

As Metro Istanbul Sanayi ve Ticaret Anonim Şirketi (“**Company**” or “**METRO İSTANBUL**”), we attach great importance to process and protect your personal data in accordance with the Law No. 6698 on the Protection of Personal Data and its secondary regulations (“**KVK regulations**”).

This Clarification Text for Passengers (“**Clarification Text**”) has been prepared in order to fulfil the disclosure obligation arising from the KVK legislation as the data controller, within the scope of the personal data processing activities carried out by our Company for you.

### 1. Collection Methods of Your Processed Personal Data, Purposes of Processing and Reasons for Compliance with Law

Your personal data (“**personal data**”) specified in Table-1 below are provided by our Company, verbally or in writing, in physical or electronic media within the scope of providing the relevant services, in connection with the purposes stated in Table-1 below, in a limited and measured manner and in accordance with the principles of KVK are obtained and processed by automatic and non-automatic means in accordance with the KVK legislation.

**Table-1**

Purposes of Processing	Personal Data	Reasons for Compliance with Law
Conducting surveys within the scope of Passenger Satisfaction processes	Identity information (name, surname, age), contact information (residence information, telephone number), other (occupational information), audio recordings (voice recordings)	In the current system, express consent is obtained from the passengers by “voice recording”. If explicit consent cannot be obtained with a voice recording, the explicit consent section at the end of the document must be signed. Otherwise, the data will not be processed. <b>Explicit Consent</b>
Execution of processes related to incidents/accidents in the field	Identity information (name, surname, TR Identity Number), legal action (incident information, statement given about the event), insurance information, contact information (phone, e-mail, address), signature.	Data processing is mandatory for the data controller to fulfil its legal obligations, to establish, exercise or protect a right
	Information about the health problem related to the event	<b>Explicit Consent</b>
Recording of illegal card usage	Identity information (name, surname, parents' name, TR Identity Number, date and place of birth), contact information (address), other (information about illegal card use)	Data processing is mandatory for the legitimate interests of the data controller

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Control of vehicle and field with security camera	Physical space security information (CCTV camera recordings)	Data processing is mandatory for the legitimate interests of the data controller
Receiving Lost and Found Items	Identity Information (Name-Surname, copy of ID), Contact Information (Address, phone), Signature.	<b>Explicit Consent</b>
Pet Cage Delivery Realisation	Identity Information (Name-Surname, TR Identity Number), Contact Information, Signature.	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

## 2. Sharing Your Personal Data with Third Parties

### 2.1. Domestic Transfer

Your personal data mentioned above is transferred in accordance with the purposes and legal compliance reasons mentioned below.

**Table-2**

Transfer Purpose	Reason for Compliance with Law	Receiving Party
Execution of audit and reporting activities	It is mandatory for our company to fulfil its contractual / legal obligations	Istanbul Metropolitan Municipality
Providing information to authorized public institutions and organizations when necessary	<b>Explicit Consent</b>	Suppliers (survey company), IMM, ISBAK ...
Execution of legal processes	Obligatory for our company to fulfil its legal obligation	Authorised Public Institutions and Organisations, judicial authorities, law firms providing services
Receiving Lost and Found Items	Obligatory for our company to fulfil its legal obligation	IETT


METRO İSTANBUL undertakes not to transfer your personal data to third parties without **your explicit consent**, except for the purposes above.

### 2.2. International Transfer

Our company does not transfer your personal above-mentioned data abroad.

## 3. Protection, Storage and Disposal of Your Personal Data

Our Company processes your personal data for the period required for processing personal data, and in any case, it is retained until the end of the legal period.

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After the expiration of the retention period, your personal data is deleted, destroyed or anonymized from electronic and physical environments in accordance with the KVKK legislation in line with our ***Company's Personal Data Protection and Privacy Policy, the Protection and Confidentiality of Private Personal Data Policy, and the Personal Data Retention and Destruction Policy.***

Our Company takes all necessary technical and administrative measures in accordance with KVKK legislation in order to prevent your personal data from being accessed by unauthorised persons, erroneous processing, disclosure, alteration/deletion of your personal data for unlawful reasons, and to ensure its protection and security.

In case your personal data is damaged and/or captured/disclosed by third parties as a result of attacks on our company's physical archive and/or servers and/or other systems, our Company will immediately inform you and the Personal Data Protection Board.

#### **4. Your Right to Obtain Information**

Within the scope of Article 11 of the KVKK, you have the right to request the following by applying to our Company:


- (a)** To find out if it has been processed.
- (b)** To request information about if it has been processed.
- (c)** To learn the purpose of processing and whether it is used in accordance with its purpose.
- (d)** To be informed about the third parties to whom it has been transferred in the country or abroad.
- (e)** To request correction if it is incomplete or incorrectly processed.
- (f)** To request its deletion or destruction within the framework of the conditions stipulated in Article 7 of Law No. 6698.
- (g)** To request notification of the transactions made pursuant to articles (d) and (e) to third parties to whom personal data has been transferred.
- (h)** To object to the emergence of an unfavourable result because it is analysed exclusively by automated systems
- (i)** To demand the compensation of the damage in case of loss due to unlawful processing.

#### **5. Your Requests**

If you have any questions or requests regarding the processing of your personal data within the scope of this Clarification Text, you can apply to our Company in one of the ways specified in the Form by filling out the **Application Form to the Data Controller** located at <https://www.metro.istanbul/>

Our company will finalise application requests within 30 (thirty) days at the latest, according to the nature of the request, in accordance with Article 13 of the KVKK. If the transaction requires cost, the tariff determined by the KVK Board will be applied. If your request is rejected, the reason(s) for the rejection will be stated in our article.

If you think that your personal data processed by our company is out of date, incomplete or inaccurate, please contact our Company immediately at [metroistanbul@hs01.kep.tr](mailto:metroistanbul@hs01.kep.tr) or [kvkk@metro.istanbul](mailto:kvkk@metro.istanbul) for your change notifications regarding your personal data.

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This Clarification Text may be updated in order to comply with changing conditions and legal regulations. You can follow the updates at <https://www.metro.istanbul/>

#### Data Responsible

#### Metro İstanbul Sanayi ve Ticaret Anonim Şirketi

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*I have read and understood the clarification text.*