

Kale Havacılık

**KALE AERO
POLICY ON THE PROTECTION
OF PERSONAL DATA**

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Kale Aero

Policy on the Protection of Personal Data

As Kale Aerospace Industry Co. (hereinafter referred to as “KALE AERO”), we have embraced the principle of protecting all personal data which we collect from natural persons and, in the same scope, fulfilling the requirements laid down in the Law on the Protection of Personal Data and the other relevant legislation.

KALE AERO has assumed responsibilities for establishing the necessary organisation and implementing and adapting technical measures to protect the privacy and integrity of information under the relevant applicable legislation in the capacity of a data controller.

KALE AERO implements the measures necessary to protect personal data against unauthorised access or any loss, inappropriate use, disclosure, alteration, or destruction of such information. Once any violation has come to its attention,

KALE AERO informs the respective users of such occurrence without delay, allows for the follow-up of the matter in line with the legislation, and secures such information in the best way possible.

1. Definition of Personal Data

The term “personal information” as employed in the present Policy on the Protection of Personal Data refers to any piece of information that may be associated with a natural person including name, surname, date of birth, place of birth, telephone number, motor vehicle licence plate, social security number, passport number, resumé, picture, visual and audio records, fingerprints, and e-mail address.

2. Legal Basis for the Collection of Personal Data

The use of personal data belonging to users is governed by a variety of legislative instruments. The principles relating to the protection of personal data are established most notably by Article 20 of the Constitution, as well as the Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes

Committed by Means of Such Publication and the Law No. 6698 on the Protection of Personal Data and the relevant secondary legislation.

3. Our Principles in Processing Personal Data

Our company follows the principles specified below in all personal data processing activities:

- Lawfulness and conformity with rules of bona fides
- Accuracy and being up to date, where necessary
- Being processed for specific, explicit and legitimate purposes
- Being relevant with, limited to and proportionate to the purposes for which they are processed
- Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed

4. Practices in Protecting Personal Data

- All personal data processing activities fall within the scope of our policy. This process also covers the processing of personal data and personal data of a special nature belonging to our customers, employees, suppliers, and business partners.
- Our company;
 - Implements the technical and administrative measures and conducts the auditing necessary to prevent unlawful processing of personal data, to prevent unlawful access to personal data, and to protect such personal data.
 - Retains personal data for the period prescribed in the relevant laws or required for the specific purpose of personal data processing
 - Provides relevant information and clarification to data subjects upon request
 - Acts in line with the requirements specified in the law with respect to the in-house and external transfer of personal data

- Implements training programmes to raise awareness on the protection of personal data and confers responsibilities and obligations to relevant individuals
- Follows up the currency of data in line with the information declared thereby in VERBIS

5. Organisation of Personal Data Management

Our company secures the organisation of personal data management with a Senior Management Representative, a Committee for the Protection of Personal Data, and all employees and mandated third parties

6. Duties and Responsibilities

Committee for the Protection of Personal Data

- To designate an Auditor for Personal Data Management and to implement actions upon assessing the results of relevant internal audits
- To formulate policies and procedures, to identify risks, and to take actions for the processing and protection of personal data
- To manage applications received from owners of personal data, to conclude the same with final decisions, and to ensure timely responses to the same
- To ensure that the personal data processing inventory be kept current and due notifications be communicated to VERBIS

Contact Person

- To secure communication with the organisation
- To manage complaints and requests received from data subjects and to keep records of such proceedings

Manager for the Protection of Personal Data

- To secure the smooth functioning of the committee.
- To establish, operate, and revise Personal Data Management in line with the policy

- To implement training and awareness-raising activities on personal data management

Auditor for the Management of Protection of Personal Data

- To conduct an audit on the operation of personal data management in line with the relevant laws and regulations
- To prepare periodical (annual, quarterly, monthly, etc.) audit plans and questionnaires and to conduct the relevant audits
- To prepare an audit report and to present the same to the Committee for the Protection of Personal Data

Data Protection Representatives

- To ensure that the department they represent implements the Policies and Procedures for the Management of Personal Data as required
- To raise awareness in the department they represent on the security of personal data
- To ensure the accuracy, currency, and security of personal data in the department they represent and to notify the Manager for the Protection of Personal Data of any violation therein

All Employees and Mandated Third Parties

- To comply with all policies and procedures notified thereto with respect to the management of personal data
- To notify the Manager for the Protection of Personal Data or the Data Protection Representative in their department of any violation or non-compliance

7. Rights of Data Subjects under the Law on the Protection of Personal Data

We would like to remind you that, under the Law on the Protection of Personal Data, you are entitled;

- a. To learn whether his personal data are processed or not
- b. To request information if his personal data are processed
- c. To learn the purpose of his data processing and whether this data is used for intended purposes
- d. To know the third parties to whom his personal data is transferred at home or abroad
- e. To request the rectification of the incomplete or inaccurate data, if any
- f. To request the erasure or destruction of his personal data under the conditions laid down in Article 7
- g. To request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred
- h. To object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject
- i. To request compensation for the damage arising from the unlawful processing of his personal data

8. Policy Updates

We may revise, amend or renew our policy and our means of processing personal data from time to time. In case of any such update, we will release the updated policy on our Website at www.kaleaero.com. Any updated term will enter into effect as of its respective date of publication.

Data Owners wishing to communicate their questions, opinions, or requests must do so by filling in the Data Subject Application Form and delivering the same either personally or through certified mail or to kh-kvkk@kaleaero.com. Any such application will be provided with a written response within 30 days.

Kale Aero

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