

PERSONAL DATA PROTECTION AND PROCESSING POLICY

Eczacıbaşı Spor Kulübü Derneđi

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A. ABOUT OUR 'KULÜP' AND OUR POLICY

Eczacıbaşı Spor Kulübü Derneği ("Eczacıbaşı Spor Kulübü" or "Kulüp") attaches great importance to the protection of personal data. As the Kulüp, within the framework of our obligations in line with the Personal Data Protection Law No:6698 ("Law")¹ and the secondary regulations prepared based on the Law and the decisions of the Personal Data Protection Board ("Board"), we consider it as our priority to carry out all our personal data processing activities in accordance with the legislation and to provide appropriate protection for the personal data we obtain.

With this Policy, which has been prepared as a guide for the processing of personal data, we want to guarantee that all data processing activities carried out within our Kulüp comply with the Law and the relevant legislation. In this context, we share this Policy with the employees of our Club.

B. PURPOSE AND SCOPE OF THE POLICY

With the Personal Data Protection And Processing Policy ("**Policy**"), we aim to inform our athletes, relatives of athletes, prospective athletes, technical staff, officials and employees of our business partners, whose personal data we process, in the most appropriate and accurate manner about how their personal data is processed by our Kulüp.

This Policy applies to all personal data processing activities managed by Eczacıbaşı Spor Kulübü in relation to the processing and protection of personal data. This Policy we have prepared is published on the website of our Kulüp. The content of the Policy includes our obligations under the Law and the procedures and principles that we are required to comply with within the scope of the relevant legislation.

We include our processes regarding the processing of personal data of our employees in the Policy on the Protection and Processing of Employee Personal Data and inform our

¹ *Resmî Gazete Tarihi: 07.04.2016 Resmî Gazete Sayısı: 29677.*

employees with a separate policy that we have specially prepared by taking into account the employee processes.

C. DEFINITIONS IN THE POLICY

The definitions and their explanations in the Policy are set out below:

a.Explicit Consent: freely given, specific and informed consent.

b.Employee: Eczacıbaşı Spor Kulübü Derneği's employee.

c.Data Subject: The natural person, whose personal data are processed.

d.Officials and Employees of Our Business Partners: Natural persons working in third party companies (business partners, vendors, suppliers, but not limited to these) with which our Kulüp has any kind of business relationship, including the shareholders and officials of these companies.

e. Recording Medium: Any medium in which personal data processed by fully or partially automatic means or by non-automatic means provided that it is part of any data filing system.

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

g.Processing of Personal Data: any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.

h.Board: The Personal Data Protection Board.

i.Authority: The Personal Data Protection Authority.

jAutomatic Data Processing: Processing activity that is performed by devices with processors such as computers, telephones, watches, etc., spontaneously without human intervention within the scope of algorithms prepared in advance through software or hardware features.

k.Special categories of personal data: Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance,

membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data.

l.Athlete: A person who is active in sports and sportsmanship within the youth team, A team, sports school of our Kulüp and any sports-related formation carried out by our Kulüp, including but not limited to.

m.Data Filing System: The system where personal data are processed by being structured according to specific criteria.

n.Data Processor: The natural or legal person who processes personal data on behalf of the data controller upon its authorization.

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

D. GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING

Article 4 of the Law includes the general principles of personal data processing. Our Kulüp acts in accordance with the data processing principles listed in the Law when processing personal data.

The relevant data processing principles are given under the headings below:

1. Lawfulness and fairness

Our Kulüp acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. In this context, our Kulüp takes into account the proportionality requirements in the processing of personal data and does not use personal data for purposes other than the purpose of processing.

2. Being accurate and kept up to date where necessary.

Our Kulüp prioritizes the fundamental rights and freedoms of personal data subjects. Our Kulüp also ensures that the personal data it processes is accurate and up-to-date, taking into account the legitimate interests of our Kulüp in a way that does not harm the rights and

freedoms of data subjects. It takes all necessary measures to ensure that personal data is accurate and up-to-date when necessary.

3. Being processed for specified, explicit and legitimate purposes.

Our Kulüp clearly and precisely determines the purposes of processing personal data in a legitimate and lawful manner. Our Kulüp processes personal data in connection with and to the extent necessary for the services it provides. Personal data is not subject to any processing activity other than the purpose of processing by our Kulüp. Prior to each data processing activity, our Kulüp informs the data subjects within the framework of the rules specified in Article 10 of the Law and the Communiqué On Principles And Procedures To Be Followed In Fullfillment Of The Obligation To Inform² and clearly reveals the purposes of processing their personal data.

4. Being relevant, limited and proportionate to the purposes for which they are processed.

Our Kulüp processes personal data in a manner that is conducive to the realization of the specified purposes and does not process personal data that is not related to the realization of the purpose or is not needed. At the beginning of the personal data processing activity, it determines the personal data needed for the realization of the purpose and does not collect the data that is not needed at all.

5. Being stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed.

Our Kulüp retains personal data only for the period specified in the relevant legislation or for the period required for the purpose for which they are processed. In this context, our Kulüp first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, if a period is determined, it acts in accordance with this period, and if no period is determined, it keeps personal data for the period required for the purpose for which they are processed. In the event that the period expires or the reasons requiring processing disappear, personal data are deleted, destroyed or anonymized by our Kulüp in

² *Resmî Gazete Tarihi: 28.10.2017 Resmî Gazete Sayısı: 30224*

accordance with the Law and the By-Law on Erasure, Destruction or Anonymization of Personal Data³.

In this context, while carrying out personal data processing activities, our Kulüp observes these principles in all processes where personal data is processed. Necessary management and audit mechanisms have been established within our Kulüp in order to ensure compliance with the data processing principles specified in the Law.

E. CONDITIONS FOR PROCESSING PERSONAL DATA

1. Processing of Personal Data

Articles 5 and 6 of the Law include the conditions for processing personal data. These processing conditions express the legal reason for the personal data processing activity. Our Kulüp acts in accordance with these data processing conditions when processing personal data. While fulfilling the obligation to inform, our Club clearly states which data processing condition/legal reason the personal data is based on and ensures that data subjects are informed about the legality of our data processing activity.

The data processing conditions included in Article 5 of the Law and on which our Kulüp relies when processing personal data are as follows:

- Explicit consent of the data subject.
- Expressly provided for by the laws.
- Necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.
- Data processing is necessary for the establishment, exercise or protection of any right.
- Necessary for compliance with a legal obligation to which the data controller is subject.

³ Resmî Gazete Tarihi: 28.10.2017 Resmî Gazete Sayısı: 30224

- Personal data have been made public by the data subject himself/herself.
- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Among the personal data processing conditions listed above, the condition of "explicit consent of the data subject" is only relied upon if one of the data processing conditions in other articles is not present. For example, if the processing of personal data is based on the data processing condition that "it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract", our Club does not rely on the explicit consent of the data subjects to process the personal data in question.

2. Processing of Special Categories of Personal Data

While Article 5 of the Law regulates the conditions for processing personal data, Article 6 of the Law regulates the conditions for processing special categories of personal data. It is clearly stated in the Law which special categories of personal data are. Due to the sensitivity of such data, the data processing conditions also differ from personal data.

The data processing conditions in Article 6 of the Law and the data processing conditions that our Kulüp relies on when processing special categories of personal data are as follows:

- **Personal data, except for data concerning health and sexual life** As a rule, it is processed with the explicit consent of the data subject. However, in cases explicitly stipulated in the law, it can also be processed without the explicit consent of the data subject. If there is no such legal stipulation, it is asked whether the data subject has explicit consent in order to process the personal data in question.
- **Personal data relating to health and sexual life**, As a rule, data may be processed by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing. If it will be processed

by persons who do not have a confidentiality obligation within the listed purposes, the explicit consent of the data subject is required. If a data processing activity mentioned above is not carried out, it is asked whether the data subject's explicit consent is required for the processing of special categories of personal data.

F. TRANSFER OF PERSONAL DATA

1. Domestic Transfer

Our Kulüp may transfer the personal data it obtains to third parties in line with the above-mentioned personal data processing purposes. The data transfers carried out by our Kulüp differ according to each personal data processing activity. Within the scope of the obligation to disclose, our Kulüp explains to the data subjects which third parties the personal data will be transferred to within the scope of each personal data processing activity in accordance with the disclosure texts.

When transferring personal data to third parties, our Kulüp attaches great importance to compliance with the rules in Articles 8 and 9 of the Law and additional regulations determined by the Board. Our Kulüp acts in accordance with the rules in the Law and all relevant regulations. In the processes of transferring personal data, it transfers personal data by taking the necessary security measures appropriate to the nature of the personal data.

Personal data obtained by our Kulüp may be transferred to third parties in cases where the transfer of personal data is necessary to fulfill the purpose of data processing, provided that the following data processing conditions are met (see Title E / Section 1):

- Explicit consent of the data subject.
- Expressly provided for by the laws.
- Necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.

- Data processing is necessary for the establishment, exercise or protection of any right.
- Necessary for compliance with a legal obligation to which the data controller is subject.
- Personal data have been made public by the data subject himself/herself.
- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Among the transfer conditions listed above, the condition of "explicit consent of the data subject" is only relied upon if one of the transfer conditions in the other articles is not present. If one of the conditions other than the explicit consent of the data subject is present, the transfer is made on the basis of one of these conditions. If none of the other transfer conditions can be relied upon for the transfer in question, then the explicit consent of the data subject is applied.

For the transfer of special categories of personal data, it is taken into account whether one of the transfer conditions specific to special categories of personal data is present (see Title E/Section 2). If one of the conditions for the transfer of special categories of personal data is present, then special categories of personal data may be transferred taking into account the transfer condition in question. Otherwise, the explicit consent of the data subject is applied for the transfer.

2. Abroad Transfer

Article 9 of the Law sets forth certain rules for the transfer of personal data abroad. For the transfer of personal data abroad, it is necessary to act in accordance with the rules in this article. Our Club acts in accordance with the rules set out in Article 9 of the Law when transferring personal data abroad.

Our Kulüp first takes the necessary administrative and technical measures in accordance with the nature of the personal data before transferring personal data abroad. In this direction, necessary measures are taken specifically for the vehicle through which the transfer will be made, especially in the transfer of special categories of personal data in the sensitive data category (See Section G for technical and administrative measures taken to ensure the security and lawful processing of personal data).

Personal data and special categories of personal data may be transferred abroad with the explicit consent of the data subject. In the absence of the explicit consent of the data subject, in cases where at least one of the data processing conditions specified under the heading "E. Conditions for Processing of Personal Data" is in question,

- Adequate protection is provided.
- Adequate protection is not provided, upon the existence of commitment for adequate protection in writing by the data controllers in Türkiye and in the relevant foreign country and authorisation of the Board,

can be transferred abroad.

G. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN TO ENSURE THE SECURITY AND LAWFUL PROCESSING OF PERSONAL DATA

Our Kulüp takes the necessary technical and administrative measures to ensure the appropriate level of security in physical and electronic recording media in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data, to ensure the safe transfer of personal data in the processes in which personal data is transferred and to ensure the safe storage of personal data. While taking the necessary technical and administrative measures, our Kulüp takes into account the nature of personal data, the recording medium in which it is stored, the means by which personal data will be transferred, the technical facilities and resources of our Kulüp and the extent to which personal data requires security measures.

In this context, the measures taken by our Kulüp to ensure the security of personal data and to process personal data in accordance with the law are as follows:

Technical Measures	Administrative Measures
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<ul style="list-style-type: none"> –Firewalls are used to protect electronic media where personal data are stored against external interference, –Network security and application security is ensured. –Closed system network is used for personal data transfers via network, –Security measures are taken within the scope of procurement, development and maintenance of information technology systems, –The security of personal data stored in the cloud is ensured, –Authorization matrix has been created for employees, –Access logs are kept regularly. –Data masking measures are applied when necessary. –Up-to-date anti-virus systems are used, –Firewalls are used, –Personal data security is monitored. –Personal data, information systems containing personal data are backed up and the security of backed up personal data is ensured by encrypting and taking other relevant measures, –User account management and authorization control system are implemented and monitored, –Log records are kept without user intervention, –Intrusion detection and prevention systems are used, 	<ul style="list-style-type: none"> –Corporate policies on access, information security, use, storage and destruction of personal data have been prepared and implemented, –Personal data security policies and procedures have been determined, –Existing risks and threats to personal data have been identified, –Employees who change their positions or leave their jobs are no longer authorized to access personal data, –Secure software development lifecycle procedures and policies are implemented, –The signed contracts contain data security provisions, –There are disciplinary regulations for employees that include data security, –A personal data processing inventory was prepared, –It is ensured that employees are periodically trained on issues related to data security, such as not disclosing and sharing personal data unlawfully, and that awareness-raising activities are carried out for employees, –Extra security measures are taken for personal data transferred via paper and the relevant document is sent in the format of a confidential document,
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<ul style="list-style-type: none"> –Penetration test is applied. –Cyber security measures have been taken and their implementation is constantly monitored, –Information systems are kept up to date, –In order to ensure the security of information systems against environmental threats, hardware (access control system that allows only authorized personnel to enter the system room, 24/7 monitoring system, ensuring the physical security of the edge switches that make up the local area network, fire extinguishing system, air conditioning system, etc.) and software (firewalls, intrusion prevention systems, network access control, malware prevention systems, etc.) measures are taken, –Access to personal data stored in electronic or non-electronic media is restricted according to the principles of authorization - access, –Necessary measures are taken by identifying risks, threats, vulnerabilities and vulnerabilities, if any, for information systems. 	<ul style="list-style-type: none"> –Necessary security measures are taken regarding entry and exit to and from physical environments containing personal data, –Physical environments containing personal data are secured against external risks (fire, flood, etc.), –Security of environments containing personal data is ensured, –Confidentiality undertakings are made to ensure the confidentiality of data, –Data transfer agreements are signed with the data controllers and data processors to whom personal data is transferred and their awareness is ensured, –In the event that personal data is unlawfully obtained by third parties, the procedures to be applied to notify the relevant persons and the Board have been determined, –Policies and procedures for the security of special categories of personal data have been determined and implemented, –Awareness of data processing service providers on data security is ensured.
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Our Kulüp takes all necessary confidentiality measures within the scope of ensuring the security of the personal data it processes and carrying out the processing activities in accordance with the Law and the relevant legislation.

All technical and administrative measures are taken within the framework of the technological possibilities and implementation costs of our Kulüp in order not to disclose personal data to third parties in violation of the provisions of the Law and this Policy, not to use personal data for a purpose other than the purpose of processing and to prevent personal data from being obtained by others in ways that are not in accordance with the Law (see Title G / Section 1 and 2).

Our Kulüp has also established the necessary mechanisms within the Kulüp to notify the data subjects whose personal data has been accessed by unauthorized persons and the Board in the event of an attack on the personal data obtained or access to personal data by other means, or if personal data is accessed by unauthorized third parties. The necessary administrative and technical measures to eliminate or mitigate the effects of a possible data breach are handled sensitively within the Kulüp. In this direction, a Data Breach Response Procedure has been established and this procedure has been shared with the employee within our Kulüp.

Within the Kulüp, awareness and training activities are carried out for our employees in order to raise awareness of our employees regarding personal data processing processes and to create a personal data protection awareness. In addition, information activities are carried out on the Law and all policies prepared within the Kulüp regarding the protection and processing of personal data.

H. RIGHTS OF THE DATA SUBJECT

Article 11 of the Law regulates "data subject rights". All natural persons whose personal data are processed by Eczacıbaşı Sport Kulübü have the right to apply to our Kulüp in accordance with the Law and to exercise their legal rights listed in the Law.

The rights listed in Article 11 of the Law are listed below:

- Learn whether your personal data is processed by Eczacıbaşı Spor Kulübü or not,
- Demand information if your personal data has been processed,
- Purposes of processing your personal data and learning whether personal data are used in compliance with the purpose,
- Learning the third parties to whom your personal data are transferred in country or abroad,
- To request correction of incomplete or incorrectly processed personal data and notification of this process to third parties to whom personal data is transferred,
- Although your personal data has been processed in accordance with the Law and the relevant legislation, in the event that the reasons requiring the processing of personal data disappear, to request the deletion or destruction of your data and to request notification of this transaction to third parties to whom your personal data has been transferred,
- To object if the analysis of your processed personal data exclusively through automated systems has revealed a result against you,
- To claim compensation for the damage arising from the unlawful processing of his/her personal data.

When applying to our “Kulüp” to exercise your rights, you may choose one of the following methods:

- By filling out the Personal Data Information Request Form at <https://www.eczacibasisporkulubu.org.tr/> ;
- By signing with a secure electronic signature or by using your e-mail address registered in our systems, you can send an e-mail containing your requests to the e-mail address sporkulubukvkk@eczacibasi.com.tr.
- You can deliver it in writing to Eczacıbaşı Spor Kulübü Kemerburgaz Caddesi, No. 21, 34450 Ayazağa İstanbul/Turkey, or you can send it by mail or notary public.

- Additional methods to exercise your rights are also specified in [Communiqué on the Principles and Procedures For The Request To Data Controller](#). If you wish, you may also choose one of the methods specified in this Communiqué.

I. UPDATING THE POLICY

This Policy is reviewed and updated by Eczacıbaşı Spor Kulübü as and when necessary.

Apart from this, even if the Policy has not been updated due to changes in the relevant legislation, especially the Law and secondary regulations and Board decisions, the changes in the relevant legislation will be applied immediately.

J. QUESTIONS ABOUT POLICY

For all your questions regarding this Policy and the processing of personal data, please contact Kulüp contact person via sporkulubukvkk@eczacibasi.com.tr

Last Update Date: ___/___/___