



GÜZELDERE ♦ BALKAN
LAW FIRM

Telephone : +90 (212) 244 84 94
Facsimile : +90 (212) 244 85 95
Address : İnönü Cad. Dilaram Apt.
No: 19/9-11 Taksim 34437 İstanbul
E-Mail : info@guzeldere-law.com
Web : www.guzeldere-law.com

PRIVACY POLICY

1. INTRODUCTION

Güzeldere Balkan Law Firm (“**Law Firm**”) cares about the privacy of your personal data. In this scope, this Privacy Policy (“**Policy**”) describes how and for what purposes the personal data of the following persons is collected, processed and shared with third parties by the Law Firm:

- Natural person clients/prospective clients and the contact persons of the corporate clients/prospective clients;
- Individuals applying for job positions or contacting with us;
- Natural person suppliers or the contact persons of the corporate suppliers which provides goods or services to the Law Firm;
- Any other individuals about whom the Law Firm obtains personal data.

“**Personal Data**” is defined as any information that relates to an identified or identifiable natural person as per the Turkish Law on the Protection of Personal Data numbered 6698 (“**Law**”). In this Policy, it refers to the personal data processed by the Law Firm that acts as a data controller.

The Law Firm acts as a data controller in relation to recruitment processes, performance of legal services, sending informational messages and other limited circumstances.

In this regard, as per the Law and the relevant legislation, the information indicated in the Policy shall be applicable to the personal data processed by the Law Firm that acts as the data controller. Processing activities carried out further to clients’ instructions and/or requests as a data processor fall outside the scope of this Policy. Necessary notifications regarding such processing activities should be made by the relevant clients acting as data controllers.

2. THE DATA CONTROLLER’S IDENTITY

The Data Controllers are; **Altuğ Güzeldere** and **Erdem Balkan**, residing at the address of İnönü Cad. No:19 / 9-11 Dilaram Apt. Gümüşsuyu Taksim / İstanbul.



3. PERSONAL DATA COLLECTED BY THE DATA CONTROLLERS

All Personal Data shall be processed in accordance with the following principles:

- Lawfully and fairly,
- Accurately and by keeping up to date where necessary,
- For specified, explicit and legitimate purposes,
- Adequately, relevant and limited to what is necessary in relation to the processing purposes as mentioned herein,
- By keeping within the scope of the relative legislation or under necessary conditions of data processing and aims for the purposes of processing.

THE CATEGORY AND CONTENT OF THE COLLECTED PERSONAL DATA

Identity Data	name surname, photograph, Turkish ID number, passport number, nationality, name of the parents, sex, place and date of birth, marital status.
Contact Data	residence address, office address, home, office and mobile telephone number, e-mail address, fax number, registered e-mail address (KEP).
Financial Data	invoice details, payment history, bank account information, commercial and legal payment obligations.
Data Concerning Legal Transactions	information concerning the determination of legal receivables and rights, information concerning the pursuance of legal receivables and rights along with the execution of obligations and statutory liabilities, file and debt/payables information regarding execution proceedings, information concerning case files, all types of legal proceeding information.
Data Concerning Work Experience	diploma information, courses, vocational trainings, certificates, transcripts.
Special Categories of Personal Data	religious belief information and blood type (due to former Turkish ID card), information concerning criminal conviction, biometric photo.

Special Categories of Personal Data shall be processed in limited cases depending on the explicit consent of the data subject and to the extent where it is necessary for the



services provided by the Law Firm or mandatory for fulfilling the Law Firm's obligations provided that such information is not within the scope of the exception specified in paragraph 3 of Article 6 of the Law. In cases where explicit consent is required, the data subject may always withdraw their consent according to Article 7 of the Law.

Within the scope of this Policy, Personal Data other than Special Categories of Personal Data shall be processed as per sections (a), (c), (ç), (e), (f) of paragraph 2 of Article 5 of the Law and processing of such Personal Data shall not be subject to the explicit consent.

4. METHODS FOR COLLECTING OF PERSONAL DATA

The above-mentioned Personal Data are collected in physical or electronic platforms directly from the clients, suppliers, persons applying the job, public institutions and organizations and public sources depending on the manner in which they are shared with the Law Firm and processed and transferred within the scope of the purposes mentioned below. Automatic data processing systems are not used.

5. THE PURPOSES OF AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

The purposes for which the Law Firm collects and processes the Personal Data and the legal grounds for such processing are as follows:

- In order to fulfill the Law Firm's obligations required by attorney agreements, the Attorneyship Law numbered 1136 ("**Attorneyship Law**") and relevant legislation; the Identity Data, the Contact Data, the Data Concerning Legal Transactions and in limited circumstances, the Special Categories of Personal Data, are processed for the purposes of proposing offers to potential clients, executing attorney agreements with clients, and providing any kind of litigation and consultancy service to clients.
- In order to perform financial transaction arising from the services and fulfill tax obligations in relation to the services; the Identity Data, the Contact Data and the Financial Data are processed for the purposes of carrying out the accounting activities.
- In order to provide any kind of information on legal developments and updates, the Contact Data is processed for the purposes of improving the services provided to the clients and informing clients.
- In order to fulfill the Law Firm's mandatory obligations for archiving and sharing information with the competent authorities; the Identity Data, the Contact Data, the Data Concerning Legal Transactions, the Financial Data and in limited



circumstances, the Special Categories of Personal Data are processed for the purposes of carrying out the compliance procedures fully.

- In order to prevent data loss, the Personal Data is processed for the purposes of backing up and copying and carrying out the technical and physical security processes.
- In order to fulfill the obligations within the scope of the agreements made with the suppliers; the Identity Data, the Contact Data and the Financial Data are processed for the purposes performing finance and taxing transactions.
- In order to manage recruitment processes in accordance with the legislation; the Identity Data, the Contact Data and the Data Concerning Work Experience are processed for the purposes of carrying out such processes in alignment with the Law Firm's own procedures.

The Personal Data are processed in compliance with Articles 5 and 6 of the Law provided that such processing shall not violate fundamental rights and freedoms of the data subjects; to the extent such processing is necessary to protect legitimate interests, or where data subjects made their data public.

6. RETENTION PERIOD

The Personal Data processed by the Law Firm shall be kept for the periods which the purposes of processing require, specified in the applicable legislation. In case the reasons for the Personal Data processing no longer exist, the Personal Data shall be deleted, destructed or anonymized ex officio or upon the request of the data subject without prejudice to the cases where it is legally mandatory to retain data.

7. TRANSFER OF PERSONAL DATA

By virtue of confidentiality obligation, the Personal Data provided to the Law Firm are not disclosed or transferred to persons other than the attorneys and employees working at the Law Firm and third parties whom the data requires to be shared in order to perform and pursue the Law Firm's duties. However, within the scope of above-mentioned legal reasons and purposes of data processing as well as Article 8 of the Law;

- The Personal Data may be transferred to public institutions and organizations such as courts and enforcement offices, public notaries, land offices, tax offices along with the competent authorities and third parties that are entitled to request information as per laws and regulations, in order to provide all kinds of legal litigation and consultancy services under the Attorneyship Law.



- The Personal Data may be shared with the banks notified by the clients to the Law Firm in order to transfer the collected amounts on behalf of the clients in terms of proxy relationship.
- The Personal Data may be transferred to the persons providing financing and accounting services to the Law Firm in order to fulfill its tax obligations.
- The Personal Data may be transferred to the suppliers and service providers who provide IT services to the Law Firm in order to provide to copy and back up data services for preventing data loss and to carrying out systemic security processes. The said persons are obligated to provide an adequate standard of security for the Personal Data and to use and process them only on the Law Firm's behalf as per the provisions of the agreement executed with the Law Firm.

In addition, the servers that the Law Firm uses for communication on electronic platform are located outside of Turkey. Therefore, when you provide personal data by contacting the Law Firm directly via e-mail, you transfer your personal data abroad. If you do not wish to contact us via e-mail, you may contact us by calling our office number and share the Personal Data with us through the ways deemed appropriate by you.

The Law Firm takes the all necessary administrative and technical measures to ensure the confidentiality and security of the Personal Data specified in this Policy and no more data will be transferred than is required.

The Special Categories of Personal Data may be transferred upon the explicit consent of the data subject provided that such information is not within the scope of the exception specified in paragraph 3 of Article 6 of the Law. In cases where explicit consent is required, data subject may withdraw their consent according to Article 7 of the Law. The transfer of the Personal Data other than Special Categories of Personal Data within the scope of this Policy is not subject to explicit consent as per section (a) of paragraph 2 of Article 8 of the Law.

8. INFORMATION MESSAGES

When the Personal Data is processed by the Law Firm for the purposes of sending information messages, you may have a right to control regarding the process of the Personal Data. If you no longer wish to receive any such messages, you may opt-out and prefer to not to receive them by contacting the Law Firm as it is stated in the mentioned information messages.



9. THE RIGHTS OF THE DATA SUBJECT

As per Article 20 of the Constitution of the Republic of Turkey, everyone has the right to be informed on the personal data concerning themselves. Furthermore, within the scope of Article 11 of the Law, data subjects have a right to:

- Learn whether their personal data has been processed,
- Request information if their personal data has been processed,
- Learn the purposes of such processing of personal data and whether processed data is being used in accordance with these purposes,
- Learn the third persons to whom their personal data has been transferred within or outside the country,
- Request correction in case the processing of their personal data is incomplete or inaccurate,
- Pursuant to the Article 7 of the Law, request the erasure or destruction of their personal data and request notifying to them to whom the personal data is transferred,
- Object to negative consequences about their that is concluded as a result of analysis of the processed personal data exclusively by automatic means,
- Request claim indemnification if they suffered damages due to illegal processing of your personal data.

Data subjects may send a mail to **Gümüşsuyu Mah. İnönü Cad. No: 19/9-11, 34437 Beyoğlu/İstanbul** or an e-mail to **info@guzeldere-law.com** (via their e-mail address previously notified to the Law Firm, or registered e-mail address) to exercise the above-mentioned rights. If the conducting of the requests needs any additional costs, such costs will be reflected to the applicants by the Law Firm subject to the price list determined by the Turkish Personal Data Protection Authority (“**Authority**”). The explanations of the data subject in the application form regarding their request for exercising the above-mentioned rights should be clear and comprehensible.

In case the application is made by the data subject directly, the application should contain their name, surname, Turkish ID number (passport number for foreigners), address (so that our response can be conveyed) and documents evidencing the identity.

In case the application is made by a third party who acts on behalf of the data subject, such person should be specifically authorized on this matter and should submit a document as a proof of representing their authority. In this case, the application should contain the names, surnames, Turkish ID numbers (passport numbers for foreign persons), addresses (so that our response can be conveyed) of both the applicant and the data subject and documents evidencing their identities.



Moreover, data subjects may send a request to exercise their right to complaint before the Authority with the contact information below:

Address : Nasuh Akar Mah. Ziyabey Cad. 1407. Sok. No: 4 06520 Balgat-
Çankaya / Ankara
Phone Number : +90312-216-5000
Website : <http://www.kvkk.gov.tr/>

Last Update: July 2021