

Policy on Processing and Protection of Personal Data for the Central Finance and Contract Unit (CFCU)

1. Objective

This policy (Policy) on processing and protection of personal data is issued to determine the procedures and principles regarding the work and transactions for the personal data processing activities carried out by the Central Finance and Contract Unit (CFCU) as the Data Controller.

By this policy, it is aimed to fulfill the requirements stipulated in the legislation, and in this context, to put the revisions of the legislation that may occur into the practices of the CFCU. The implementation basis of this policy is determined as the fulfillment the operations of the CFCU in accordance with the provisions of the legislation, together with other complementary policies when necessary.

In line with its mission, vision and basic principles, the CFCU gives priority to the processing of personal data belonging to employees, employee candidates, service providers, visitors of the CFCU and the other third parties (project beneficiaries, contractors, etc.) in accordance with the Turkish Constitution, international conventions, the Law on the Protection of Personal Data No. 6698 and the other relevant legislation, taking into account the studies to comply with the requirements of the General Data Protection Regulation of the European Union.

2. Scope

The personal data belonging to employees, employee candidates, service providers, visitors of the CFCU and the other third parties are within the scope of this policy and this policy is applied to all activities related to personal data processing and in all recording media where personal data belonging to or managed by the CFCU, without prejudice to the relevant legislation.

In cases where hesitations or the unclear points are present in this Policy and in cases where the Policy is not sufficient, it is acted in line with other policies applied in the CFCU and the relevant legislation.

Unless otherwise stated in the policy, personal data and sensitive personal data will be collectively referred to as "Personal Data".

3. Definitions and Abbreviations

- * Explicit Consent : Consent on a particular subject, based on information and expressed with free will.
- * Employee : Staff of the Central Finance and Contracts Unit (CFCU).
- * Electronic Media : Environments where personal data can be created, read, changed and written by electronic devices.
- * Non-Electronic Media : All written, printed, visual etc. medias other than electronic media.
- * Service Provider: A natural or legal person who provides services within the framework of a specific contract that issued with the CFCU.
- * Data Subject : A natural person whose personal data is being processed.
- * Disposal: Erasure, destruction or anonymization of personal data.
- * (Applicable) Law : Law on Protection of Personal Data No. 6698.
- * Recording Media: Any media where personal data is processed wholly or partially automatically or non-automatically, provided that it is a part of any data recording system.
- * Personal Data : Any information related to an identified or identifiable natural person.
- * Processing of Personal Data : Any kind of data operation such as obtaining, recording, storing, maintaining, altering, re-organizing, disclosing, transferring, taking over, making obtainable, classifying or preventing the usage of personal data by the ways completely or partially automatic or non-automatic in case of being a part of any data recording system.
- * Board : Personal Data Protection Board.

* Sensitive Personal Data : Any data of race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and clothing, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data of individuals.

* Data Registry System : The registration system in which personal data is structured and processed according to certain criteria.

* 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 registry system.

* Regulation : Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28 October 2017.

4. General Principles

During the processing of personal data, the CFCU, with all staff, acts according to the applicable law, regulation and guidelines prepared by the Personal Data Protection Authority as well as the relevant and complementary legislation.

During the processing of personal data within the CFCU;

- Compliance with the law and honesty rules,
- Being accurate and when necessary up-to-date,
- Processing for specific, explicit and legitimate purposes,
- Being connected, limited and restrained with the purpose for which they are processed,
- To be kept only as long as necessary and for the purpose of which they are processed or which is stipulated in the relevant legislation,

are followed as the general principles.

Personal data cannot be processed and transferred without the explicit consent of the data subject, except for the cases specified in the Law. A particular 'Policy on Adequate Measures to be Taken by the CFCU as the Data Controller in Processing of Sensitive Personal Data' will be prepared and put into action by the CFCU upon the approval of the Director of the CFCU.

While their personal data are obtained, the CFCU informs the data subjects regarding;

- Identity of the CFCU, as a data controller,
- the purpose/s for which personal data will be processed,
- to whom the processed personal data can be transferred and for what purpose,
- the method/s of collecting the personal data and its legal basis,
- and the other rights of data subjects specified in the Article 11 of the applicable Law

and fulfills its obligation to inform the data subjects by this way.

During the operations to be carried out within this scope, it is acted in accordance with the provisions specified in the "Communiqué on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform", which was published in the Official Gazette dated 10.03.2018 and numbered 30356.

5. Procedures for Application, Complaint and Requests

Data subjects can submit their requests related to the implementation of the Law in written or by other methods to be determined by the Board to the CFCU.

The CFCU concludes the submitted request as soon as possible and within 30 days at most, depending on the nature of the request, without any charge. However, if this process requires an additional cost, data subject may need to pay the charge defined in the tariff determined by the Board.

The CFCU may accept the application or reject it by explaining the reasons and accordingly submit the reply/s in written or electronically. If the request in the application is accepted, its requirements are fulfilled by the CFCU. If the application arises from data controller's mistake, the charge is refunded to the applicant data subject.

Regarding the applications to be submitted to the CFCU, the provisions of the 'Communiqué on the Principles and Procedures for the Request to Data Controller' published in the Official Gazette dated 10.03.2018 and numbered 30356 shall constitute the basis for the execution of related operations.

6. Distribution of Responsibilities and Roles

The data controller is the Central Finance and Contract Unit (CFCU). All managers and employees of the Unit provides active support in taking technical and administrative measures in all environments where sensitive personal data is processed, in taking adequate measures determined by the Personal Data Protection Authority about processing sensitive personal data, in order to prevent unlawful processing of sensitive personal data, to prevent unlawful access to sensitive personal data and to ensure that sensitive personal data are stored in accordance with the law, through training and awareness raising, monitoring, continuous inspection and the proper implementation of the technical and administrative measures taken within the scope of the Policy.

The allocation of the titles, sections and job descriptions of those involved in the operations related to the processing and protection of personal data is given in Table 1.

Table 1: Assignment for policy processes

Title	Unit/ Section	Assignment
PAO- CFCU Director	Central Finance and Contract Unit	Responsible for the employees to act in accordance with the Policy.
Information and Data Management Structure	Information and Data Management Structure	Responsible for the coordination of these functions: preparation, development, execution, publication and updating of the Policy in relevant environments.
All Other Departments	Other Departments/Sections	Responsible for the execution of the Policy in accordance with their duties, for performing the work and transactions required by the Policy.

7. Explanations Regarding Storage and Disposal

Personal data belonging to employees, employee candidates, visitors, real persons from institutions and organizations served under contracts and protocols and the personal data belonging to the third parties involved as service providers and employees of institutions or organizations are stored securely and destroyed in accordance with the Law by the Unit. The related actions and processes are

prepared by the CFCU and they are carried out in line with the 'Policy on Storage and Disposal of Personal Data', which will put into force following the approval of the Director of the CFCU.

8. Technical and Administrative Measures

By the CFCU;

- * the technical and administrative measures for keeping the personal data safe and preventing illegal process and access to the personal data pursuant to the Article 12 of the applicable law,
 - * the measures for legal disposal of the personal data pursuant to the Article 7 of the applicable law and the regulation,
 - * the adequate measures to be determined by the Board for the sensitive personal data pursuant to the fourth paragraph of the Article 6 of the law
- are taken.

In this context, the technical and administrative measures to be taken are determined in 'Policy on Storage and Disposal of Personal Data', which is prepared by the CFCU and put into force upon the approval of the Director of the CFCU.

9. Publication and Storage of the Policy

This policy is published in two different media, with wet signature (printed paper) and electronically, and is disclosed to the public on the website. The printed paper copy is also kept in the Information and Data Management Structure file.

10. Update Period of the Policy

This policy is reviewed when required and the necessary parts are updated accordingly.

11. Enforcement and Annulment of the Policy

This Policy is deemed to have entered into force as of 01.01.2022. In the event that it is decided to be annulled, upon the decision of the Director of the CFCU, the wet

signed old version/s of the policy is cancelled (with sealing of cancellation or by writing 'cancelled' on it) by the Information and Data Management Structure, then signed accordingly and kept for at least 5 years by the Information and Data Structure.