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Page Number	1/4

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

This Clarification Text for training and activities (“**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 KVKK are obtained and processed by automatic and non-automatic means in accordance with the KVK legislation.

Visual and audio recordings obtained from Metro Istanbul training and events can be broadcasted on the platforms listed below in order to carry out company promotion activities.

Platforms we use while carrying out company promotion activities are: Twitter, Facebook, Instagram, Our YouTube Channel, LinkedIn, Our Website, Domestic/Foreign Press and Our Internal Company Portal

Table-1

Purposes of Processing	Personal Data	Reasons for Compliance with Law
Shooting as part of training and events	Audio-visual recordings (photographs, camera recordings)	Explicit Consent
Being recognisable and identifiable of trainers and determining competency issues	Name, surname, institution information and signature	Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract
Publishing the promotional photographs and videos taken on the websites and social media accounts of our Company and IMM, shooting for the purpose of providing content for advertising campaigns and social media accounts	Identity information (name, surname), contact information (phone number, e-mail address)	Data processing is mandatory for the legitimate interests of the data controller
	Visual and audio recordings (camera recordings)	Explicit Consent

	CLARIFICATION TEXT FOR TRAINING AND ACTIVITIES	Document Number	FRM00488
		First Publication Date	14/02/2020
		Revision Number	02
		Revision Date	03/12/2021
		Page Number	2/4

Exam	Audio-visual recordings (photographs, camera recordings), name, surname, T.R. Identity Number, education information working time,	Data processing is mandatory for the data controller to fulfil its legal obligations, to establish, exercise or protect a right
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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
Carrying out company promotion activities through the website and social media accounts	Explicit Consent	Istanbul Metropolitan Municipality

METRO ISTANBUL 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.

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.

	CLARIFICATION TEXT FOR TRAINING AND ACTIVITIES	Document Number	FRM00488
		First Publication Date	14/02/2020
		Revision Number	02
		Revision Date	03/12/2021
		Page Number	3/4

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 or kvkk@metro.istanbul for your change notifications regarding your personal data.

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

Mersis Number: Address: Yavuz Selim Mahallesi, Metro
0481004100100010 Sokak, No: 3 Esenler, İSTANBUL

E-mail: kvkk@metro.istanbul

I have read and understood the clarification text.