

## **Informative Text on the Processing of Personal Data**

As the coordinator of the AI4Labour Project, Kadir Has University (“the university”), we pay maximum sensitivity regarding the security of your personal data. With this awareness, we, as the university, attach great importance to the processing and retention of all personal data of all individuals associated with the University pursuant to Law No. 6698 on the Protection of Personal Data (“PPD Law”). With a full understanding of this responsibility and acting in the capacity of “Data Supervisor” defined within the scope of the PPD Law, we process your personal data as explained below and within the limits prescribed by the legislation.

### *1. Collection, Processing and Processing Purposes of Personal Data*

The personal data acquired may vary depending on your relationship with our project; however, all your data shall be collected verbally, in writing or electronically, by automatic or non-automatic methods, through the departments and relevant units of the University, website, social media channels, mobile applications and similar means. Your personal data may be collected and updated as long as your relationship with our project is maintained.

### *2. To Whom and For What Purpose the Processed Personal Data Can Be Transferred*

Your personal data may be transferred/disclosed to our business partners, suppliers, legally authorized public institutions and private persons in line with the personal data processing terms, conditions and purposes specified in Articles 8 and 9 of the PPD Law in accordance with the purposes such as allowing the relevant business units to carry out the necessary work in order for you to benefit from the services offered by our university, ensuring the legal and commercial security of our university and those who are in business relations with our university (administrative operations for communication carried out by our university, ensuring the physical security and supervision of the university locations, legal compliance, financial affairs, etc.), determining and implementing the commercial and business strategies of our university and executing the human resources policies of our university.

### *3. Methods and Legal Grounds of Personal Data Collection*

Your personal data are acquired verbally, in written or via any electronic environment in order to provide our services in line with the above-mentioned purposes and to completely and accurately fulfill our University’s contractual and legal responsibilities. Your personal data collected for this legal reason can be also processed and transferred within the context of the terms and purposes of personal data processing specified in articles 5 and 6 of Privacy Act with the purposes specified in articles (1) and (2) of this text.

### *4. Rights of Personal Data Owner as Per Article 11 of PPD Law*

As personal data owners, in case you send your requests regarding your rights to our University with the methods regulated below, our University will finalize the request within a maximum of thirty days depending on the nature of the request. However, if a fee is stipulated by the Personal Data Protection Authority, the fee in the tariff determined by our University shall apply. In this context, personal data owners have the right to;

- Learn whether personal data is processed or not,
- Request information regarding that if the personal data is processed,
- Learn the purpose of personal data processing and whether they are used in accordance with its purpose,
- Know the third persons to whom the personal data is transferred in the country and abroad,
- In case the personal data is processed incompletely or wrongfully, request their correction and request the transaction made within this context to be informed to the third persons to whom the personal data is transferred,

- In case the reasons requiring the processing are removed despite being processed in accordance with the provisions of Privacy Act and other relevant laws, request the personal data to be removed or destructed and request the transaction made within this context to be informed to the third persons to whom the personal data is transferred,
- Make objection to a result against himself/herself by means of the processed data to be analyzed solely through automatic systems,
- In case the personal data is damaged due to being processed against the law, request to recover the damage.

Pursuant to paragraph 1 of article 13 of Privacy Act, you can send your request regarding the use of your rights specified above to our University in written or with the other methods specified by Board of Personal Data Protection. As Personal Data Protection Authority has not yet determined any method at this stage, you are required to submit your application to our University in writing in accordance with the PPD Law. Within this framework, the channels and procedures that you will send your application in written are disclosed below for your applications to be made within the scope of article 11 of Privacy Act.

To exercise your rights stated above; you may submit your request specifying your explanations regarding which of the rights specified in Article 11 of the PPD Law you want to use by filling out the form at [www.khas.edu.tr](http://www.khas.edu.tr) and delivering a printed and signed copy at hand, through a public notary or via other methods specified in the PPD Law to the 'Kadir Has Üniversitesi Kadir Has Cad. Cibali 34083 İstanbul' address together with the necessary personal identity information or you can deliver the relevant form to [khas@hs01.kep.tr](mailto:khas@hs01.kep.tr) with a secure electronic signature.

### **Transfer of Personal Data**

Personal data that you provide while in the EU countries, may be transferred to outside of EU . The GDPR permits such transfer when necessary for the performance of a contract between you and Kadir Has University, or if Kadir Has University obtains your explicit consent to such transfer. In transferring your personal data to a processor, Kadir Has University will employ suitable safeguards, including those described in the Information Security section below, to protect the privacy and security of your personal data so that it is only used in a manner consistent with your relationship with the University and this privacy notice.

### **How Long Will Your Personal Data Be Stored?**

The GDPR requires that your personal data be kept no longer than necessary. The applicable time period will depend on the nature of such personal data and will also be determined by legal requirements imposed under applicable laws and regulations. If you have specific questions concerning how long a certain type of personal data will be retained, please contact the Controller at [gdpr@khas.edu.tr](mailto:gdpr@khas.edu.tr)

### **You Have Certain Rights to Control Your Personal Data**

Articles 15-21 of the GDPR give you the right to control your personal data by directing Kadir Has University, as controller, to do one or more of the following, subject to certain conditions and limitations:

- allow you to access your personal data to see what information the University has collected concerning you;
- correct (rectify) any inaccuracy in your personal data;
- delete (erase) your personal data, unless Kadir Has University can demonstrate that retention is necessary or that Kadir Has University has other overriding legitimate grounds for retention;
- restrict the processing of your personal data;
- transfer your personal data to a third party (portability); and
- upon your objection, stop processing personal data when Kadir Has University is relying on a legitimate interest basis for processing such data unless Kadir Has University can demonstrate

compelling legitimate grounds for processing that override your interests in prohibiting such processing.

*If You Consent to the Processing of Your Data, You Can Withdraw Such Consent*

### **GDPR Remedies Include the Right to File A Complaint with The Supervisory Authority**

If you believe your privacy rights under the GDPR have been violated, the GDPR gives you the rights and remedies set forth in GDPR Articles 77-82. These include the right to file a complaint with the EU data protection supervisory authority.

### **Information Security**

All personal data and special categories of sensitive personal data collected or processed by Kadir Has University under the scope of this Policy must comply with the security controls and systems and process requirements and standards as set forth in the Kadir Has University Data Classification and Handling Policy.