activities
Planning and execution of the Company's operational, commercial and business strategies	1. Planning and Execution of External Training Activities 2. Management of Relations with Business Partners and Suppliers 3. Execution of Strategic Planning Activities 4. Planning and Execution of Distance Education Center Activities
Planning and execution of the activities necessary for the presentation, recommendation and promotion of the Company's programs and services to the relevant persons	1. Planning and Execution of Company Programs and Services Planning and Execution of Processes for Building and Increasing Commitment to the Company 2. Planning and Execution of Company Satisfaction Activities 3. Planning and Execution of Marketing Processes of Company Programs and Services

2.2.2 Activities Conducted Regarding the Processing of Personal Data of Employees

Information on the personal data processing activities carried out by the Company within the framework of the business relationship established with its employees is provided below.

- ***Within the framework of communication, e-mail and internet traffic monitoring activities,*** data on telephone conversations (not the content of the conversation, only the number and the duration of the conversation), all data such as e-mail content and the date of sending, and all internet traffic information regarding the internet access provided in the Company's facilities and premises can be monitored by the Company and processed when necessary due to Law No. 5651 (Law on Regulation of Publications Made on the Internet and Combating Crimes Committed through These Publications). It is forbidden to use the communication, e-mail and internet services allocated to employees by the Company for private purposes other than work.



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- **Personal data of employees may be processed within the framework of disciplinary and anti-fraud activities.** Various employee personal data may be processed through disciplinary investigations initiated to reveal irregular transactions, as well as all kinds of data processing activities such as comparison regarding all data that can be obtained from within or outside the Company.
- **Some parts of the Company premises can be monitored by security cameras** and the images can be processed for the purposes specified in this Employee Policy.
- **The computers allocated by the Company** can be monitored and your personal data in electronic devices can be processed. It is forbidden to use the electronic devices on which personal data are processed for private purposes outside of work and to store private personal data in these devices outside of work.
- **The processing of personal data for the purpose of planning the fringe benefits and rights of employees** may be in question, for example, for the provision of health insurance to the employee. If it is possible to transfer data to third parties within the scope of planning the establishment of fringe benefits and rights, care is taken to transfer limited to the purpose. If the transferred data is personal data of special nature, additional measures are taken by the Company.
- **Employees' health data**, is processed in the narrowest possible scope. As a rule, access to health data can only be carried out by authorized employees if necessary. In cases where health data must be processed, information is provided to ensure that the persons authorized to carry out this processing understand the sensitivity of this data and take the necessary measures.
- **Administrative management, monitoring and control of Company vehicles**, Vehicles used by Company officials are monitored by the Company during working hours for security purposes and to ensure and monitor compliance with traffic rules.

2.3 Categories of Personal Data

Within the scope of employee personal data processing activities carried out by the Company; It processes personal data categorized below based on one or more of the personal data processing conditions specified in Articles 5 and 6 of the Law.


PERSONAL DATA CATEGORIZATION	DESCRIPTION
Identity Information	All information about the identity of the person in documents such as driver's license, identity card, residence card, passport, lawyer ID, marriage certificate



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Contact Information	Information for contacting the data subject such as phone number, address, e-mail
Family Members and Relatives	Information about the family members and relatives of the personal data subject, which is processed in relation to the products and services we offer or to protect the legal interests of the Company and the data subject
Physical Space Security Information	Personal data related to records and documents such as camera recordings, fingerprint records taken at the entrance to the physical space, during the stay in the physical space
Transaction Security Information	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the personal data subject
Personal Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the personal data subject
Employee Transaction Information	Personal data processed regarding all kinds of business-related transactions carried out by our employees or natural persons who are in a working relationship with our Company
Employee Performance and Career Development Information	Personal data processed for the purpose of measuring the performance of our employees or real persons in a working relationship with our Company and planning and executing their career development within the scope of our Company's human resources policy
Fringe Benefits and Perks Information	Personal data processed for the planning of the fringe benefits and perks that we offer and will offer to our employees or other real persons who are in a working relationship with our Company, determining the objective criteria for entitlement to them and monitoring the entitlement to them
Legal Procedure and Compliance Knowledge	Personal data processed within the scope of determination and follow-up of our legal receivables and rights and performance of our debts and compliance with our legal obligations and our Company's policies
Audit and Inspection Knowledge	Personal data processed within the scope of our Company's legal obligations and compliance with Company policies
Sensitive Personal Data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Request/Complaint Management Information	Personal data regarding the receipt and evaluation of any request or complaint addressed to our Company
Reputation Management Knowledge	Information about the information collected for the purpose of protecting our Company's commercial reputation and the evaluation reports and actions taken in this regard

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<p style="text-align: center;">Incident Management Knowledge</p>	<p>Personal data processed in order to take necessary legal, technical and administrative measures against the events that develop in order to protect the commercial rights and interests of our company and the rights and interests of our students</p>
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3. PRINCIPLES AND CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

3.1. Principles Regarding the Processing of Personal Data

Your personal data is processed by the Company in accordance with the personal data processing principles set out in Article 4 of the Law. These principles must be complied with for each personal data processing activity:

- **Processing of personal data in accordance with the law and good faith;** The Company acts in accordance with the laws, secondary regulations and general principles of law in the processing of your personal data; It attaches importance to processing personal data limited to the purpose of processing and taking into account the reasonable expectations of data subjects.
- **Accuracy and timeliness of personal data;** The Company pays attention to whether your personal data processed by the Company is up to date and to carry out the relevant checks. In this context, data subjects are given the right to request correction or deletion of their inaccurate and outdated data.
- **Processing of personal data for specific, explicit and legitimate purposes;** The Company determines the purposes of data processing before each personal data processing activity and ensures that these purposes are not unlawful.
- **Personal data being relevant, limited and proportionate to the purpose for which it is processed;** Data processing activity by the Company is limited to the personal data required to fulfill the purpose of collection and necessary steps are taken to ensure that personal data not related to this purpose are not processed.
- **Retention of personal data for the period required by the legislation or processing purposes;** Personal data are deleted, destroyed or anonymized by the Company after the purpose of processing personal data disappears or upon expiration of the period stipulated in the legislation.

3.2. Conditions Regarding the Processing of Personal Data

Your personal data is processed by the Company in the presence of at least one of the personal data processing conditions specified in Article 5 of the Law. Explanations regarding these conditions are given below:



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- ***In cases where the personal data owner has explicit consent*** and other data processing conditions do not exist, the personal data of the data owner can be processed by the Company in accordance with the general principles under title 3.1. If the data owner gives consent with his/her free will, with sufficient information about the personal data processing activity, in a manner that leaves no room for hesitation and limited to that transaction.
- ***Personal data may be processed by the Company without the explicit consent of the data subject if the personal data processing activity is explicitly stipulated in the laws.*** In this case, the Company will process personal data within the framework of the relevant legal regulation.
- ***In the event that the explicit consent of the data subject cannot be obtained due to actual impossibility and personal data processing is mandatory,*** personal data belonging to the data subject who is unable to disclose his/her consent or whose consent cannot be validated by the Company will be processed in the event that personal data processing is mandatory to protect the life or physical integrity of the data subject or a third person.
- ***If the personal data processing activity is directly related to the establishment or performance of a contract,*** personal data processing activity will be carried out if it is necessary to process personal data belonging to the parties of the contract established or already signed between the data subject and the Company.
- ***In the event that it is mandatory to carry out personal data processing activities in order to fulfill the legal obligation of the data controller,*** the Company processes personal data in order to fulfill its legal obligations stipulated under the applicable legislation.
- ***If the data owner has made his/her personal data public,*** personal data that has been disclosed to the public in any way by the data owner and made publicly available to everyone as a result of publicization may be processed by the Company limited to the purpose of publicization, even without the explicit consent of the data owners.
- ***In the event that personal data processing is mandatory for the establishment, exercise or protection of a right,*** the Company may process the personal data of the data subject without the explicit consent of the data subjects within the scope of the obligation.
- ***Provided that it does not harm the fundamental rights and freedoms of the data subject, if data processing is mandatory for the legitimate interests of the data controller,*** personal data may be processed by the Company, provided that the balance of interests of the Company and the data subject



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is observed. In this context, in the processing of data based on legitimate interest, the Company first determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data subject and performs the processing activity if it is of the opinion that the balance is not disturbed.

3.3. Conditions for Processing Sensitive Personal Data

In Article 6 of the Law, special categories of personal data are specified in a limited number. These are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

The Company may process special categories of personal data in the following cases by ensuring that additional measures determined by the Personal Data Protection Board are taken:

- ***Processing of sensitive personal data other than health and sexual life*** can be processed if the data subject gives explicit consent or if it is explicitly stipulated by law.
- ***Personal data on health and sexual life***, can only be processed for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons under the obligation of confidentiality or authorized companies and organizations without seeking the explicit consent of the data subject.

4. TRANSFER OF PERSONAL DATA

In accordance with the additional regulations listed in Articles 8 and 9 of the Law and determined by the Personal Data Protection Board, the Company may transfer personal data domestically or abroad in case the conditions for the transfer of personal data are met.

- ***Your personal data may be transferred by the Company to third parties domestically***, provided that at least one of the data processing conditions specified in Articles 5 and 6 of the Law and explained under Title 3 of this Policy exists and the basic principles regarding the data processing conditions are complied with.
- ***In cases where the transfer of personal data to third parties abroad***, does not have the explicit consent of the person, your personal data may be transferred abroad by the Company in the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the Law and explained under Title 3 of this Employee Policy and provided that the basic principles regarding the data processing conditions are complied with.



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In the event that the country to which the transfer will be made is not one of the safe countries to be announced by the Personal Data Protection Board, personal data may be transferred to third parties abroad upon the written commitment of the Company and the data controller in the relevant country to provide adequate protection, upon the Personal Data Board's authorization of this processing and in the presence of at least one of the data processing conditions (see Policy Title 3) specified in Articles 5 and 6 of the Law. Within the general principles of the Law and the data processing conditions in Articles 8 and 9, the Company may transfer data to the parties categorized in the table below:

SHARED PARTY CATEGORIZATION	SCOPE	PURPOSE OF TRANSFER
Business Partner	Parties with which the Company establishes business partnerships while conducting its commercial activities	Sharing of personal data limited to the purpose of ensuring the fulfillment of the purposes for which the business partnership was established
Supplier	Parties that provide services for the Company to continue its commercial activities in line with the instructions received from the Company and based on the contract with the Company	Transfer limited to the receipt of outsourced services from the supplier
Legally Authorized Public Authority	Public institutions and organizations legally authorized to receive information and documents from the Company	Sharing personal data limited to the purpose of requesting information by the relevant public institutions and organizations
Legally Authorized Private Institution	Private law persons legally authorized to obtain information and documents from the Company	Sharing data limited to the purpose requested by the relevant private law persons within their legal authority

5. DISCLOSURE AND RIGHTS OF EMPLOYEES

According to Article 10 of the Law, data subjects must be informed about the processing of personal data before or at the latest at the time of processing personal data. Pursuant to the relevant article, the necessary structure has been established within the Company to ensure that data subjects are informed in all cases where personal data processing activities are carried out by the Company as the data controller. In this context;

- Please refer to section 2.2 of the Employee Policy for the purpose of processing your personal data.



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- Please refer to Section 4 of the Employee Policy for the parties to whom your personal data is transferred and the purpose of transfer.
- Please refer to sections 3.2 and 3.3 of the Policy to examine the legal reasons for processing your personal data, which can be collected through different channels in physical or electronic media.
- As a data subject, we would like to state that you have the following rights in accordance with Article 11 of the Law:
 - Learn whether your personal data is being processed,
 - Request information if your personal data has been processed,
 - To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
 - To know the third parties to whom your personal data is transferred domestically or abroad,
 - To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
 - To request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the Law and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
 - To object if a result arises against you by analyzing the processed data exclusively through automated systems,
 - In case you suffer damage due to the processing of your personal data in violation of the Law, to demand the compensation of the damage.

You can submit your applications for your rights listed above to our Company by filling out the Company Data Owner Application Form available at <https://www.qvvengineering.co/> Depending on the nature of your



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request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

During the evaluation of the applications, the Company first determines whether the person making the request is the real right holder or not. However, the Company may request detailed and additional information to better understand the request when deemed necessary.

Responses to data subject applications by the Company are notified to data subjects in writing or electronically. If the application is rejected, the reasons for rejection will be explained to the data subject with justification.


6. DELETION, DESTRUCTION, ANONYMIZATION OF EMPLOYEE PERSONAL DATA

According to Article 7 of the Law, although it has been processed in accordance with the legislation, in the event that the reasons requiring its processing disappear, the Company deletes, destroys or anonymizes the personal data of the employees ex officio or upon the request of the employee in accordance with the guidelines published by the Company.

7. SCOPE OF THE LAW AND LIMITATIONS ON ITS APPLICATION

Pursuant to Article 28 of the Law, the following situations are excluded from the scope of the Law:

- Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that personal data are not disclosed to third parties and the obligations regarding data security are complied with.
- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public safety, public order, economic security, privacy of private life or personal rights or does not constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.

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- Processing of personal data by judicial or enforcement authorities in relation to investigations, prosecutions, trials or executions.

Pursuant to Article 28 of the Law, in the cases listed below, the Company is not required to disclose information to its employees and the employees will not be able to exercise their rights set forth in the Law, except for their rights regarding the compensation of their losses:

- Processing of personal data is necessary for the prevention of crime or criminal investigation.
- Processing of personal data made public by the person concerned.
- Processing of personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by competent and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.
- Personal data processing is necessary for the protection of the economic and financial interests of the State in relation to budget, tax and financial matters.

8. ANNEX 1: DEFINITIONS

DEFINITION	
Open Consent	Consent on a specific subject, based on information and expressed with free will
Anonymization	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data
Employee	Real persons who are employees of the company
Employee Candidate	Real persons who are not employees of the Company, but who have the status of candidate employee of the Company through various methods
Personal Health Data	Any health information relating to an identified or identifiable natural person
Personal Data	Any information relating to an identified or identifiable natural person
Data Subject	Natural person whose personal data is processed
Processing of Personal Data	Any operation performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or



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	partially automatic means or by non-automatic means provided that it is part of any data recording system
Law	Law No. 6698 on the Protection of Personal Data published in the Official Gazette dated April 7, 2016 and numbered 29677
Sensitive Personal Data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Policy	QVV Engineering UK Limited. Company Policy on Processing and Protection of Personal Data
Company/Firm	QVV Engineering UK Limited.
Business Partners	Persons with whom the Company has established partnerships within the scope of contractual relations within the framework of its commercial activities
Data Subject	Natural person whose personal data is processed
Data Processor	Natural and legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller
Data Controller	The person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically

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