

# Data Protection Policy for candidate employees

## 1. Identity of the data controller

ARGELA Yazılım ve Bilişim Teknolojileri San. Tic. A.Ş. (“Argela”) processes, stores, and transfers any personal data it holds in accordance with Turkish Law No. 6698 on the Protection of Personal Data (the “KVKK”) and in line with its commitment to the security of your personal data. This Data Protection Policy regarding your personal data collected, stored, and processed by Argela in its capacity as data controller, has been drafted in order to fulfill Argela’s legal obligations as per Article 10 “Data Controller’s Obligation to Inform” of the KVKK, and the Communiqué on the Rules and Principles to Comply with when Fulfilling the Obligation to Inform, as well as to ensure compliance with Argela’s principles of accountability and transparency.

The terms “personal data”, “sensitive personal data”, and “data processing” used in this Data Protection Policy reflect the terminology used in the KVKK. The term “personal data” cited in the KVKK refers to any information relating to an identified or identifiable natural person, while the term “processing of personal data” refers to any transaction conducted with data, including acquisition, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying, or preventing the use of personal data by fully or partially automated, or non-automatic means, provided that the transaction is conducted within a data recording system.

**Data subject:** You, as a person whose personal data is processed by Argela, are considered a candidate employee by us due to your job application and a “data subject” under Turkish law.

**Data controller:** Argela Yazılım ve Bilişim Teknolojileri San. Tic. A.Ş. (“Argela”) determines the purposes for and means of processing your personal data and is responsible for the establishment and management of the data recording system in its capacity as the “data controller”.

Full address: Reşitpaşa Mah. Katar Cad. ARI Teknokent 3 No:4 İç Kapı No:502/601-604 Sarıyer, Maslak (Istanbul, Turkey)

email address: [kvkk@argela.com.tr](mailto:kvkk@argela.com.tr)

## Data Protection Policy for candidate employees

### 2. YOUR PROCESSED PERSONAL DATA, PURPOSES FOR PROCESSING IT, AND LEGAL GROUNDS

PERSONAL DATA	PURPOSES FOR PROCESSING	LEGAL GROUNDS
Name/surname, military service record, place and date of birth, ID photograph, home address, phone number, email address, educational details, previous work experience, certificates/skills, Turkish citizenship number, number of children, travel restrictions, signature, Reference's: Name/surname, phone number, email address, foreign languages spoken, former workplace(s), salary expectation, comments in reference, HR consultancy company's test results, mother's name, father's name, family details (spouse and children, date of birth, place of birth, Turkish citizenship number), educational details, graduation year, social security (SGK) details (first job entry date, social security registration number, social security group (retirement details, etc.)) social security service document, minimum subsistence form, bank details (bank name, bank account number, branch name, IBAN), diploma details,	Candidate employee/intern/student selection and placement processes	As per your explicit consent Article 5/1 of the KVKK  and  Signing/conclusion of contracts Article 5/2/c of the KVKK

### 3. To whom processed personal data can be transferred and for what purposes

Your identity details and contact information, retrieved from your collected personal data, are shared with Human Resources companies involved in our recruitment process so that you can have tests sent to you. Also, your aforementioned personal data may be transferred to Türk Telekomünikasyon A.Ş., TTNET A.Ş., TT Mobil İletişim Hizmetleri A.Ş., TT Ödeme Hizmetleri A.Ş., TTES Elektrik Tedarik Satış A.Ş. and all other group companies stated on the [tyatirimciiliskileri.com.tr](http://tyatirimciiliskileri.com.tr) web site to be used for the purposes defined in respective laws and other legislations defining the transfer of personal data, including but not limited to, employee candidate selection and replacement processes.

If requested within the framework of Article 28/1 of the KVKK, your personal data can be shared with the relevant authorities, whereby the obligation to inform you and your explicit consent are waived.

# Data Protection Policy for candidate employees

In addition, in unforeseen circumstances, your personal data may be shared with public institutions specified under Turkish Law, within the scope and limitations stipulated by the Law, if requested in cases expressly stated by the Law.

Your personal data is not shared with any institution, person or organization other than those we need to as per our legal obligations whereby the obligation to inform and your explicit consent are waived.

## 4. Methods of collecting personal data and legal grounds

In accordance with the basic principles stipulated by the KVKK and based on and limited to the grounds for which express consent is given and the conclusion of contracts as specified in Paragraph 2, Article 5 of the KVKK, your personal data is collected, both physically and electronically, through verbal or written applications to our Company's website, email address, or in person, information disclosed during interviews, recruiting companies involved in our recruitment processes, and business platforms on social media.

## 5. Your rights regarding the protection of personal data

Under the KVKK, you have the right to learn whether or not your personal data has been processed, request information if it has been processed, find out why it has been processed and whether it is being used by us in accordance with the cited purposes, learn about third parties, both at home and abroad, to whom it has been transferred, request correction if it has been incompletely or incorrectly processed, request that it be deleted or destroyed or anonymized in the event that the reasons that justified its processing no longer exist, request that third parties to whom your personal data has been transferred be notified in such cases or in case of a correction, raise an objection if you believe that the analysis of your processed data by means of exclusively automated systems produces unfavorable results for you, and request a redress if you suffer a loss due to unlawful processing of your data.

Using one of the following means, you can submit the Form for Requesting Information from the Data Controller available under the **ABOUT US/PDPL Policies and Forms** tab on <https://www.argela.com.tr> to request information on the use of your personal data:

- by visiting the following address in person: Reşitpaşa Mah. Katar Cad. ARI Teknokent 3 No:4 İç Kapı No:502/601-604 Sarıyer, Maslak, İstanbul where we can verify your ID
- by emailing our Company's **KEP** (registered electronic mail) address [argela@hs09.kep.tr](mailto:argela@hs09.kep.tr)
- by emailing [kvkk@argela.com.tr](mailto:kvkk@argela.com.tr) with your secure electronic or mobile signature
- via any other method stipulated in the KVKK and applicable legislation, so long as we can verify your ID

In accordance with Article 13 of the KVKK, the Company will respond to requests for information free of charge, as soon as possible, depending on the nature of the request and, in any case, within 30 (thirty) days at the latest. If the transaction incurs a fee, 1 TL will be charged per page. In the event that the request is rejected, the reason(s) for the rejection shall be specified in writing or electronically.

You can find more detailed information on what to look out for when requesting information in the Communiqué on the Rules and Principles for Requesting Information from the Data Controller imposed by the Personal Data Protection Authority.