

Mülteci  
Hakları  
Merkezi

Refugee  
Rights  
Turkey

**Refugee Rights Turkey**

**PERSONAL DATA PROTECTION AND PROCESSING POLICY**

**Approver:** Ethics and Compliance Manager - Deputy Director

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**MÜLTECİ HAKLARI MERKEZİ – REFUGEE RIGHTS TURKEY**

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## **REFUGEE RIGHTS TURKEY PERSONAL DATA PROTECTION AND PROCESSING POLICY**

### **SECTION 1 - INTRODUCTION**

#### **1.1 Introduction**

The protection of personal data is among the most important priorities of the Refugee Rights Turkey ("RRT") and it makes maximum efforts to comply with all applicable legislation in this regard. Within the framework of this Personal Data Protection and Processing Policy ("Policy"), the principles adopted in the execution of personal data processing activities carried out by RRT and the basic principles adopted in terms of the compliance of RRT's data processing activities with the regulations in the Personal Data Protection Law No. 6698 ("Law") are explained and thus RRT provides the necessary transparency by informing the personal data owners.

#### **1.2 Scope**

This Policy is related to all personal data of persons other than the employees of RRT ( data processing policy of RRT is regulated with another policy document) which are processed in whole or in part by automatic means or by non-automatic means provided that they are part of any data recording system. Detailed information on the personal data owners in question can be found in Annex 1 ("Annex 1- Personal Data Owners, Categories and Processing Purposes") of this Policy.

#### **1.3 Implementation of the Policy and Related Legislation**

The relevant legal regulations in force regarding the processing and protection of personal data will primarily apply. In case of incompatibility between the legislation in force and the Policy, RRT accepts that the legislation in force will be applied. The Policy regulates the rules set forth by the relevant legislation by concretizing them within the scope of the RRT's practices.

### **SECTION 2 - ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA**

#### **2.1. Ensuring the Security of Personal Data**

In accordance with Article 12 of the Law, RRT takes the necessary measures according to the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or other security deficiencies that may occur in other ways. In this context, RRT takes administrative measures and conducts audits to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board ("Board").

#### **2.2. Protection of Special Categories of Personal Data**

The Law attaches special importance to certain personal data due to the risk of causing victimization or discrimination when processed unlawfully. These data are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data. RRT acts sensitively in the protection of special quality personal data, which are determined as "special category" by the Law and processed in accordance with the law. In this context, the technical and administrative measures taken by RRT for the protection of personal data are carefully implemented in terms of special categories of personal data and necessary audits are provided within RRT. Detailed information on the processing of sensitive personal data is provided in section 3.3 ("Processing of Sensitive Personal Data") of this Policy.

### **2.3. Awareness Raising and Supervision of Units on Protection and Processing of Personal Data**

RRT ensures that the necessary trainings are organized for units in order to raise awareness to prevent unlawful processing of personal data, unlawful access to personal data and to ensure the protection of personal data. Necessary systems are established in order to raise the awareness of the employees of RRT on the protection of personal data, and if necessary, RRT works with consultants on the subject. In this direction, RRT evaluates the participation in the relevant trainings and information sessions and updates and renews its trainings in parallel with the updating of the relevant legislation.

## **SECTION 3 - ISSUES RELATED TO THE PROCESSING OF PERSONAL DATA**

### **3.1. Processing of Personal Data in Compliance with the Principles Stipulated in the Legislation**

#### **3.1.1. Processing in accordance with the Law**

RRT acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. Within this framework, personal data are processed to the extent and limited to the extent required by the activities of RRT.

#### **3.1.2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary**

RRT takes the necessary measures to ensure that personal data is accurate and up-to-date throughout the period of processing and establishes the necessary mechanisms to ensure the accuracy and currency of personal data for certain periods of time.

#### **3.1.3. Processing for Specific, Explicit and Legitimate Purposes**

RRT clearly sets out the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with its activities.

#### **3.1.4. Being Relevant, Limited and Proportionate to the Purpose of Processing**

RRT collects personal data only to the extent and quality required by its activities and processes it limited to the specified purposes.

#### **3.1.5. Storage for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed**

RRT retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legal legislation to which the relevant activity is subject. In this context, RRT first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner's application and with the specified destruction methods (deletion and/or destruction and/or anonymization). The deletion, destruction and anonymization of the RRT's data are regulated in the Personal Data Storage and Destruction Policy.

### **3.2. Terms of Processing of Personal Data**

Except for the explicit consent of the personal data owner, the basis of the personal data processing activity may be only one of the following conditions, or more than one condition may be the basis of the same personal data processing activity. In the event that the processed data is personal data of special nature, the conditions specified in section 3.3 of this Policy ("Processing of Personal Data of Special Nature") shall apply.

i. Explicit Consent of the Personal Data Owner

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be related to a specific subject, based on information and free will.

In the presence of the following personal data processing conditions, personal data may be processed without the explicit consent of the data subject.

ii. Explicitly Stipulated by Laws

If the personal data of the data subject is explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, it will be possible to mention the existence of this data processing condition.

iii. Failure to Obtain Explicit Consent of the Data Subject Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect the life or physical integrity of himself/herself or another person.

iv. Direct Relevance to the Establishment or Performance of the Contract

Provided that it is directly related to the establishment or performance of a contract to which the data subject is a party, this condition may be deemed to be fulfilled if the processing of personal data is necessary.

v. Fulfillment of the Association's Legal Obligation

Personal data of the data subject may be processed if processing is mandatory for our Association to fulfill its legal obligations.

vi. Publicization of Personal Data by the Personal Data Owner

In case the data owner has made his/her personal data public, the relevant personal data may be processed limited to the purpose of publicization.

vii. Data Processing is Mandatory for the Establishment or Protection of a Right

Personal data of the data subject may be processed if data processing is mandatory for the establishment, exercise or protection of a right.

viii. Data Processing is Mandatory for the Legitimate Interest of our Association

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our Association.

### **3.3. Processing of Special Categories of Personal Data**

Sensitive personal data are processed by RRT in accordance with the principles set out in this Policy and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

(i) Sensitive personal data other than health and sexual life may be processed without seeking the explicit consent of the data subject if it is explicitly stipulated in the law, in other words, if there is a clear provision regarding the processing of personal data in the law to which the relevant activity is subject. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such special categories of personal data.

(ii) Sensitive personal data relating to health and sexual life may be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking explicit consent. Otherwise, the explicit consent of the data subject shall be obtained in order to process such special categories of personal data.

### **3.4. Informing Personal Data Subject**

RRT informs personal data subjects in accordance with Article 10 of the Law and secondary legislation. In this context, the Association informs the data subjects about who is the data controller, for what purposes personal data is processed, with whom it is shared for what purposes, by which methods it is collected and its legal reason and the rights of data subjects within the scope of the processing of their personal data. This information is provided to the beneficiaries who reach our Refugee Help Desk by listening to a voice recording.

### **3.5. Transfer of Personal Data**

RRT may transfer the personal data and sensitive personal data of the personal data owner to third parties (third party institutions, public and private authorities, third real persons) by taking the necessary security measures in line with the lawful personal data processing purposes. In this direction, RRT acts in accordance with the regulations stipulated in Article 8 of the Law. Detailed information on this subject can be found in Annex 2 of this Policy ("Annex 2- Third Parties to whom Personal Data is Transferred by our Association and the Purposes of Transfer").

#### **3.5.1 Transfer of Personal Data**

Even without the explicit consent of the personal data owner, if one or more of the following conditions exist, personal data may be transferred to third parties by our Association by taking due care and taking all necessary security measures, including the methods stipulated by the Board.

Even without the explicit consent of the personal data owner, personal data may be transferred to third parties by taking all necessary security measures, including the methods stipulated by the Board, with due diligence by our Association in the presence of one or more of the following conditions.

- The relevant activities regarding the transfer of personal data are clearly stipulated in the laws,
- The transfer of personal data by the Association is directly related and necessary for the establishment or performance of a contract,
- The transfer of personal data is mandatory for our Association to fulfill its legal obligations,
- Transfer of personal data by our Association in a limited manner for the purpose of publicization, provided that the personal data has been made public by the data owner,
- The transfer of personal data by the Association is mandatory for the establishment, use or protection of the rights of the Association or the data subject or third parties,

- It is mandatory to carry out personal data transfer activities for the legitimate interests of the Association, provided that it does not harm the fundamental rights and freedoms of the data owner,
- It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

In addition to the above, personal data may be transferred to foreign countries declared by the Board to have adequate protection ("Foreign Country with Adequate Protection") in the presence of any of the above conditions. In the absence of adequate protection, in accordance with the data transfer conditions stipulated in the legislation, personal data may be transferred to foreign countries where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and where the Board has permission ("Foreign Country Where the Data Controller Undertakes Adequate Protection").

### **3.5.2 Transfer of Special Categories of Personal Data**

Sensitive personal data may be transferred by our Association in accordance with the principles set out in this Policy and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

(i) Sensitive personal data other than health and sexual life may be processed without the explicit consent of the data owner if it is explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data subject shall be obtained.

(ii) Sensitive personal data relating to health and sexual life may be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking explicit consent. Otherwise, the explicit consent of the data subject shall be obtained.

In addition to the above, personal data may be transferred to Foreign Countries with Adequate Protection in the presence of any of the above conditions. In the absence of adequate protection, it may be transferred to Foreign Countries where there is a Data Controller Committed to Adequate Protection in line with the data transfer conditions stipulated in the legislation.

## **SECTION 4- CATEGORIZATION OF PERSONAL DATA PROCESSED BY RRT AND PURPOSES OF PROCESSING**

In accordance with Article 10 of the Law and secondary legislation, personal data are processed by RRT by informing the relevant persons in accordance with Article 10 of the Law and secondary legislation, in line with the personal data processing purposes of RRT, based on and limited to at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, in accordance with the general principles specified in the Law, especially the principles specified in Article 4 of the Law on the processing of personal data. Within the framework of the purposes and conditions specified in this Policy, detailed information on the categories of personal data processed and detailed information about the categories and the purposes of processing personal data are included in Annex 1 of the Policy ("Annex 1- Personal Data Owners, Categories and Purposes of Processing Personal Data").

## **SECTION 5 - STORAGE AND DESTRUCTION OF PERSONAL DATA**

RRT keeps personal data for the period required for the purpose for which they are processed and in accordance with the minimum periods stipulated in the legal legislation to which the relevant activity

is subject. In this context, RRT first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner's application and with the specified destruction methods (deletion and/or destruction and/or anonymization).

## **SECTION 6 - RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS**

### **6.1. Rights of the Personal Data Owner**

Personal data subjects have the following rights:

- (1) To learn whether personal data is being processed,
- (2) Request information if personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- (4) To know the third parties to whom personal data are transferred domestically or abroad,
- (5) To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- (6) Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- (7) To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- (8) In case of damage due to unlawful processing of personal data, to demand the compensation of the damage.

### **6.2. Exercising the Rights of the Personal Data Owner**

Personal data owners will be able to submit their requests regarding their rights listed in section 6.1. ("Rights of the Personal Data Owner") to RRT by the methods determined by the Board. In this context, real persons whose information and data are processed within RRT may submit your 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 Refugee Rights Turkey, Evliya Çelebi, Şişhane, Evliya Çelebi Dilber Apt, Refik Saydam Cd. No: 39 D: 14, 34440 Beyoğlu/Istanbul or info@mhd.org.tr.

<b>APPLICATION METHOD</b>	<b>ADDRESS TO APPLY</b>	<b>INFORMATION TO BE SPECIFIED AT THE APPLICATION SUBMITTING</b>
Personal application with wet signature application with a document	Evliya Çelebi, Şişhane, Evliya Çelebi Dilber Apt, Refik Saydam	"Information Request Under the Personal Data Protection Law"

certifying her/his identity) or notification through a notary public	Cd. No: 39 D: 14, 34440 Beyoğlu/İstanbul	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.

### 6.3. RRT's Response to Applications

RRT takes the necessary administrative and technical measures to finalize the applications to be made by the personal data owner in accordance with the Law and secondary legislation. In the event that the personal data owner duly submits his/her request regarding the rights set out in section 6.1. ("Rights of the Personal Data Owner") to RRT, RRT will finalize the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

## 7. Measures Regarding the Accurate and Up-to-Date Storage of Personal Data

The Association keeps Personal Data accurate and up-to-date within the following methods:

### 7.1. Technical Measures

- Network security and application security are ensured.
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- User account management and authorization control system is implemented and monitored.
- Intrusion detection and prevention systems are used.
- Penetration testing is applied.
- Encryption is performed.
- Awareness of data processing service providers on data security is ensured.

### 7.2. Administrative Measures

- There are disciplinary regulations that include data security provisions for employees.



- Training and awareness raising activities on data security for employees are carried out at regular intervals.
- Internal policies on access, information security, use, storage and destruction have been prepared and implemented.
- Confidentiality undertakings are made.  
The authorizations of employees who change their duties or leave their jobs in this area are removed.
- Signed contracts contain data security provisions.
- Personal data security policies and procedures have been determined.
- Personal data security issues are reported quickly.
- Necessary security measures are taken for entering and exiting physical environments containing personal data.
- Physical environments containing personal data are secured against external risks (fire, flood, etc.).
- Security of environments containing personal data is ensured.
- Personal data is minimized as much as possible.
- Protocols and procedures for the security of sensitive personal data have been determined and implemented.
- Data processing service providers are periodically audited on data security.

## **SECTION 7 - THE RELATIONSHIP OF THE REFUGEE RIGHTS TURKEY POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA WITH OTHER POLICIES**

The principles of RRT's internal policies are reflected in publicly available policies to the extent relevant, and it is aimed to inform those concerned within this framework and to ensure transparency and accountability regarding the personal data processing activities carried out by RRT. In addition, internal disciplinary provisions regarding the activities of RRT employees contrary to this policy have been regulated. RRT receives notifications regarding privacy violations through the Feedback and Complaint Mechanism or the internal complaint mechanism.

### **ANNEX 1 - Personal Data Subjects, Categories and Purposes of Processing**

CATEGORY	PROCESSED PERSONAL DATA	PROCESSING PURPOSE
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<p>OUR CLIENTS</p> <p>DANIŞANLAR</p>	<p>IDENTITY DATA, CONTACT DATA, VISUAL and AUDIO DATA, SPECIAL CATEGORIES OF PERSONAL DATA /INFORMATION</p> <p>Your name, surname, address, your phone number 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>a) Carrying out the activities and procedures of the Refugee Rights Turkey,</p> <p>b) Follow-up and execution of legal affairs and follow-up and execution of communication processes with other official institutions,</p> <p>c) Informing your relatives about your legal status when necessary and upon your request, Planning emergency action,</p> <p>d) Providing Information to authorized Persons, Institutions and Organizations,</p> <p>e) Evaluation and follow-up of requests and complaints,</p> <p>f) Creating and Tracking Visitor Records,</p> <p>g) Statistical purposes,</p> <p>h) To use as evidence in disputes that may arise,</p> <p>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,</p> <p>j) To be able to carry out the necessary work to enable beneficiaries to benefit from the services offered by our association,</p> <p>k) Planning, strategizing and implementing the work carried out with our Resource Provider operating partners,</p> <p>l) Resolving complaints about the services provided to service recipients and processing data access or correction requests,</p> <p>m) Conducting relations with service recipients and monitoring corporate governance activities,</p> <p>n) Creating and updating efficiency reports by obtaining information on developments in the service provided,</p> <p>o) Planning information security processes, establishing and managing the information technologies infrastructure,</p> <p>p) Risk management and ensuring business continuity,</p> <p>q) Follow-up of contractual processes or legal claims,</p> <p>r) Carrying out the activities and procedures of the Refugee Rights Association,</p>
<p>PEOPLE WHO SIGN UP FOR OUR EMAILS AND NEWSLETTERS</p>	<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>

YOUR DATA REGARDING YOUR REQUESTS FOR LEGAL ASSISTANCE, FEEDBACK OR OTHER MATTERS THAT YOU HAVE SUBMITTED THROUGH THE "CONTACT" BOX ON OUR REFUGEE LAW INFORMATION PLATFORM WEBSITE ( <a href="https://multecihukuku.net/">https://multecihukuku.net/</a> ) OR VIA OUR E-MAIL ADDRESS	Name, Surname, Phone Number, E-mail Address, your support request and opinions	In order for Refugee Rights Turkey to contact you and to realize the purpose of your application, to inform you about your request for support, to realize your request for legal support by establishing a healthy communication and to carry out the reporting, needs analysis, capacity building activities and procedures of the Association within this scope.
YOUR REQUESTS FOR MEMBERSHIP TO THE DECISION BANK ON OUR REFUGEE LAW INFORMATION PLATFORM WEBSITE ( <a href="https://multecihukuku.net/">https://multecihukuku.net/</a> )	Name, Surname, Phone Number, E-mail Address, Province of residence, Profession	In order for Refugee Rights Turkey to process your Decision Bank registration requests, to provide you with information and contact you regarding your request for support, and to carry out the reporting, needs analysis, capacity building activities and procedures of the Association in this context.
PEOPLE WHO INTERACT WITH US ONLINE THROUGH OUR WEBSITE OR SOCIAL MEDIA	Your name and surname, email address, phone number, online behavior, contact preferences,	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.
PEOPLE PARTICIPATING IN RRT EVENTS	Name, surname, e-mail address, phone number, contact preferences, organization, gender, age signature and any opinions or information you provide.	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 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	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 /

	date of birth, Bank Account Number	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.