

# CLARIFICATION TEXT FOR SUPPLIER EMPLOYEES OF WATERNET WITHIN THE SCOPE OF PDP LAW

According to the Personal Data Protection Law, which came into effect in April 2016, we inform you that:

- Your personal data belonging to employees, obtained in the ways specified below, within the scope of our commercial relationships or our business relationship with your employees, is processed;
- In a manner connected, limited, and proportional to the purpose,
- Maintaining the accuracy and most up-to-date status of the personal data as you have provided or as it has been provided to us,
- Can be recorded, stored, preserved, rearranged, shared with institutions authorized to request such personal data under the law, following the conditions prescribed by the PDP Law, both domestically and internationally, classified, and processed in other ways specified in the PDP Law.

#### RELATED TO SUPPLIER EMPLOYEE DATA

The Company collects and processes personal data from supplier employees or representatives verbally, physically, or electronically. The personal data collected and processed and how they are collected are specified below.

The Company can collect personal data directly from data subjects verbally or through electronic means and process this personal data. You can access the table below to see which personal data is collected and processed and how they are collected.

# WHY DO WE COLLECT YOUR PERSONAL DATA?

These data may be obtained from you for the following reasons:

- Waternet may need to collect your personal data to carry out legal processes.
   Failure to provide this personal data may violate our obligation to ensure security within the scope of the Labor Law and relevant legislation. It may pose a risk of not benefiting from your rights.
- Waternet may need to collect your Personal data to fulfill its legal obligations
  within the framework of the relevant legislation. Failure by Waternet to fulfill its
  legal obligations may expose it to sanctions and may prevent your legal
  obligations from being fulfilled through Waternet.
- Waternet may need to collect your personal data to perform the contract between you and Waternet. The inability to share the personal data obtained here may prevent the healthy conduct of your business relationship with Waternet, the fulfillment of some processes established in your favor by Waternet, or the difficulty of fulfilling them from your perspective.
- Waternet may collect your personal data to always prioritize its legitimate interests. Since the purposes of collecting your personal data are the same as the processing purposes of Waternet, these legitimate interests are explained



under the "Especially for ensuring the legitimate interests of the Company" clause below "Processing Purposes of Your Personal Data."

**Identity Information:** Name-surname, ID photocopy, driver's license photocopy,

**Contact Information:** Contact numbers, address information, phone number

**Education Information:** Educational status, certificate of courses and seminars

attended, foreign language proficiency, training received

during working life, and performance information

**Financial Information:** Financial and salary details, insurance premium payment

information, bank information

**Sensitive Personal** 

Data:

Criminal record, periodic medical examination form for employment, psycho-technical document (report), religious information in the identity card, blood type in the driver's

license document

Visual Data: Closed-circuit security camera images, photograph in the

identity card or Turkish ID Card and driver's license

Others: Employment contracts, signature, working hours, license

photocopy, SRC2 document (Driver professional

qualification), OHS training certificate, SGK entry form at

the supplier company

### PURPOSES OF PROCESSING SUPPLIER EMPLOYEE DATA

Your personal data may be processed by Waternet A.Ş. for the following purposes, among others, but not limited to these purposes, and legal reasons.

- Occupational health and safety,
- Keeping financial and accounting records,
- Fulfillment of legal obligations,
- Security inspection and auditing,
- Creation of allegations and complaints about crimes requiring punishment,
- Conducting information security audits and ensuring confidentiality,
- Providing and organizing training.

Your personal data will be kept for the maximum period specified in the relevant legislation or for the period necessary for the purpose for which they are processed, and in any case, until the statutory limitation periods expire.



#### SHARING OF YOUR PERSONAL DATA WITH THIRD PARTIES

In accordance with Articles 5 and 6 of the PDP Law, in order to fulfill our legal obligations, your personal data are shared with all relevant public institutions and organizations, especially the Occupational Health and Safety Unit, the Ministry of Labor and Social Security, lawyers providing legal services to Waternet, the Social Security Institution, the Turkish Employment Agency, Law Enforcement Forces, and the Turkish Republic Courts.

#### YOUR RIGHTS UNDER ARTICLE 11 OF THE PDP LAW

According to Article 11 of the PDP Law, you have the right to:

- Learn whether your personal data is being processed by the Company and, if so, request information about it,
- Learn whether your personal data has been transferred domestically or internationally and to whom it has been transferred,
- Learn the purpose of processing your personal data and whether they are used for their intended purpose.

Furthermore, you have the right to request correction of your incorrect or incomplete personal data and to request notification of the recipients to whom your data have been transferred or may have been transferred. You may request the deletion and destruction of your data from the Company within the framework of the conditions stipulated in Article 7 of the PDP Law. At the same time, you may request that the third parties to whom the data have been transferred or may be transferred be informed about the deletion and destruction of the data. If the results of your personal data analysis, which have been created using an automated system, are contrary to your interests, you may object. If you suffer damage due to the unlawful processing of your personal data, you may request compensation for the damage.

Your requests in your application will be concluded within thirty days at the latest, free of charge, depending on the nature of the request. However, if the process requires an additional cost for the Company, a fee may be charged according to the tariff determined by the Personal Data Protection Board.

You must fill out the application form on the Company's website ( <a href="https://www.waternet.com.tr/en/kvkk">https://www.waternet.com.tr/en/kvkk</a> ) and submit it to the Company as stated in the form.

# **Exceptions to the Right to Apply**

According to Article 28 of the PDP Law, personal data owners will not be able to claim their rights in the following cases:

- Processing personal data for research, planning, and statistical purposes by anonymizing them through official statistics
- Processing personal data for art, history, literature, or scientific purposes or within the



scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy, or personal rights or does not constitute a crime

- Processing personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized and authorized by law to ensure national defense, national security, public security, public order, or economic security
- Processing personal data by judicial authorities or enforcement authorities for investigation, prosecution, trial, or execution processes

Following the Article 28/2 of the PDP Law; except for requesting compensation for damages in the cases listed below, personal data owners will not be able to claim their rights.

- Processing personal data for preventing the commission of crimes or for conducting a criminal investigation
- Processing personal data that has been made public by the data subject
- Processing personal data by authorized and authorized public institutions and organizations or public professional organizations in the fields of supervision or regulation or for disciplinary investigation and prosecution purposes
- Processing personal data to protect the economic and financial interests of the state regarding budget, tax, and financial matters

# **CONTACT INFORMATION**

WATERNET Water Services Inc. Mersis No: 0-8000-5148-00000017

Contact Link: https://www.waternet.com.tr/iletisim

Address: Flatofis Otakçılar Street No:78 Floor:2 34050 Eyüp İstanbul Turkey

Email: KVKK@waternet.com.tr

Kep address: waternet.PDP@hs02.kep.tr

Telephone: 0850 250 22 22 Fax: 0212 467 48 15