

Clarification Text

FENERBAHÇE UNIVERSITY

GENERAL CLARIFICATION TEXT WITHIN THE SCOPE OF THE PERSONAL DATA PROTECTION LAW NO. 6698

Our University exercises maximum diligence in processing and protecting your personal data in accordance with the Personal Data Protection Law No. 6698 ("KVKK"). As the data controller, all necessary technical and administrative measures have been taken to prevent the unlawful processing of personal data, to prevent unlawful access to personal data, and to ensure the preservation of personal data. In accordance with Article 10 of the Law, we are informing you via this clarification text and the policies created to cover students, suppliers, managers and employees, the board of trustees, employees, employee candidates, visitors, public institutions and organizations, employees of private legal entities, and relevant third parties. This clarification text has been prepared by FENERBAHÇE UNIVERSITY ("University") in its capacity as the data controller within the scope of Article 10 of the Personal Data Protection Law No. 6698 ("Law") and the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation to Inform.

1. Data Controller

FENERBAHÇE UNIVERSITY (Atatürk Mah. Ataşehir Bulvarı Metropol Ataşehir/ISTANBUL) processes your personal data in its capacity as the "Data Controller" as defined in Article 3 of the Personal Data Protection Law No. 6698.

2. For What Purposes Are Personal Data Processed?

In accordance with KVKK No. 6698, the personal data you share with our University is processed by our University as the subject of any operation performed upon personal data, whether fully or partially by automatic means, or by non-automatic means provided that they are part of any data filing system; such operations include obtaining, recording, storing, altering, or rearranging the data.

Personal data processed within the scope of University activities are processed in accordance with the relevant legislation for the following purposes.

Accordingly:

- **Identity Information** (Name and Surname, Mother's and Father's Name, Mother's Maiden Name, Date of Birth, Place of Birth, Gender, Marital Status Information, Civil Registry Information, Serial-Sequence Number, TR Identity Number, Signature, Nationality, Passport Number).
- **Contact Information** (Address, Phone Number, E-Mail Address, Registered Electronic Mail Address (KEP)).

- **Transaction Security Information** (MAC Address, IP Address Information, User Name, Password Information, Website Login and Logout Information).
- **Personnel Information** (Payroll Information, Employment Entry Document Records, Performance Evaluation Reports, Minimum Living Allowance (AGI), SSI Occupation Code, File and Debt Information Regarding Execution Proceeding Files, Statement of Employment, Incapacity Report, SSI Service Breakdown, Embezzlement Form).
- **Risk Management Information** (Information Processed for the Management of Commercial, Technical, and Administrative Risks).
- **Physical Space Security** (Camera Recording).
- **Legal Action Information** (Personal Information in Correspondence with Judicial Authorities, Lawsuit and Execution Files).
- **Customer Transaction Information** (Name, Surname, T.R. Identity Information, Invoice Information, Information on Teller Receipts, Order Information, Request Information, Call Center Records, Check and Promissory Note Information).
- **Finance Information** (Account No, IBAN No, Salary Information, Overtime Duration, File and Debt Information Regarding Execution Proceeding Files, Individual Pension System (BES), Expense Receipts, Account Information, Invoice Information, Balance Sheet Information, Financial Performance Information, Credit and Risk Information, Asset Information).
- **Professional Experience Information** (Title, Educational Information, Diploma Information, Resume, In-Service Training Information, Certificates, Courses Attended, Transcript Information).
- **Marketing Information** (Shopping History Information, Surveys, Cookie Records, Information Obtained Through Campaign Studies, Targeting Information).
- **Audio and Visual Data Information** (Photograph, Voice Recording, Video Recording).
- **Health Information** (Information on Disability Status, Health Reports, Blood Group Information, Test Results).
- **Philosophical Belief, Religion, Sect, and Other Beliefs** (Religion (Religion Section on Old ID Cards)).
- **Information on Criminal Convictions and Security Measures** (Criminal Record, Information on Security Measures).
- **Other Information - Other - Family - Reference Information** (Reference Name, Reference Title, Reference Number, Spouse's Name and Surname, Number of Children, Relative's Name and Surname).
- **Other Information - Other - Student Information** (Student Number, Diploma Information, High School Graduation Information, Education Information, Department and Grade Information, Transcript, Disciplinary Information).

Your personal data, which you share directly or indirectly with our University, such as complaints or requests submitted via the website and records regarding the

transactions made during the evaluation and management process of these, are processed and protected in accordance with the Personal Data Protection Law No. 6698 and relevant legislation, strictly limited to University activities.

The purposes of personal data processing by our University are specified in the items below:

- Fulfilling the burden of proof as evidence in legal disputes between the University and third parties.
- Ensuring corporate and personal development due to participation in training, seminars, or organizations organized by our University.
- Ensuring corporate communication with the University.
- Ensuring the corporate quality of the University and the security of the related persons it contacts.
- Maintaining the finance and accounting affairs of the University.
- Developing the University's services and maintaining its corporate development activities.
- Planning and executing human resources processes, and fulfilling employment and internship application processes.
- Creating personnel files and fulfilling financial obligations.
- Making necessary legal notifications to relevant public institutions and organizations as required by legislation.
- Fulfilling legal obligations within the scope of University activities.
- Establishing your contact with our University, your use of our website related to University activities, and establishing contact utilizing University communication information.
- Ensuring the security of the buildings and extensions belonging to the University and controlling the building entry and exits of our students, suppliers, service providers, employees, employee candidates, interns, visitors, and relevant third parties.
- Carrying out works, transactions, and processes before the KVK Authority within the scope of the KVK Law.
- Establishing contact with real and legal persons with whom the University has a legal relationship.
- Ensuring the execution and performance of contracts and protocols that the University has made or will make with its students, suppliers, employees, and relevant third parties with whom it has a legal relationship.
- Carrying out transportation and accommodation processes in the activities organized by the University.
- Taking administrative and technical measures for the University's information security.
- Ensuring the physical security of the University.

- Realizing check and promissory note collections, conducting banking transactions, enabling collections via credit card, managing the University's cash flow, and making payments.
- Executing occupational health and safety processes.
- Conducting health checks of employees.
- Executing litigation, mediation, and execution proceedings.
- Carrying out insurance transactions.
- Executing the University's sales transactions.
- Carrying out visa procedures for employees.
- Executing embezzlement processes.
- Evaluating student requests and complaints.
- Carrying out the University's audit processes.
- Executing the University's administrative processes.
- Carrying out the disciplinary processes of students and employees.
- Executing organization and invitation processes.
- Carrying out student registration procedures.
- Executing University examination processes.
- Managing the processes of Master's programs with or without a thesis.
- Executing the processes of Doctorate programs.
- Making announcements and ensuring general satisfaction, conducting alumni relations, and determining the needs of the relevant persons according to their preferences, habits, and demands.
- Ensuring the safety of the University and related persons, and protecting public health.
- Determining corporate strategies, and realizing and developing services in accordance with legislation, contracts, and technological requirements.
- Engaging in promotional activities, analyzing needs, and organizing all records and documents electronically or on paper in line with the purpose of processing.
- Facilitating sharing arising from academic necessities such as student exchange programs and graduate studies with domestic and international schools and universities.
- Fulfilling information retention, reporting, and information obligations mandated by legislation, relevant regulatory bodies, and other authorities.
- Enabling necessary works to be performed by our relevant business units so that real and/or legal third persons, institutions, and organizations (employees, visitors, suppliers, business partners, etc.) who have a relationship with the University can benefit from the activities and services of the University and/or its affiliated centers and units.
- Planning and executing the University's educational policies and processes, and carrying out academic and administrative activities.
- Ensuring the life and property safety, as well as the legal and commercial security of real and/or legal third party institutions and organizations located in

the centers and units where University works are carried out or which are affiliated with the University.

- Executing legal, financial, and administrative compliance processes, and fulfilling financial, legal, and administrative affairs.
- Supporting research related to the University's education, training, and research studies, as well as social, cultural, and academic activities.
- Executing supervision and/or regulation duties to be carried out by authorized and mandated public institutions and organizations, and professional organizations holding the status of a public institution.
- Fulfilling the information and document requests of judicial bodies, consumer arbitration committees, and/or administrative authorities.
- Conducting listing, reporting, verification, and analysis studies regarding the usage patterns of the products and services offered at our University and all its affiliated centers and units, producing statistical and scientific information regarding this matter, developing our activities and services accordingly, increasing satisfaction regarding our activities and services, and making customizations for the user within this scope.
- Conducting market research, promotion, and necessary notifications regarding our activities and services, evaluating complaints and suggestions, and contacting you directly via the communication channels shared with the University.
- For the purposes of carrying out distance education activities, your personal data are processed in accordance with the conditions and purposes determined pursuant to Articles 4, 5, and 6 of the Law.

Your personal data will not be used for any purpose other than the activities of our University.

3. To Whom and For What Purpose Are the Processed Personal Data Transferred?

Your personal data processed by our University are transferred to the relevant real and legal persons for the purposes written below, in accordance with Articles 8 and 9 of the KVK Law No. 6698. Accordingly:

- To our service providers, suppliers, and performance assistants to carry out University activities and fulfill mutual obligations.
- To relevant public institutions and organizations to fulfill legal obligations foreseen in the relevant legislation and to ensure security.
- To the persons and institutions from which health services are received and to insurance companies, the health information of employees is transferred within the scope of occupational health and safety measures to carry out the occupational health and safety processes of the relevant persons.
- To banks, financial institutions, public and private legal entities, and public officials to carry out the financial transactions of the relevant persons.

- To prosecutors' offices, courts, execution offices, and relevant legal institutions and organizations, upon request and as required by legislation, strictly limited to the purpose of the request in matters relating to public security and legal disputes.

Regarding the domestic transfer of special categories of personal data, your personal data may be transferred in cases stipulated by law for special categories of personal data other than health and sexual life, provided that the explicit consent of the relevant person is obtained.

Together with the groups of relevant persons listed above, your personal data are transferred to our University's employees, the board of trustees, legal, financial, and tax consultants, service providers within the scope of University activities, authorized public institutions and organizations such as public institutions, ministries, and judicial authorities, as well as persons, institutions, and organizations permitted by the provisions of payment services legislation, in compliance with the legislation and limited to the purpose of the transfer.

4. Data Transfer Abroad:

In accordance with the principles set out in Article 4/2 of the KVK Law, processed personal data may be transferred abroad—provided that Explicit Consent Texts are obtained separately from employees, employee candidates, students and suppliers, service providers, and visitors, or in cases stipulated in Articles 5/2 and 6/3 of the Law without seeking explicit consent—in accordance with the rules in Article 9 of the Law, only to persons and organizations resident in foreign countries that will be determined and declared by the Personal Data Protection Board ("Board") as having adequate protection. For countries determined and declared not to have adequate protection, data may be transferred strictly limited to the scope where data controllers in Turkey and the relevant foreign country commit to adequate protection in writing and the necessary permissions are obtained from the KVK Board for the relevant transfer. In this context, within the limits stipulated by Law No. 6698 and by taking all necessary measures, your personal information may be transferred abroad within the scope of your legal relationship and activity with our Institution, in compliance with the legislation and limited to the purpose of the transfer.

5. Method and Legal Reasons for Collecting Personal Data

Within the scope of University activities; encompassing students, suppliers, managers and employees of service providers, business partners, the board of trustees, employees, employee candidates, interns, visitors, public institutions and organizations, employees of private legal entities, and relevant third parties, your personal data are collected through methods including contracts made with our University, distance sales contracts and online sales transactions, records kept online, application forms, forms filled out via the website, personal data written on application forms received to maintain human resources processes, requested

documents for the created personnel file, financial information received for the establishment and maintenance of accounting, financial, and social rights, personal data processed to ensure purchasing, marketing, planning, quality, and corporate development, personal information forms processed during training, surveys, training forms, job application forms, personal information processed by automatic or non-automatic methods during your visit to University buildings and extensions and the internet web page, electronically kept data or visual recordings, personal information processed via electronic automation systems due to your explicit consent or obligations arising from legislation, within the scope of the law and the legal reasons specified below.

Your personal data are collected by our University to carry out the necessary activities and processes in accordance with International Regulations, the Constitution, the Code of Obligations, the Labor Law, the Higher Education Law, the Turkish Commercial Code, the Law on the Organization of Higher Education Institutions, the Tax Procedure Law and relevant financial legislation, the Customs Law, the Customs Regulation, Foreign Trade Legislation, the Turkish Penal Code, the Turkish Criminal Procedure Code, the Law on the Regulation of Publications on the Internet and Combating Crimes Committed by Means of Such Publications, the Regulation on the Procedures and Principles Regarding the Regulation of Publications on the Internet, the Regulation on the Processing and Privacy of Personal Health Data, the Law on the Regulation of Electronic Commerce, the Electronic Signature Law, the Electronic Communications Law, the Law on the Protection of the Consumer, the Consumer Rights Regulation in the Electronic Communications Sector, the Regulation on the Processing of Personal Data and the Protection of Privacy in the Electronic Communications Sector, the Regulation on Service Providers and Intermediary Service Providers in Electronic Commerce, the Regulation on Commercial Communication and Commercial Electronic Messages, the Foundation Higher Education Institutions Regulation, the Law on the Duties and Powers of Police, the Turkish Statistical Law, the Social Security Institution Law, the Law on the Prevention of Laundering Proceeds of Crime, the Communiqué on the Electronic General Assembly System to be Applied in the General Assemblies of Joint Stock Companies, the Trade Registry Regulation, the Private Employment Agencies Regulation, the Regulation on the Websites to be Opened by Capital Companies, the Communiqué on Processes and Technical Criteria Related to the Registered Electronic Mail System, the Regulation on the Internal Systems of Banks, the Distance Contracts Regulation, current applicable legislation, laws, regulations, and communiqués, and in accordance with the legal reasons specified in Articles 5 and 6 of Law No. 6698:

- Obtaining the explicit consent of the relevant persons whose personal data are processed.

- It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of contracts between our University and third party real and legal persons.
- It is mandatory for the University to fulfill its legal obligation.
- The personal data has been made public by the relevant person themselves.
- Data processing is mandatory for the establishment, exercise, or protection of a right.
- Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the relevant person.
- Due to it being explicitly prescribed by laws.

As stated in the Personal Data Retention and Disposal Policy prepared by our University, personal data processed within the scope of our University's activities under this policy are retained and preserved for the periods determined by our University according to the nature of the processed personal data and for the period written in the relevant legislation.

6. Rights of the Personal Data Owner According to KVKK No. 6698 (Right of Application)

Regarding your requests within the scope of Article 11 of the Personal Data Protection Law No. 6698, which "regulates the rights of the relevant person", according to the Communiqué on the Procedures and Principles of Application to the Data Controller, you may submit them to FENERBAHÇE UNIVERSITY as the data controller at the address "Atatürk Mah. Ataşehir Bulvarı Metropol Ataşehir/ISTANBUL". You, as the relevant person who is the Personal Data Owner, can deliver a signed copy of the APPLICATION FORM provided in the annex in person to the University address along with identifying documents. You can also submit it by utilizing a Secure Electronic Signature, a mobile signature, or the Electronic Mail address you have notified to our University and which is registered in our University's system to send an e-mail to kvkkkomisyonu@fbu.edu.tr. Furthermore, you can apply by sending an electronic mail to our University's Registered Electronic Mail (KEP) address fenerbahceuniversitesi@hs01.kep.tr using your Personal Registered Electronic Mail (KEP) address. You may transmit your application via personal submission, via a Notary Public, or by methods determined by the KVK Authority.

In accordance with Article 11 of the Law, everyone has the right to apply to the data controller regarding themselves to:

- Learn whether their personal data is being processed.
- Request information regarding this if their personal data has been processed.
- Learn the purpose of processing their personal data and whether they are used appropriately for their purpose.

- Know the third parties to whom personal data is transferred domestically or abroad.
- Request the correction of personal data in case it is processed incompletely or incorrectly.
- Request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK.
- Request that these operations be notified to the third parties to whom the personal data has been transferred, in case of correction, deletion, or destruction of personal data.
- Object to the occurrence of a result against the person themselves by analyzing the processed data exclusively through automated systems.
- Request compensation for the damages in case the person suffers damage due to the unlawful processing of personal data.

In accordance with Article 13/1 of the KVK Law No. 6698, to exercise your rights mentioned above, you must submit your applications to our University in writing or through the methods determined by the KVK Authority as written above. Our University will conclude the requests in your application free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board will be charged.