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Consultant to Chief Executive Officer

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Chief Executive Officer

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1. Purpose

This policy is intended for describing the methods adopted for processing and protection of personal data in all activities performed by Marm Assistance Destek Hizmetleri A.Ş. (Marm Assistance) in the capacity of data controller in accordance with the General Data Protection Regulation ("GDPR"), Law No 6698 on Protection of Personal Data (the Law) and for fulfilment of the obligation to inform established in Article 10 of the Law. The Policy for Processing and Protection of Personal Data involves the principles applied during collection, use, sharing, storage and destruction of personal data by Marm Assistance. It is intended for informing all persons, particularly, our clients, employees, visitors, employees of the organizations we are collaborating with and the third parties, whose personal data are processed by the company.

2. Scope

This Policy involves all personal data processed within the processes of our company either by automatic means or non-automatic means provided that it is part of any data recording systems.

3. Powers and Responsibilities

All employees, consultants, external service providers and those who otherwise store and process data are responsible for fulfilment of requirements for storage and destruction of the personal data specified by Law, Regulation and Policy within the company. Each business unit is obligated to store and protect the data produced within its own business process.

It is the responsibility of the "Data Protection Officer (DPO)" to receive or accept the notifications from or correspondences with Personal Data Protection Board on behalf of the data controller and to register the same.

4. Definitions and Abbreviations

Definition / Abbreviation	Description
Explicit Consent	The consent given regarding a certain issue, based on information and with free will.
Concerned User	Except for the person or unit responsible for storage, protection and back-up of the data technically, persons who process personal data under the organization of the data controller or in line with the authorization and instruction received from the data controller.
Destruction	Erasure, destruction or anonymization of personal data.
Law	Law No 6698 on Protection of Personal Data
Recording Media	Any media where personal data processed by fully or partly automatic means, or by non-automatic means provided that they are part of any data recording systems are present.
Personal Data	Any information on identified or identifiable natural persons
Processing of Personal Data	Any operations performed on personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, by fully or partly automatic means or provided that they are part of any data recording systems, by non-automatic means.
Anonymization of Personal Data	Rendering that the personal data can, by no means, be associated with an identified or identifiable natural person, even by matching with other data.

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Erasure of Personal Data	Erasure of personal data; rendering that the personal data cannot be accessed and reused by the Relevant User by any means.
Destruction of Personal Data	The process of rendering that the personal data cannot be accessed, retrieved and reused by any means.
Board	Personal Data Protection Board.
Sensitive Personal Data	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data.
Periodic Destruction	The process of ex-officio erasure, destruction or anonymization at recurrent intervals indicated in the personal data storage and destruction policy, in the event that all the conditions for processing of personal data laid down by the Law no longer exist
Data Subject/Concerned Person	The natural person whose personal data are processed.
Data Processor	The natural or legal person who processes personal data on behalf of the data controller based on authorization by him.
Data Controller	The natural or legal person who determines the purposes and means of processing personal data and is responsible for establishment and management of the data recording system.
Regulation	Regulation on the Erasure, Destruction or Anonymization of Personal Data published on the Official Gazette dated 28 October 2017.
Brand Client	Data subject clients with whom Data Controller clients, for whom Marm Assistance provides service in CRM and Technical Operation activities, make agreements.
Brand Executive	Data Controller clients for whom Marm Assistance provides service in CRM and Technical Operation activities.
Medical Escort	Contracted healthcare staff who escort Insured Clients who are served within the frame of activities of Medical Department of Marm Assistance and clients of Marm Assistance for health problems.
Client	Clients who directly sign contract with Marm Assistance for the services provided by Travel and Medical Departments of Marm Assistance. For these clients, Marm Assistance is the direct Data Controller.
Insured	Contracted data subjects of the Data Controller insurance companies with whom Medical Department of Marm Assistance has contracted with.

5. Policy for Processing and Protection of Personal Data

Marm Assistance concretely puts forth with this policy document the measures required for the processing and protection of personal data and the procedure applied. In case of discrepancy with this policy document and the related laws and regulations or in the event that the policy document is not up to date in accordance with the updated legislation, Marm Assistance agrees to comply with the applicable legislation. This policy document is updated according to the amendments to the law, regulation and relevant legislation and revised for fulfilment of legal obligations by Marm Assistance.

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5.1. Processed Personal Data

Marm Assistance processes the following personal data:

Data Subject	Data Categories
Employee	Biometric data, criminal record, religion, financing, camera footage, audio-visual records, information on legal transactions, contact details, log records, identity, location, occupational information, user requests, personal information, health-related information
Employee Candidate	Financing, camera footage, contact details, identity, occupational information, personal and health-related information
Relatives of Employee	Contact details, identity, personal and health-related information
Instructor	Financing, camera footage, audio-visual records, contact details, identity, occupational and personal information
Workplace Physician	Identity and personal information
Brand Client	Vehicle information, financing, audio-visual records, contact details, identity, location and client transaction (dealer, km, policy information etc. about the vehicle)
Brand Executive	Identity and contact details
Medical Escort	Financing, contact details, identity, occupational and client transaction (accommodation, flight details etc.)
Client	Biometric photo (for visa), financing, contact details, identity, occupational information, client transaction (file no, travel information, requests and complaints, vehicle and km information), personal (documents for visa) and health-related information
Potential Client	Audio-visual records, contact details, identity and title
Reference	Contact, identity and title information
Insured	Contact, identity, client transaction (file no, travel information, requests and complaints etc.) and health information
Relatives of the Insured	Contact and identity information
Intern	Biometric data, financing, camera footage, contact, identity, occupational and personal information
Supplier's Employee	Camera footage, identity and company information
Supplier Executive	Vehicle information, financing, camera footage, contact, identity and

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	personal information (SSI and tax information etc.)
Foreign Employee	Biometric data, criminal record, religion, financing, camera footage, audio-visual records, information on legal transactions, contact details, log records, identity, location, occupational information, user requests, personal information, health-related information
Visitor	Camera footage, contact details, log records and identity information

5.2. Purposes of Processing Personal Data

Marm Assistance processed personal data for the following purposes;

Purpose of Data Processing	Data Subjects
Conducting processes of emergency management	Employee, relatives of the employee, foreign employee
Conducting processes of information security management	Employee, foreign employee, visitor
Conducting procedures for selection and placement of employee candidate / intern / student	Employee, employee candidate, reference, intern
Conducting procedures for application of employee candidates	Employee, employee candidate, reference
Conducting employee satisfaction and commitment processes	Employee
Fulfilment of obligations arising from the labour contract and legislation for employees	Employee, foreign employee
Conducting processes for fringe benefits and interests for employees	Employee, relatives of the employee, foreign employee
Conducting audit / ethics activities	Insured
Conducting disciplinary processes	Employee, foreign employee
Conducting training activities	Employee, instructor, foreign employee
Conducting access authorizations	Employee, intern, foreign employee
Conducting activities in compliance with legislation	Employee, client, foreign employee
Conducting financing and accounting affairs	Medical escort, client, insured, supplier executive
Ensuring safety of physical location	Employee, employee candidate, instructor, intern, supplier's employee, supplier executive, foreign employee, visitor
Conducting assignment processes	Supplier executive
Following-up and conducting legal affairs	Employee, foreign employee
Conducting communication activities	Employee candidate, brand client, medical escort, client, potential client, reference, insured, relatives of the insured, supplier executive
Planning human resources processes	Employee, intern, foreign employee
Conducting / supervising business activities	Employee, brand client, foreign employee
Conducting occupational health / safety	Employee, instructor, workplace physician, supplier's

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activities	Employee, supplier executive, foreign employee
Receiving and assessing suggestions for improvement of business processes	Brand client
Conducting logistics activities	Employee
Conducting processes of procurement of goods / services	Instructor, supplier executive
Conducting after-sales support services for goods/services	Medical escort, client, insured, relatives of the insured
Conducting goods / services sale processes	Client, supplier executive
Conducting goods / services production and operation processes	Brand client, medical escort, client
Conducting processes of customer relationship management	Employee, brand client
Conducting transfer procedures of the client	Client, insured, relative of the insured
Organization and event management	Employee, client
Conducting performance evaluation processes	Employee, brand client, foreign employee
Conducting advertisement / campaign / promotion processes	Brand client, client, potential client
Conducting contracting processes	Employee, brand executive, client, supplier's employee, supplier executive, foreign employee
Follow-up of requests / complaints	Employee, brand client, client, insured
Ensuring safety of movable goods and resources	Employee, foreign employee
Conducting wage policy	Employee, employee candidate, instructor, client, intern, foreign employee
Ensuring security of data controller operations	Employee, workplace physician
Informing authorized persons, institutions and organizations	Employee, client, foreign employee, visitor
Procedures for work and residence permits for foreign employees	Foreign employee

5.3. Methods and Legal Reasons for Collecting Personal Data

5.3.1. Data Collection Methods

Marm Assistance personal data collection methods are indicated below:

Data Categories	Method of Collection
Vehicle Information	E-mail, oral statement, written statement
Biometric data	Delivery by hand (biometric photo), pdks device
Conviction and security measures	Delivery by hand, written statement
Philosophical belief, religion, sect and other belief	Written statement
Financing	Delivery by hand, oral statement, written statement
Safety of physical location	Security camera
Audio-visual records	CRM Application, delivery by hand, photo and camera shooting, oral statement (voice records), applications
Legal transaction	Written statement

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Contact details	CRM Application, delivery by hand, log application, oral statement, written statement
Transaction security	Log application, written statement
Identity	CRM Application, delivery by hand, log application, oral statement, written statement, applications
Location	GPS, oral statement, mobile application
Professional Experience	Delivery by hand, oral statement, written statement
Client Transaction	Oral statement, written statement, application
Personal information	Delivery by hand, e-mail, oral statement, written statement
Health-Related Information	Delivery by hand, oral statement, written statement

5.3.2. Legal Reasons for Data Processing

Marm Assistance processes personal data because of legal obligations and for the purpose of serving our clients. The personal data are processed in accordance with the principles specified in Article 5 of GDPR and Article 4(2) of the Law. If the requirements in the Articles 5(2) and 6(3) of the Law are not met for data processing, it is mandatory to receive explicit consent. They are processed in line with the following conditions specified in Articles 5(2) and 6(3) of the Law, full text of which you can access at www.mevzuat.gov.tr;

5.3.2.1. 5(2) Reasons for Processing of Personal Data

- a) If expressly stipulated by the laws,
- b) If it is essential for the protection of life or physical integrity of the person or of any other person who is incapable of giving his consent due to factual impossibility or whose consent is not deemed legally valid.
- c) If it is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- d) If it is essential for the data controller to fulfil his legal obligation,
- e) If it is made public by the data subject himself,
- f) If data processing is essential for the establishment, use or protection of a right,
- g) If data processing is essential for legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

Related laws regarding stipulations by the laws are elaborated in "Personal Data Storage and Destruction Policy".

5.3.2.2. 6 (3) Reasons for Processing of Sensitive Personal Data

Provided that sufficient measures are taken; sensitive personal data excluding those relating to health and sexual life, may be transferred without seeking explicit consent of the data subject, if they are stipulated by the laws. Sensitive personal data relating to health and sexual life may be transferred without seeking explicit consent only for the purposes of;

- a) Protection of public health,
- b) Preventive medicine,

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- c) Medical diagnosis,
- d) Performance of treatment and caring services,
- e) Planning healthcare services and their financing.

Legal grounds used by Marm Assistance for processing of data are detailed in the document titled "Marm Assistance KVKK Data Inventory".

5.4. Ensuring the Security of Personal Data

Administrative and technical safeguards established for ensuring the security of personal data are elaborated in "Personal Data Storage and Destruction Policy".

5.5. Principles for Processing of Personal Data

Principles are established for processing of personal data in the Article 5 of GDPR and Article 4 (2) of the Law. Marm Assistance processes the personal data in accordance with the principles set forth.

Personal data are processed in compliance with the following principles;

- Lawfulness and conformity with rules of good faith,
- Accuracy and being up to date, where necessary,
- Being processed for specific, explicit and legitimate purposes,
- Being relevant with, limited to and proportionate to the purposes for which they are processed,
- Being retained for the period of time stipulated by relevant legislation or required for the purpose for which they are processed.

5.6. Destruction of Personal Data

Destruction of personal data collected by Marm Assistance is detailed in "Personal Data Storage and Destruction Policy".

5.7. Transfer of Personal Data to Persons at Home

Marm Assistance carefully follows the conditions, with regard to sharing of personal data with the third parties, stipulated by the Law, without prejudice to the provisions of other laws. In this context, personal data are not transferred to the third parties without explicit consent of the data subject. However, in the presence of any of the following conditions specified by the Law, personal data may also be transferred without seeking explicit consent of the data subject.

- If expressly stipulated by the laws,
- If it is essential for the protection of life or physical integrity of the person or of any other person who is incapable of giving his consent due to factual impossibility or whose consent is not deemed legally valid.
- If it is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- If it is essential for the data controller to fulfil his legal obligation,
- If it is made public by the data subject himself,
- If data processing is essential for the establishment, use or protection of a right,
- If data processing is essential for legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

Provided that sufficient measures are taken; sensitive personal data excluding those relating to health and sexual life, may be transferred without seeking explicit consent of the data subject, if they

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are stipulated by the laws. Sensitive personal data relating to health and sexual life may be transferred without seeking explicit consent only for the purposes of;

- Protection of public health,
- Preventive medicine,
- Medical diagnosis,
- Performance of treatment and caring services,
- Planning healthcare services and their financing.

With regard to transfer of sensitive personal data, conditions specified for processing of such data are also complied with.

5.8. Transfer of Personal Data to The Persons Abroad

Marm Assistance may share the names, surnames and voice records of its employees in line with the request of its contracted clients abroad.

Marm Assistance may share medical escort, insured client and brand client information with the clients abroad who are Data Controllers.

Marm Assistance may share the data of its direct clients with the airlines, agencies and other sub-suppliers, based on the service it receives.

5.9. Personal Data of the Visitors

5.9.1. Video Surveillance

The inside of the building is kept under video surveillance by Marm Assistance to ensure security. Within this context, our company acts in compliance with the Constitution, Law and other legislation. Videos of our visitors are recorded by means of the video surveillance system at the entrances of the building and facility and inside the facility of our company.

The video surveillance system is intended for ensuring the security of our company, employees, clients and visitors.

Only a limited number of staff have access to the recordings recorded and retained in digital media. Live camera footage can be watched by security staff only. A limited number of people who have access to the records declare that they will protect the confidentiality of the data they access through a confidentiality commitment.

In accordance with Provisions stated in GDPR and Article 12 of the Law, necessary administrative and technical measures are taken by our company for ensuring security of the personal data obtained through video surveillance.

5.9.2. Personal Data of Website Visitors and Personal Data Obtained for Internet Access Point Service

On the websites of our company; actions of our visitors in our website are recorded by technical means (e.g. cookies) in order for the visitors to perform their visits in accordance with the intended purpose of their visits.

Our company offers free internet service to all our visitors. Identification information and internet log records of the service provided are collected and stored pursuant to the Law No 5651 (on Regulation of the Publications on the Internet and Combating Crimes Committed by Means of Such Publication). Processed personal data are stored for 2 years pursuant to the Law No 5651.

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5.10. Rights of the Personal Data Subject

The following rights of the data subject arising from the Law are listed in related Articles of GDPR and Article 11 of the Law and accordingly as the data subject you are entitled to:

- Know if your personal data are processed,
- If processed, request information thereof,
- Know the purpose of processing of your personal data and if such data are used in accordance with the intended purpose,
- Know the third parties at home or abroad to whom your personal data are transferred,
- Request rectification of your personal data, if such data are processed incompletely or inaccurately,
- Request erasure or destruction of your personal data,
- Request notification, to the third parties to whom your personal data are transferred, of the operations, if any, of rectification, erasure or destruction of your personal data,
- Object to any unfavourable consequences arising as a result of analysis, exclusively by means of automatic systems, of your processed data,
- Claim for indemnification in case you incur any damages due to unlawful processing of your personal data.

5.11. Application Methods

The Concerned Person may exercise his/her rights regarding his/her personal data within the scope of the Law No 6698 in the following ways;

Applications for personal data should be made by filling out the document titled **Personal Data Application Form**.

Data Controller Identity: Marm Assistance Destek Hizmetleri A.Ş.

The methods for application for information are as follows;

By hand: Harmandere Mah. Ankara Cad. AirPort Plaza No: 486, 34912 Pendik/ İstanbul

E-mail : marm@hs03.kep.tr

Cargo : Harmandere Mah. Ankara Cad. AirPort Plaza No: 486, 34912 Pendik/ İstanbul

Applications through delivery by hand should be made by the personal data subject. The personal data subject should submit his/her identity card. If the application is submitted by any persons other than the Personal Data Subject, the application should be made with a notary certified power of attorney.

If the Application Form certified by notary is sent by mail, it should be sent as registered mail with return receipt for determining the commencement date of the legal period.

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