

**Codeway Dijital Hizmetler A.Ş.
Privacy Notice for Employee Candidate**

Personal Data Protection Law numbered 6698 (**Law**) entered into force on 7 April 2016. Law covers regulations on processing any kind of data regarding identified or identifiable natural persons.

This document includes Codeway Dijital Hizmetler A.Ş.'s (**Codeway** or **Company**) statements and explanations regarding the processing of personal data of Employee Candidates, who made an application to Codeway by Codeway within the scope of Law. As such, the scope of this text is Codeway's processes for Employee Candidates' personal data processing. Please read carefully this Privacy Notice for Employee Candidate (**Privacy Notice**) and review provisions with regard to personal data processed by Codeway throughout the such procedure. As per Law, your personal data might be processed by Codeway with being the data controller, within the scope mentioned below.

Terms used herein shall have the following meanings:

Employee Candidate(s): Candidates that made a job application to be an employee in Codeway's official records;

Data subject: Natural person whose personal data are processed;

Personal Data: Any information relating to an identified or identifiable natural person;

Processing of Personal Data: Any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system; and

Data Controller: Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for the establishment and management of the filing system.

1. Data Subject, Data Categories and Data Types

Employee Candidate	Identity	Name-surname, nationality, date of birth, age, gender (identification information on the CV)
	Contact	Communication channel, e-mail address, telephone/ phone number, address, LinkedIn profile and information on social media platforms
	P e r s o n n e l Information	Military service, driving licence information
	Information on Professional Experience	Information contained in CV, information on education, foreign language, position, computer skills, work experience, course/seminar/certificate/award and certificate of excellence, reference information, professional background
	Visual and Audial Records	Photograph if it is shared with CV

	Other: Interview Assessment	Interview date, interview result, information on whether an e-mail was sent to the employee candidate, salary expectation, notes on the interview
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2. Personal Data Collection Methods and Legal Causes

Employee Candidate's Personal Data are collected from different channels through the job application process. Company collects Employee Candidate's Personal Data by way of automatic and non-automatic methods, in the physical or electronic medium, via

- E-mail sent to Company or submitting CV to Company's website,
- Employee Candidate's CV submission to the Company via LinkedIn or Kariyer.net,
- Interviews, question sheets, tests, and forms in written or verbal from the Data Subject himself/herself.

Company collects Personal Data - which are obtained during application and interview via communication channels, such as e-mail, website, electronically, aurally, or in written - in accordance with conditions for the processing of personal data stipulated in Law proportionate with purposes written in the section titled "Purposes for the Personal Data Processing" especially for (i) reviewing Employee Candidate's appropriateness for the position, (ii) conducting candidate selection and positioning processes, (iii) hiring candidates, (iv) planning human resources processes, (v) providing right and benefits to Employee Candidate, (vi) conducting and developing internal activities, in accordance with below mentioned legal causes which are stipulated in Article 5 and 6 of Law:

E m p l o y e e Candidate	
Identity	<ul style="list-style-type: none"> • In situations where it is necessary to process the data subjects' personal data, in order to build a contractual relationship or processing is directly related to the execution or performance of the agreement • Processing is necessary for Codeway's legitimate interests, provided that the fundamental rights and freedoms of data subjects are not harmed
Contact	
P e r s o n n e l Information	
Information on Professional Experience	
Visual and Audial Records	
Other: Interview Assessment	

3. Purposes for Personal Data Processing

Your above-mentioned Personal Data shall be processed with the purposes subject to your statement to Company and mentioned below; in compliance with the conditions and principles stated in article 4 of the Law, which are (a) lawfulness and conformity to the principle of good faith, (b) being accurate and kept up to date where necessary, (c) being processed for specified, explicit and legitimate purposes, (d) being relevant, limited and proportionate to the purposes for which they are processed and (e) being stored for the period laid down by relevant legislation or the period required for the purpose of data

processing; and in compliance with the conditions of Personal Data processing stipulated under Article 5 and 6 of Law.

In accordance with these limits, Employee Candidate's - whose made an application or whose application was sent to Company - Personal Data for the following purposes in compliance with the general conditions specified above:

Employee Candidate	
Identity	<ul style="list-style-type: none"> • Conducting Employee Candidate/intern/student selection and position processes • Conducting Employee Candidate's application processes • Conducting activities in accordance with legislation • Planning human resources processes • Conducting/supervising business activities • Conducting retention and archive activities • Conducting talent / career development activities
Contact	
Personnel Information	
Information on Professional Experience	
Visual and Audial Records	
Other: Interview Evaluation	

4. To Whom and With What Purposes the Processed Data Is Transferred

Personal Data, collected, can be transferred to domestic and abroad suppliers limited in accordance with achieving the objectives stated in the section titled "Purposes for the Personal Data Processing" and the fulfillment of these purposes and limited to the personal data processing conditions specified in Articles 8 and 9 of the Law and above-mentioned purposes.

In detail, for what purposes your Personal Data can be shared, are as follows:

Data Subject Group	Purpose of Transfer
Employee Candidate	<ul style="list-style-type: none"> • Conducting Employee Candidate/intern/student selection and position processes • Conducting Employee Candidate's application processes • Planning human resources processes • Conducting retention and archive activities • Conducting talent / career development activities

5. Data Subjects' Rights under Article 11 of Law

Pursuant to the Law, data subjects have the following rights:

- to learn whether their personal data is processed or not,
- to request information if personal data is processed,
- to learn the purpose of the processing of personal data and whether this information is used within the intended purpose
- to know the third parties to whom the personal data is transferred in domestic or abroad

- to request the rectification of the incomplete or inaccurate data, if any, and to request notifying the third parties to whom the personal data has been transferred regarding the operations within this scope,
- although it is processed in compliance with the provisions of Law and other related legislation, to request the erasure or destruction of the personal data under the conditions in the Law, in case the reasons required to process have ceased,
- to request notifying third parties whom your personal information has been transferred to regarding the operations within this scope
- to object to the processing, exclusively by automatic systems, of the personal information, which leads to an unfavourable consequence for the person, and
- to request compensation for the damage arising from the unlawful processing of your personal information.

In order to exercise your rights regarding Personal Data and state your requests regarding your rights, as being Data Subject, you may perform actions such as required changes, update and/or deletion and submit relevant request to Company by filling Data Subject Application Form reached from Company's website and using mentioned methods of the Data Subject Application Form, sending to Company's address "Esentepe Mahallesi Büyükdere Cad. Ferko Apt. No: 175/141 Şişli/İstanbul physically in writing, by signing with the secure electronic signature or mobile signature defined to you, by sending an e-mail to hello@codeway.co, which is the registered e-mail address of Company via your registered e-mail address, or by sending an e-mail to hello@codeway.co by using your e-mail address previously notified to Company and registered in Company's systems.

It is required for the application - which is made for you as being Data Subject and exercise abovementioned rights and which consists your explanations regarding the right that you would like to exercise – to have followings, the requested issue should be clear and explicit; the requested issue should be about yourself or you should be specially authorized and your authority should be certified in cases where you make such on someone's behalf, must fulfil the minimum application conditions stipulated in the Communiqué on the Procedures and Principles of Application to the Data Controller. Pursuant to paragraph 1 of Article 13 of the Law, you can make your request regarding the exercise of your above-mentioned rights with the following information based on the "Communiqué on Application Procedures and Principles to the Data Controller":

- Applicant's name and surname,
- For Turkish Citizens, TR Identity Number; for foreigners, nationality and passport number or identity number if available,
- Residential address or workplace address of applicant to notification,
- The applicant's e-mail address, telephone or fax number to notification,
- Subject of demand,
- Information and documents regarding the subject of the request,
- Requisition methods and
- Signature if the request is made in writing.

Once you submit your request by one of the underlying methods, Company will finalize your request as soon as possible and at latest within thirty days based on qualitative of your request. However, in cases where you request requires additional cost, Codeway may charge you a fee based on the tariff which is determined by Personal Data Protection Authority.

I hereby declare that I read thoroughly and completely understand the Codeway Privacy Notice for Employee Candidate.