



**METRİK BİLGİSAYAR YAZILIM DANIŞMANLIK SERVİS SAN. TİC. LTD. ŞTİ.**

**CORPORATE PERSONAL DATA PROTECTION POLICY**

<b>Document Information</b>	
<b><u>Document Title:</u></b>	<b>Personal Data Protection Policy</b>
<b><u>Document Relevance:</u></b>	<b>This Personal Data Protection Policy is intended to plan the processes and principles to be applicable for protection of personal data at Metrik Bilgisayar Yazılım Danışmanlık Servis San. Tic. Ltd. Şti.</b>
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<b><u>Reference / Legal Basis:</u></b>	<b>Personal Data Protection Law no. 6698 and relevant regulations</b>
<b><u>Approval:</u></b>	<b>Management of Metrik Bilgisayar Yazılım Danışmanlık Servis San. Tic. Ltd. Şti.</b>



**METRİK BİLGİSAYAR YAZILIM DANIŞMANLIK SERVİS SAN. TİC. LTD. ŞTİ.**

## **CORPORATE PERSONAL DATA PROTECTION POLICY**

### **1. PURPOSE**

Everyone has the right to the protection of personal data concerning him or her under the Constitution. At Metrik, we take utmost care to ensure that you may exercise this right to the utmost degree. Hence, we attach a great deal of importance to processing and protecting your personal data in line with the applicable laws.

This Corporate Personal Data Protection Policy is intended to set forth the principles and rules to be applicable for processing and protecting personal data designated as a result of the importance attached to protection of personal data.

### **2. SCOPE**

This Policy shall govern any kind of process to be performed on the personal data controlled by Metrik such as obtaining, saving, storing, retaining, modifying, editing, describing, transferring, receiving, making available, classifying or blocking the use of personal data automatically or otherwise provided that any such non-automatic method forms part of any data recording system.

This Policy applies to all kinds of personal data belonging to Metrik’s stakeholders, officers, clients, employees, suppliers along with their officers and employees and third persons.

Metrik may amend this Policy for the purposes of compliance with the applicable regulations and decrees of the Personal Data Protection Authority and improvement in protection of personal data.

### **3. DEFINITIONS**

<b>Term/Abbreviation</b>	<b>Definition</b>
<b>Recipient Group</b>	Real or legal persons to whom personal data are transferred by the data controller.

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<b>Explicit Consent</b>	Consent that is related to a specific issue, based on information and expressed with free will.
<b>Pseudonymization</b>	The process of disabling personal data in such a way that it can no longer be associated with an identifiable real person, even when the personal data is matched with other data.
<b>Data Subject</b>	Real person whose personal data are processed.
<b>Related User</b>	Persons processing personal data within the organization of the data controller or based on the authorization and instructions of the data controller with the exception of the person or division responsible for technically storing, protecting and taking back-up of data.
<b>Destruction</b>	Deletion, destruction or pseudonymization of personal data.
<b>Law/PDPL</b>	Personal Data Protection Law no. 6698.
<b>Storage Media</b>	All kinds of media used for keeping personal data processed partially or wholly automated methods or else non-automatically provided that any such non-automatic method forms part of any data recording system.
<b>Personal Data</b>	All kinds of information related to an identified or identifiable person.
<b>Data Inventory</b>	The inventory created by data controllers in order to provide detailed information about personal data processing activities conducted on the basis of business processes in conjunction with the processing purposes and legal motives, data categories, recipient group and data subject category by duly explaining the maximum duration of storage required for fulfilling the processing purposes, personal data to be transferred abroad and measures taken for data security.
<b>Processing of Personal Data</b>	Any kind of process performed on personal data such as obtaining, saving, storing, retaining, modifying, editing, describing, transferring, receiving, making available, classifying or blocking the use of personal data automatically or otherwise provided that any such non-automatic method forms part of any data recording system.
<b>Board</b>	Personal Data Protection Board.
<b>Authority</b>	Personal Data Protection Authority.

<b>Special Categories of Personal Data</b>	Biometric and genetic information as well as personal data concerning race, ethnicity, political affiliation, philosophical belief, religion, sect or other beliefs; outer appearance; memberships to associations, foundations or unions; health; sexual orientation; convictions; and data concerning security measures.
<b>Periodical Destruction</b>	Recurrent deletion, removal or pseudonymization at periodical intervals as indicated in the personal data retention and destruction policy in the event that the legal conditions for processing personal data are no longer applicable.
<b>Policy</b>	Personal Data Protection Policy
<b>Data Processor</b>	Real or legal person authorized to process personal data on behalf of the data controller.
<b>Data Controller</b>	Real or legal person determining the purposes and methods of processing personal data and assuming responsibility for setup and management of data storage system.

## 4. GENERAL PRINCIPLES

Metrik shall check compliance of the processing of personal data with the principles provided below at the preparation phase of each work flow which requires processing of new personal data. Work flows which are not compatible with the relevant principles shall not be implemented.

While processing personal data, Metrik shall:

- (I) Comply with the law and principles of integrity.
- (II) Ensure that personal data are accurate and up-to-date if and when necessary.
- (III) Make sure that the processing purpose is specific, explicit and legitimate.
- (IV) Confirm that the data processed are relevant to the processing purpose and the processing is moderate and limited to the extent required for the purpose.
- (V) Ensure retention of personal data to the extent provided in the relevant regulation or required for the purpose of processing and destroy the personal data once the processing purpose is no longer applicable.

## 5. DATA SECURITY MEASURES



Metrik shall adopt all kinds of technical and administrative measures required for promoting a suitable level of security in order to **(i)** prevent unlawful processing of personal data, **(ii)** prevent unlawful access to personal data, and **(iii)** ensure safekeeping of personal data.

### **5.1. Technical Measures**

**(I)** The company adopts security measures for the supply, enhancement and maintenance of IT systems.

**(II)** The company keeps access logs on a regular basis.

**(III)** The company uses up-to-date anti-virus systems.

**(IV)** The company uses firewalls.

**(V)** The company adopts necessary security measures regarding access to physical environments containing personal data.

**(VI)** The company maintains security of physical environments containing personal data for protection against external risks (fire, flood etc.).

**(VII)** The company ensures security of environments containing personal data.

**(VIII)** The company implements personal data back-up procedures and ensures security of back-up data.

**(IX)** The company keeps log entries properly immune from user interventions.

**(X)** The company applies encryption methods.

### **5.2. Administrative Measures**

**(I)** The company requires employees to comply with disciplinary regulations which set forth provisions on data security.

**(II)** The company undertakes routine training and awareness raising activities to inform employees about data security at periodical intervals.

**(III)** The company has introduced and implements corporate policies on access to and information security, usage, storage and destruction of personal data.

**(IV)** The company implements data masking precautions to the extent necessary.



- (V) The company executes confidentiality undertakings.
- (VI) The company has created an authorization matrix for employees.
- (VII) The company removes the authorization granted to employees upon change of post or termination of employment.
- (VIII) The company makes sure that the contracts to be executed contain provisions on data security.
- (IX) The company has adopted personal data security policies and procedures.
- (X) The company promptly reports problems on personal data security.
- (XI) The company monitors personal data security.
- (XII) The company reduces personal data to the extent possible.
- (XIII) The company undertakes or assigns others to undertake periodical and/or random internal audits.
- (XIV) The company has determined the existing risks and threats.
- (XV) The company has adopted and implements protocols and procedures for security of special categories of personal data.
- (XVI) If special categories of personal data are to be sent by electronic mail, the company sends them with encryption through KEP or corporate mail address.
- (XVII) The company takes actions to raise awareness of data processors about data security.

## **6. DATA SUBJECT RIGHTS**

Data subjects may exercise the right to file an application to Metrik in order to:

- (I) learn whether or not their personal data have been processed,
- (II) request information about the processing, if any,
- (III) request information about the processing purpose and whether or not the use of the data is fit for the purpose,
- (IV) receive information about the recipient domestic or foreign third parties,
- (V) ask for correction in case of incomplete or incorrect processing and also demand notification of the relevant process to the third persons who are known to have received the personal data by way of transfer,



(VI) request deletion, destruction or pseudonymization of personal data once the processing purpose is fulfilled even though the processing has been performed in line with the PDPL and other legal provisions and also demand notification of the relevant process to the third persons who are known to have received the personal data by way of transfer,

(VII) object to any unfavourable result for the data subject arising from analysis of processed data with automated systems exclusively,

(VIII) demand indemnification against losses, if any, incurred as a result of processing activities in violation of the law.

## 7. NOTIFICATION OF VIOLATIONS

Metrik employees are encouraged to report to the Management any activity, action or condition which is deemed to be in violation of the provisions of the PDPL and/or this Policy. The Management shall convene and create an action plan for remedy to the extent necessary.

If the violation relates to unlawful disclosure of personal data to third parties, the Management shall **inform the data subject and Board** of the relevant violation **within 72 hours** in line with the Board decree no. 2019/10 of 24.01.2019.

## 8. VARIATIONS

All kinds of variations to the Policy shall be prepared by the relevant officers and presented to the Management of Metrik Bilgisayar Yazılım Danışmanlık Servis San. Tic. Ltd. Şti. for approval. The updated version of the Policy might be e-mailed to employees or else published on the website.

## 9. EFFECTIVE DATE

This version of the Policy entered into force upon acknowledgment of the Management on **24.04.2020**.