

## PRIVACY NOTICE UNDER THE PERSONAL DATA PROTECTION LAW

### I-INTRODUCTION

As the Refugee Rights Turkey ("RRT"), which is the data controller within the scope of the Personal Data Protection Law No. 6698 ("KVKK"), we care about the privacy and security of your personal data. Provided that it does not harm your fundamental rights and freedoms, we try to take the necessary measures at the highest level for the processing and protection of your personal data in accordance with the processing conditions of the personal data specified in Article 5 and 6 of the KVKK. For this purpose, we would like to inform you about the purpose for which your personal data will be processed, for what purpose and to whom it will be transferred, the data processing method, legal reasons and your rights, as a data controller, within the scope of the disclosure obligation of the data controller specified in the law.

The following Privacy Notice has been prepared in accordance with the Personal Data Protection Law No. 6698 and the "Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform" published in the Official Gazette dated 10.03.2018 regarding the conferences, seminars, bulletins, information, legal support services and other activities we carry out as RRT.

### II- PRIVACY NOTICE

#### 1-Data Controller and Identity

Data Controller is Refugee Rights Turkey, Refik Saydam Cad. No:39 Dilber Apt. Daire: 14 Şişhane, Beyoğlu.

#### 2- Your Personal Data Collected and Purposes of Processing

Your personal data detailed below is collected and processed in written and digital media. The types of personal data we collect vary depending on the type of relationship you establish with us. Your information that you transfer to us within the scope specified below is mainly used to contact you in accordance with your purpose of transfer and to fulfill your application purpose, to provide you with accurate information and information about the process within the scope of our activities, to provide our legal support services by establishing a healthy communication and for the purposes specified in the table.

CATEGORY	PROCESSED PERSONAL DATA	PROCESSING PURPOSE
OUR CLIENTS	IDENTITY DATA, CONTACT DATA, VISUAL and AUDIO DATA, SPECIAL CATEGORIES OF PERSONAL DATA /INFORMATION  Your name, surname, address, your phone number	a) Carrying out the activities and procedures of the Refugee Rights Turkey, b) Follow-up and execution of legal affairs and follow-up and execution of communication processes with other official institutions, c) Informing your relatives about your legal status when necessary and upon your request, Planning emergency action, d) Providing Information to authorized Persons, Institutions and Organizations, e) Evaluation and follow-up of requests and complaints,

DANIŞANLAR	<p>your e-mail address date of birth your health, sexual life and social assistance information, your nationality criminal conviction marital status household information, education information, shelter information as well as legal information on their asylum status, Your voice recordings you left on the phone with the Association and its officials, your audio recordings and visual recordings left on messaging programs (Whatsapp, Telegram, etc.), Visual data collected from security camera recordings placed at office entrances and exits.</p>	<p>f) Creating and Tracking Visitor Records, g) Statistical purposes, h) To use as evidence in disputes that may arise, i) Providing information to prosecutors' offices, courts and relevant public officials upon request and in accordance with the legislation in matters related to public security and legal disputes, i) To be able to carry out the necessary work to enable beneficiaries to benefit from the services offered by our association, j) Planning, strategizing and implementing the work carried out with our Resource Provider operating partners, k) Resolving complaints about the services provided to service recipients and processing data access or correction requests, l) Conducting relations with service recipients and monitoring corporate governance activities, m) Creating and updating efficiency reports by obtaining information on developments in the service provided, n) Planning information security processes, establishing and managing the information technologies infrastructure, o) Risk management and ensuring business continuity, p) Follow-up of contractual processes or legal claims, r) Carrying out the activities and procedures of the Refugee Rights Association,</p>
PEOPLE WHO SIGN UP FOR OUR EMAILS AND NEWSLETTERS	<p>Details about your email address, contact preferences, any opinions you provide and information you access</p>	<p>In order to carry out the activities and procedures of the Refugee Rights Turkey within this scope and to be aware of the current bulletin and events in case you subscribe to the newsletter issued by the Association and register for the events, to contact you, to address you correctly, to inform you and to evaluate your requests and complaints,</p>
PEOPLE WHO INTERACT WITH US ONLINE THROUGH OUR WEBSITE OR SOCIAL MEDIA	<p>Your name and surname, email address, phone number, online behavior, contact preferences,</p>	<p>To evaluate the opinions you provide and the information you access and to carry out the activities and procedures of the Refugee Rights Turkey in this context.</p>
PEOPLE PARTICIPATING IN RRT EVENTS	<p>Name, surname, e-mail address, phone number, contact preferences, organization, gender, age signature and any opinions or</p>	<p>The information collected will be used to manage event registrations and send updates about our work and events, and to carry out our monitoring and evaluation and communications activities. This information helps us to provide updates on our work, manage our relationships with the organizations that fund our work, and understand which areas of our</p>

	information you provide.	work are of interest to people who participate in our work.
JOB CANDIDATES, VOLUNTEERS	Contact information such as name, surname, e-mail, telephone number and address, educational background, professional background, professional certificates	Carrying out the activities and procedures of Refugee Rights Turkey, conducting and evaluating the application process to RRT, contacting the employee candidate, providing information about the process, In order to carry out the assessment of suitability for the job, to plan the human resources process and to ensure that all processes are carried out in accordance with the legislation, to reach candidates whose applications are evaluated negatively to be contacted in case of a suitable position in the future.
SUPPLIERS AND OTHER PERSONS	Name, Surname, Address, ID Number your phone number your e-mail address work history date of birth, Bank Account Number	Execution of the activities and procedures of the Refugee Rights Turkey, Execution of Emergency Management Processes; Execution of Information Security Processes; Follow-up and Execution of Legal Affairs; Execution of Internal Audit / Investigation / Intelligence Activities; Execution of Communication Activities; Execution / Audit of Business Activities; Receiving and Evaluating Suggestions for Improving Business Processes, Execution of Business Continuity Activities; Execution of Goods / Service Procurement Processes; Follow-up of Requests / Complaints; Execution of Storage and Archive Activities, follow-up and execution of communication processes with other official institutions, Creating and Tracking Visitor Records, Making payments through the bank, Planning Human Resources Processes for the Execution of Staff Training Activities.
EMPLOYEES OF DOMESTIC AND FOREIGN ORGANIZATIONS THAT WE ARE IN CONTACT WITH FOR WORK	Name and surname, institution, e-mail address, phone number	In order to carry out the activities and procedures of the Refugee Rights Turkey, to receive and evaluate suggestions for the improvement of business processes, to ensure business continuity, to follow up on requests / complaints.

**3.Method and Legal Reason for Collecting Your Personal Data**

Your personal data may be obtained from clients who physically visit the Association Center, who have contacted our Association by phone or e-mail, and from persons who share their personal data with our Association for purposes such as establishing a commercial relationship with our Association, applying for a job, making an offer, submitting a business card, resume (cv), making an offer and other means, in a physical or virtual environment, face-to-face or distance, verbally or in writing or electronically; In addition, from websites and social media accounts used for surveys and similar purposes; website content reading or clicking movements, data provided by public databases are obtained, recorded and stored by fully or partially automatic or non-automatic means, provided that they are part of any data recording system.

The Personal Data in the Privacy Notice are collected, recorded and stored by the RRT within the scope of Article 5 of the Personal Data Protection Law No. 6698 ("KVKK") : "It is clearly stipulated in the laws, it is directly related to the establishment or performance of a contract, it is necessary to process personal data belonging to the parties to the contract, data processing is mandatory for the data controller to fulfill its legal obligation, data processing is mandatory for the establishment, exercise or protection of a right, and 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 data subject".

#### **4. Parties to whom Your Personal Data is Transferred and Purpose of Transfer**

As Refugee Rights Turkey, your personal data that you share with us may be transferred to project partners, auditors, third parties such as suppliers, consultants, translators, financial advisors working under a service contract with the association and legally authorized public institutions, enforcement and judicial authorities, mandatory persons and institutions related to legal proceedings, legally authorized persons and institutions in accordance with the basic principles stipulated in the KVKK and within the conditions specified in Articles 8 and 9 of the KVKK. In addition, most of the software used for meetings, conferences, panels and interviews in digital environments are provided through cloud service providers on the internet. Since the data centers of these software are mostly abroad, there may be data transfer abroad due to the use of these software. However, within the scope of the projects we carry out as the Association, your personal data may be transferred to the funding organizations whose headquarters are abroad, provided that it is limited to the nature of the work carried out.

Your personal data may only be transferred abroad

- You have your explicit consent or
- In cases where your explicit consent is not provided but one or more of the other data processing conditions specified in the Law are met,
- There is adequate protection in the country where the data is transferred,
- In the absence of adequate protection in the country where the data is transferred

It can be realized provided that the Refugee Rights Turkey undertakes adequate protection in writing with the Data Controller in the relevant foreign country and obtains the permission of the Personal Data Protection Board. Countries with adequate protection are determined and announced by the Personal Data Protection Board.

#### **5. Your Rights Pursuant to Article 11 of KVKK**

Article 11 of Law No. 6698 defines the rights of data subjects on their own personal data. In this context, real persons whose information and data are processed within RRT may submit their requests within the scope of Article 11 of the Law "regulating the rights of the data subject" in accordance with the "Communiqué on the Procedures and Principles of Application to the Data Controller" to the Refugee Rights Turkey at Evliya Çelebi, Şişhane, Evliya Çelebi Dilber Apt, Refik Saydam Cd. No: 39 D.14, 34440 Beyoğlu/Istanbul or info@mhd.org.tr. Your information request will be responded within 30 days. Personal Data Subjects may direct their questions, opinions or requests to any of the following communication channels.

<b>APPLICATION METHOD</b>	<b>ADDRESS TO APPLY</b>	<b>INFORMATION TO BE SPECIFIED AT THE APPLICATION SUBMITTING</b>
Personal application with wet signature (Applicant's application with a document certifying her/his identity) or notification through a notary public	Evliya Çelebi, Şiřhane, Evliya Çelebi Dilber Apt, Refik Saydam Cd. No: 39 D: 14, 34440 Beyođlu/İstanbul	"Information Request Under the Personal Data Protection Law" will be written on the envelope/notification.
Application with the E-Mail Address Found in Our System	info@mhd.org.tr	"Information Request Under the Personal Data Protection law" will be written in the subject line of the e-mail.
Application with an e-mail address that is not in our system (Applicant's application using an e-mail address that does not exist in our Association's system, including mobile signature / e-signature)	info@mhd.org.tr	"Information Request Under the Personal Data Protection law" will be written in the subject line of the e-mail.