**THE CLARIFICATION TEXT ON PERSONAL DATA PROCESSING**

1. **Subject**

This clarification form is presented to inform and clarify the related persons about our activities in relation to the personal data processing according to Article 10 “the obligation on clarification” in the Law on the Protection of Personal Data No. 6698 **(“The Law on PDP”)**. In this context, the other rights of the related person set out in Article 11 of the Law on PDP in relation to the methods and legal reason about the identity of the data supervisor, the purpose of personal data processing, the third persons, to which the personal data are transferred, and the purpose of data transfer are given in details as follows.

1. **Personal Data Supervisor**

According to the relation provisions set out in the Law on PDP, this person has the qualification of data supervisor of our company… and is obliged to protect your personal data. Within this scope, our company is responsible for processing, recording, saving, storing and protecting all kinds of personal data you have in accordance with the rules of law and good faith, and transferring such data to transfer and disclose to third parties under the legislative limitations which are set out by the Law for the limited purposes of data processing.

1. **Private Personal Data**

The private personal data includes the information about race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other beliefs, apparel, membership information to associations, foundations or syndicates, health, sexual life, conviction and security measures as well as biometrical and genetic data. According to the Article 6 of the Law on PDP, the private personal data is the data which may cause the discrimination or victimization against related persons, if they are disclosed. For this reason, such data are of particular importance, they may be processed, if related person gives consent or if they are permitted to disclose or processed under limited conditions set out by the law.

1. **Purpose of Processing Personal Data**

The personal data within the scope of the business agreement that you have signed/that is planned to sign, and identity, communication information and other personal data are obtained by our company according to related provisions set out in the law for following purposes

* compliance detection to related position and/or vacant positions,
* tendency to comply to corporate culture and practices,
* determination of business experience,
* getting touch with you,
* confirmation for the security of workplace and business processes,
* determination of salary and other rights,
* determining the compliance of health status to nature of business, and possession of minimum health status in case of any emergency,
* redressing the possible future labor needs through candidate personnel pool,
* possession of contact person info in case of emergency,
* meeting the mutual obligations within the scope of the business agreement that you have signed/that is planned to sign.

These obtained data are recorded according to related provisions set out in the law, saved, stored, changed, rearranged, disclosed, transferred, classified, processed in a safe physical or electronic environment during the purpose of data processing, or their use is prevented.

1. **The Persons to Whom and for Which can be Transferred**

Within the scope of abovementioned purposes and in accordance with the articles 8 and 9 set out in the Law on PDP, the obtained and processed personal data are transferred to our company’s employees, officers, auditors and consultants, independent audit companies, affiliates and group companies, business partners and service providers, from whom the services are obtained or with whom we work to maintain the services and activities for your side, and public institutions and organizations, in order to fulfill the requirements of the business agreement, keep statistics, make in-company plans, carry out the activities of marketing and information surveys. Moreover, the data, which are required to disclose by public authorities, are shared with related public institutions and organizations under the limitations set out in the law. Your personal data which are transferred under this section may be obtained, recorded, saved, stored, changed, rearranged, transferred, taken over, classified, processed or their use is prevented by third persons, to whom they are transferred, according to the legislation on protection of personal data.

1. **Transfer of Personal Data Abroad**

Our company may transfer your personal data “with express content” according to principles set out in the Art. 4/2 of the Law on PDP or “without express consent” under the circumstances set out in the Articles 5/2 and 6/3 in the same law and under the rules of Art. 9 of the said law, to only the persons or institutions in the countries with sufficient data protection system, which are detected and announced by the Personal Data Protection Board (“Board”), but for the countries, which are deemed as not having the sufficient data protection system by the Board, only if data supervisors in Turkey or related foreign country may guarantee in a written form that they commit on a sufficient data protection, and they may get the transfer permission from the Board.

1. **Collection Method of Personal Data and its Legal Base**

Our company collects your personal data through our company’s call centers, web pages as well as company’s service units with verbal and/or written tools and safe electronic media in order to develop our services and maintain our commercial activities.

1. **The Rights set out in Article 11 of the Law on PDP**

As a person, whose personal data are collected with the purposes and methods above, you are hereby informed that you have the following rights in accordance with Article 11 of the Law on PDP;

* to be informed on whether your personal data is processed or not,
* to obtain related information on the processing of personal data,
* to be informed on the purpose of personal data processing and whether your personal data is used for the said purposes or not,
* to be obtain information on third parties (in the country or a foreign country) to whom personal data is transferred,
* to request for the correction of your personal data, if your personal data is processed incompletely or incorrectly,
* to request erasure or disposal of your personal data within the scope of the provisions set out in Art. 7,
* to request notification of the operations carried out in compliance with sub-paragraphs (d) and (e) to third parties to whom your personal data has been transferred,
* to object in cases of exclusive processing of your personal data by automated systems which brings the conclusions against your side,
* to claim compensation for damages arising from the unlawful processing of your personal data.

You can submit your request to claim any of the abovementioned rights according to the clause 1, Article 13 of the Law on PDP, to our company in a written form or via other methods set out by the Personal Data Protection Board. In this case, our company will finalize your request in 30 days at the latest depending on the nature of the request.

Your request must bear the following information:

* Your name, surname, and signature, if your request is in a written form.
* Your national ID number for citizens of Turkish Republic, or passport number or foreigner ID number for foreigners,
* Notification address or business address,
* Notification e-mail, if any, or phone and fax number,
* Subject of your request.
* In addition to such information, the accompanying information and documentation, if any.

You can deliver your request by filling the form on www.kedrionbetaphar.com.tr, or deliver a hard copy of this form by hand with the documentation indicating your ID to Çankaya Mah. Cemal Nadir Sok. No: 18/1 Çankaya/Ankara – Türkiye address, or send it through a notary public or through other methods mentioned in the Law on PDP, or send the form bearing your e-signature or mobile signature via your e-mail to [kedrionbetaphar@hs01.kep.tr](mailto:kedrionbetaphar@hs01.kep.tr)