

PwC Turkey Clarification on Protection of Personal Data

PwC Turkey* believes it is very important to protect and secure personal data. In this scope, PwC takes all technical and administrative measures, in the framework of Law No. 6698 on the Protection of Personal Data (Law or KVKK), to ensure lawful processing and storage of every kind of personal data belonging to natural persons related to PwC.

Personal data is processed within the framework of the circumstances explained below, in accordance with KVKK and other legislation. Natural persons whose personal data is processed in the scope of KVKK may obtain information by reviewing the following text clarifying what kind of personal data PwC collects as the receiver of the data, the purpose of processing, persons the information may be transferred to, collection method, legal justification and their rights concerning the said personal data.

1. What is personal data?

Within the scope of KVKK, personal data is all information that makes a natural person identifiable. Personal information to be processed (including but not limited to):

- name and surname,
- email address,
- mailing address,
- username and password,
- phone and facsimile number,
- date of birth,
- gender information, etc.

2. Purpose of processing personal data

Personal data is processed automatically and manually, via website, online services and similar media, in a spoken manner, in writing and electronically, and in line with KVKK Articles 5 and 6, in circumstances clearly expressed in the laws, to fulfil the purposes below in line with PwC Turkey's legitimate interests and in line with our Protection and Processing Personal Data Policy, on condition that the processing is directly related to setting up or carrying out a contract and that it does not damage the related person's basic rights and freedoms.

The purposes for processing personal data may be updated based on company policies and liabilities arising out of legislation. The current processing purposes are below:

- to define and apply PwC Turkey's strategies and ensure the execution of the human resources policies of the company,
- to provide for the execution of human resources policies, to supply personnel for open positions in line with PwC human resources policies, to execute human resources operations in line with PwC human resources policies and to carry out obligations in the framework of Occupational Health and Safety and take the necessary measures,
- in line with PwC's purpose, to provide the independent audit, accounting and consulting services performed by PwC Turkey's relevant business units,
- for the administrative operations, auditor independence, risk management and quality control activities performed in relation to the communications ensuring the legal and commercial security of PwC Turkey and persons in business relationships with PwC Turkey,
- for relationship management, account management, internal financial reporting and provision of IT services (storing, hosting, maintenance and support activities are included in this scope),
- to execute processes and operations, finance operations, communications, market research, social responsibility activities and purchasing operations (request, proposal, evaluation, order, budgeting, contracts) in order to determine and apply PwC Turkey's trade and business strategies,

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- to determine and apply PwC Turkey trade and business strategies, the in-house system and the method of application,
- to plan, audit and perform information security processes and set up and manage IT infrastructure,
- to plan and execute employee satisfaction and/or loyalty processes, benefits, employee authority for access to information, and tracking and audit of work activities of employees,
- to track finance and/or accounting and legal activities,
- to plan and execute market research activities for purchasing, marketing and/or promotion of work activities and services,
- to plan and execute data access authorization of partners and/or suppliers and manage relationships with partners and/or suppliers,
- to plan and execute corporate communication activities, plan and/or execute corporate risk management activities, plan and execute corporate sustainability activities, plan and execute corporate management activities,
- to plan and execute customer relations management processes, plan and/or track customer satisfaction processes, track customer demands and/or complaints,
- to carry out obligations arising out of work contracts and/or legislation (for company employees),
- to provide for the security of company fixtures and/or resources,
- to plan and execute external training activities,
- to plan and execute the operational activities necessary to perform company activities in line with company procedures and/or legislation,
- to ensure that data is accurate and up-to-date,
- to plan and execute skill/career development activities,
- to inform authorities for reasons resulting from legislation,
- to create and monitor visitor records and provide security for the company campus and plants,
- to carry out activities to ensure people benefit from the products and services provided by PwC Turkey.

PwC abides by these principles when processing personal data:

- compliance with laws and honesty,
- accuracy and updating when necessary,
- processing for specific, clear and legitimate purposes,
- having boundaries and being conservative concerning the purposes of processing,
- storing for no longer than the periods predetermined in the related legislation or the period necessary for the purposes of processing.

3. Transferring personal data

PwC Turkey is obliged to act in line with the decision taken by the Personal Data Protection Council, which is laid out in KVKK and related legislation.

PwC Turkey cannot transfer personal and private data to other natural or legal persons without the express consent of the relevant person. The data may be transferred to administrative or legal institutions and entities authorised as defined in and within the limits of legislation without the explicit consent of the relevant person in circumstances defined by KVKK and other laws.

It is also possible to transfer data without approval under the circumstances explained in Articles 5 and 6 of the Law. PwC Turkey may transfer personal data to unrelated persons in Turkey and companies in the PwC network under PwC Turkey on condition that it is transferred in line with the conditions defined in the Law and other relevant legislation, taking all the safety measures defined in legislation, and unless there is a clause stating the contrary in the Law, other relevant legislation, or, if applicable, the contract signed with the data owner.

PwC Turkey might transfer personal data being processed in Turkey, or being processed and stored overseas, to unrelated persons in Turkey or overseas, as mentioned above, including by making use of external resource usage, on condition that it is transferred in line with the conditions defined in the Law and other relevant legislation, taking all the safety measures defined in legislation, and unless a clause to the contrary clause exists in the Law, other relevant legislation, or if applicable, the contract signed with the data owner. In exceptional conditions where explicit consent is not required to transfer personal data defined in KVKK, in addition to the processing and transfer requirements it is required that sufficient protection is available in the country the data will be transferred to. KVKK shall determine the sufficient protection to be provided. In the event there is not sufficient protection, data personnel both in Turkey and overseas need to approve sufficient protection in writing, and KVKK needs to have granted permission.

Please refer to our [Protection and Processing Personal Data Policy](#) to learn about the service providers abroad from which we obtain support and for in-house electronic media and applications we utilise.

4. Method and legal reasons for collecting personal data

Personal data is collected verbally, in writing and electronically, for PwC Turkey's legitimate interests and to fulfil completely and fully the obligations arising out of contracts and laws, in line with the purposes above, to continue providing PwC Turkey services, in the circumstances clearly expressed by laws, on condition the collection is directly related to setting up or carrying out a contract and it is necessary to process personal data belonging to the parties of the contract or that it is not damaging to the related person's basic rights and freedoms. The data is processed and transferred in line with Articles 5 and 6 of the Law.

5. Your rights concerning protection of personal data

You, as the data owner, have the right to the following upon applying to PwC Turkey:

- to be informed whether your data is being processed,
- to request information if it is processed,
- to learn the purpose of any processing of your personal data and whether it is being used in compliance with that purpose,
- to be informed of any unrelated persons residing within the country or overseas to whom the data is transferred,
- to request adjustment if the personal data is processed incorrectly or in an incomplete manner,
- to request deletion or elimination of your personal data within the scope of the conditions laid out in Article 7 of the Law,
- to request that unrelated persons are informed of the actions carried out as per your right to request adjustment, deletion or elimination,
- to object to a conclusion found against you as a result of analysing and processing your personal data exclusively through automated systems,
- to request compensation if you suffer any loss should your personal data be unlawfully processed.

Requests concerning the usage of the rights mentioned above must be made in writing or electronically to the data personnel at pwcturkiye@hs03.kep.tr or to tr.dpo@tr.pwc.com, with the subject line "Personal Data Information Request", using this Application Form (can be found at <https://www.pwc.com.tr/en/aboutus/pwc-turkey-kvk-application-form.pdf>), via the email which was reported and is in the data personnel's system or by the related person, using an electronic or mobile signature defined in Electronic Signature Law No.5070.

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