CLARIFICATION / INFORMATION PROTECTION OF PERSONAL DATA LAW ("PDPL")

As AVRASYA Sera Gazı Doğrulayıcı Kuruluş Mühendislik A.Ş (hereinafter referred to as 'AVRASYA'), located at Mevlana Blv. No: 221 Yıldırım Kule 109-8, 109-9 Çankaya/Ankara, in our capacity as the Data Controller, we are fully aware of our responsibility to ensure that your personal data is processed securely. In this context, we would like to inform you about your rights and the obligations of our company regarding the Personal Data Protection Law No. 6698 ("PDPL").

AVRASYA attaches great importance to the security of personal data processed within the scope of PDPL and all kinds of physical, electronic and managerial measures are taken to ensure this. Your personal data will be kept for as long as the purpose of the data processing is valid. Necessary security measures are taken to prevent the loss of stored and recorded data, to prevent unauthorized access and to prevent illegal use. In this context, there is the "Pr.06 Confidentiality Protection Procedure" of AVRASYA, which has been implemented since 15.12.2016, and AVRASYA is subject to surveillance audits by the Turkish Accreditation Agency (TÜRKAK) every year and the processes regarding confidentiality are audited by this authorized institution.

Related Definitions

a) Explicit consent: Consent regarding a specific subject, based on information and expressed with free will,
b) Anonymization: Making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching it with other data,
c) Relevant person: The real person whose personal data is processed,
d) Personal data: Any information related to an identified or identifiable natural person,
e) Processing of personal data: Any operation performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or non-automatic means provided that it is a part of any data recording system,
f) Data processor: Real or legal person who processes personal data on behalf of the data controller based on the authority granted by him,
g) Data controller: Refers to 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 recording system.

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Processed Personal Data, Data Subjects and Data Categories

Personal Data and data categories processed by our Company during the verification processes and during the continuation of verification activities are as follows:

Data Subjects	Data Type	Data Category
Representative at the installation/operator/authorized /responsible/employee and interviewees throughout the Verification Process	Name, Surname, TR Identity Number, Signature	Basic Identity Data
	Unit, Its task, Experience, E-Mail Address, Phone Number	Basic Operation Data
	Title, In the Installation Special Duties, Photo	Custom Study Data

Purposes of Processing Personal Data

Under the national legislation, including the relevant Regulations and Communiqués, guidelines published by TURKAK, and international standards, there is an obligation to collect evidence regarding emission data verified during the verification processes.

During the verification processes, many different people are interviewed and significant data is collected in order to collect the necessary evidence. In the interviews with the installation supervisor and unit supervisors, it is necessary to obtain basic identity data, basic work data and special work data of the persons. When necessary, photographs of the process, machinery/equipment in the installation/operator are taken and in some cases, people can be seen in these photographs. In addition, when it is necessary to use photographs of the process, machinery/equipment in the installation/operator in the promotional brochures and website of AVRASYA they are used in such a manner that the faces and silhouettes of individuals are not visible or not clearly identifiable.

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Method of Collecting Your Personal Data

Personal data can be collected during the site work and office work phases of the verification processes carried out by our company. In site studies, basic identity data, basic work data, special work data of the representative/official/responsible/employee in the installation/operator can be obtained to be used in the documents defined in the AVRASYA quality management system. In addition, this data can be obtained digitally or in printed form by e-mail, digital data transfer methods.
Consent is obtained from the data subjects before collecting the data. In case of failure to obtain consent
data is not provided.

Conditions for Processing Your Personal Data

Within the scope of Article 5 of the Personal Data Protection Law;
(1) Personal data cannot be processed without the explicit consent of the person concerned.
(2) In the presence of one of the following conditions, it is possible to process personal data without seeking the explicit consent of the data subject:
a) It is clearly stipulated in the laws.
b) It is necessary for the protection of the life or bodily integrity of the person who is unable to express their consent due to actual impossibility or whose consent is not legally valid.
c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract.
ç) It is mandatory for the data controller to fulfill its legal obligation.
d) It has been made public by the person concerned.
e) Data processing is mandatory for the establishment, exercise or protection of a right.
f) Provided that it does not harm the fundamental rights and freedoms of the data subject, data processing is mandatory for the legitimate interests of the data controller.

Transfer/Sharing of Personal Data

The data obtained during the verification process, which is evidence to be submitted to the organizations that audit our company (Ministry of Environment and Urbanization and TÜRKAK), are stored in accordance with the provisions of the relevant legislation and shared only with these institutions/organizations upon request.

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Your rights

Within the scope of Article 11 of the Personal Data Protection Law;
By applying to our Company within the scope of personal data protection legislation;

(1) Everyone has the right to apply to the data controller and make a statement about themself;
a) To learn whether personal data is processed,
b) Requesting information if personal data has been processed,
c) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
ç) To know the third parties to whom personal data is transferred in the country or abroad,
d) To request correction of personal data in case of incomplete or incorrect processing,
e) Within the framework of the conditions stipulated in Article 7, the deletion or destruction of personal data
requesting to be done,
f) The transactions carried out pursuant to subparagraphs (d) and (e) are carried out to third parties to whom personal data is transferred.
requesting notification,
g) To object to the emergence of a result against the person themself by analyzing the processed data exclusively through automated systems,
ğ) In case of damage due to unlawful processing of personal data, the damage,
to request remedy,
has the rights.

When you want to exercise these rights, you can apply in writing to Mevlana Blv. No: 221 Yıldırım Kule 109-8, 109-9 Çankaya / ANKARA or to the info@avrasyaseragazi.com.tr e-mail address.