

	PERSONAL DATA PROTECTION AND PROCESSING POLICY	Document Nr.: BITES.KVKK.PL.02 Edition Nr.: 1.0 Revised on: -
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1 PURPOSE

BITES Savunma Havacılık ve Uzay Teknolojileri Yazılım Elektronik Ticaret A.Ş. ("BITES") pays utmost care to processing and protection of personal data in accordance with the law pursuant to the Law Nr. 6698 on the Protection of Personal Data ("Law"). For this reason, great importance is attached to the protection of your personal data during all planning and activities at BITES. In this context, your personal data is protected in compliance with this Personal Data Protection and Processing Policy ("Policy") with fully awareness of our responsibilities.

The primary purpose of this policy is to explain the systems about processing and protection of personal data in accordance with the laws and the purpose of the Law and to inform data subjects whose personal data are processed by BITES accordingly. In this way, it is intended to ensure total harmonization with the legislation in protecting and processing personal data by BITES and to protect all rights of personal data owners originating from the legislation concerning personal data.

2 SCOPE

This Policy covers individuals whose personal data is processed by BITES through automated or non-automated means subject to being a part of any data recording system.

3 DEFINITIONS & ABBREVIATIONS

3.1 Abbreviations

Table 1 Abbreviations

Abbreviation	Description
KEP	Registered Electronic Mail
KVK	Protection of Personal Data

3.2 Definitions

Table 2 Definitions

Definition	Description
Explicit Consent	Consent concerning a specific matter, based upon being informed and described with free will.
Anonymization	Rendering personal data impossible to associate with a specific or identifiable natural person, even if is paired with other data.
Personal Data	Any information relating to an identified or identifiable natural person.
Processing of Personal Data	Any action performed on data including but not limited to obtaining, recording, storing, keeping, altering, reorganizing, describing, transferring, taking over, making available, classifying or preventing

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Definition	Description
	the use of personal data through completely or partially automated or non-automated means subject to being a part of data recording system
Board	Board for the Protection of Personal Data
Sensitive Personal Data	Data about race, ethnicity, political idea, philosophical belief, religion, sect or other ethos, appearance, affiliation with association, foundation or trade union, data about health, sexual life, conviction and security precautions and biometric and genetic data are considered as sensitive personal data.
Policy	BITES Personal Data Protection and Processing Policy.
Data Processor	Natural person or legal entity who process personal data on behalf of and based upon the authorities vested by data controller
Data Controller	Data controller who specifies the purposes and means of processing personal data and administers the systematic recording media of data (data recording system).

4 REFERENCES AND SOURCES

Table 3 References and Sources

Reference/Source Nr.	Name of Reference/Source
6698	Law on the Protection of Personal Data
-	Regulation on the Erasure, Destruction or Anonymization of Personal Data
-	Communique on Principles and Procedures in Fulfilling the Obligation of Clarifications
-	Communique on Principles and Procedures for Application to Data Controller

5 Processing and Transferring Personal Data

5.1 Guidelines on Processing Personal Data and Sensitive Personal Data

BITES processes Personal Data in accordance with the procedures and principles stipulated in the Law and in this policy. BITES acts in conformity with the principles listed in such Law in processing the personal data.

5.2 Terms and Conditions for Processing Personal Data and Sensitive Personal Data

BITES processes Personal Data in accordance with the terms and conditions stipulated in the Law. BITES takes necessary measures as defined by the Personal Data Protection Board.

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5.3 Domestic or Cross-Border Transfer of Personal Data

BITES acts in accordance with the conditions and principles stipulated in the Law with regard to the transfer of Personal Data. BITES takes all necessary security measures in line with its purposes for processing Personal Data and may transfer all Personal Data, including Sensitive Personal Data, to third parties in accordance with the Law.


6 Personal Data Categories, Purposes of Processing and Transferring and Transferees of Personal data

6.1 Personal Data Categories

BITES processes the Personal Data specified below in accordance with the terms and conditions on personal data processing as stipulated in the Law.

Table 4 Personal Data Category

PERSONAL DATA	SCOPE
Information about Family Members and Kindred	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system and can be accessed to in case of emergencies concerning the family members and relatives of personal data owner in order to protect legal or other benefits of BITES or Personal Data Owner or within the scope of acts and actions executed by BITES.
Information about Convictions and Security Precautions	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system with regard to convictions and security precautions.
Finance Information	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including that information which indicate all kinds of financial results as generated by the type of legal relation between BITES and personal data owner and information such as personal data recorded on documents, customer number and IBAN number.
Physical Environment Security Information	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including footages during entry into physical environment and during the length of stay at that physical environment and records obtained at security point.

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PERSONAL DATA	SCOPE
Information about Audio and Video Records	Data that explicitly belongs to a specific or identifiable natural person and contains personal data including photograph, camera and voice records, included in documents as copies of documents containing personal data.
Information about Legal Actions	Data processed within the scope of legal obligations and legal determination of all rights of BITES.
Contact Information	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including telephone number, address, e-mail address, IP address etc.
Information about Process Security	Personal data processed with regard to technical, administrative, financial, legal or commercial security of personal data owner or BITES
Identification	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including the information about the identification of a person including but not limited name, surname, Turkish ID number, nationality, mother's name, father's name, place of birth, date of birth, gender, driver's license, SSI number and signature.
Information about Professional Experience	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including information about diploma, courses, on-the-job training and transcripts.
Information about Customer Transactions	Information that contains instructions and requests necessary for the use of products and services by the user and records on the use of BITES products and services.
Personal Information	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including all kinds of personal data processed to obtain information as basis for generating personal rights of natural persons who have business relation with BITES.
Information about Risk Management	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including information to manage technical, commercial and administrative risks.
Medical Information	Information that explicitly belongs to a specific or identifiable natural person and can be processed through fully or partially automated or non-automated means subject to being a part of data recording system including information about disability, prostheses and aids used.

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6.2 Purposes of Processing and Transferring Personal Data

Personal Data is processed by BITES in conformity with the principles and terms and conditions stipulated in the Law and in accordance with the purposes including but not limited to the following:

- Planning and implementation of human resources policies;
- Fulfillment of mandatory obligations in an accurate and complete manner pursuant to relevant laws, regulations, orders or contracts;
- Planning, executing and managing business partnerships and strategies;
- Ensuring corporate operations, planning, executing and managing administration and communication activities;
- Ensuring utmost data security;
- Planning, conducting and managing relations with suppliers and other shareholders;
- Planning, conducting and managing recruitment processes;
- Executing and monitoring all legal processes; and
- Informing authorized institutions and organizations.

6.3 Transferees of Personal Data

Personal Data may be transferred by BITES to shareholders and suppliers of BITES, Public Institutions and Organizations and third parties to the extent relevant in accordance with the terms and conditions and principles stipulated in the Law.

7 Collection Methods and Legal Grounds, Destruction Process and Storage Period of Personal Data

7.1 Personal Data Collection Methods and Legal Grounds


Personal Data is collected and processed by BITES in accordance with legal rights and responsibilities or for the purpose of attaining the goals defined in this Policy through any oral, written, electronic means and methods.

7.2 Destruction of Personal Data

BITES destroys the Personal Data, in case where reasons that require processing disappear despite being processed in accordance with the Law on the Protection of Personal Data and other legislative provisions, on ex-officio basis or upon request by data subject pursuant to the terms and conditions and principles stipulated in the Law. Procedures and principles concerning the destruction of Personal Data are regulated in BITES Personal Data Storage and Destruction Policy.

7.3 Storage Period of Personal Data

BITES retains Personal Data for periods stipulated in legal regulations or for a period to be defined according to the activities performed if such a period is not specified. Upon expiry of such period, such data is destroyed by BITES. Principles and procedures on storage periods of such Personal Data are regulated in BITES Personal Data Storage and Destruction Policy.

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8 Rights of Personal Data Owner, Exercise and Assessment of Rights

8.1 Clarification of Personal Data Owner

BITES clarifies Personal Data Owners about the purpose, procedure and principles of processing personal data and about the storage and destruction of personal data in accordance with the principles and procedures stipulated in Law Nr. 6698. BITES has issued clarification texts with regard to Processing of Personal Data and has performed any necessary actions for the access of concerned parties.

8.2 Rights of Personal Data Owner Provided by Law

Clarifications by BITES concerning the purpose, procedure and principles of processing personal data and storage and destruction of personal data also include the rights of personal data owner provided by law.

8.3 Exercise of Rights by Personal Data Owner

Pursuant to clause 1 Article 13 of the Law on “Application to Data Controller”, you may submit all your requests to BITES either in written or through other means specified by the Board for the Protection of Personal Data. In this context, the means and procedures for your applications to BITES are explained as follows:

In order to exercise your rights, you may send your request with all necessary information to make your identity clear and understandable, including your statement about your request to exercise your rights specified in Article 11 of the Law, by filling in the Application Form under BITES KVK and sending a signed copy of such form to kvkbasvuru@BITES.com.tr or personally deliver to or submit through public or through any other means specified in the Law Nr. 6698 on the Protection of Personal Data to BITES Savunma Havacılık ve Uzay Teknolojileri Yazılım Elektronik Ticaret Anonim Şirketi at Mustafa Kemal Mahallesi, Dumlupınar Bulvarı, No:280/G Kat:4 No:411 Çankaya / Ankara with identifying documents or send the said form with a secure electronic signature to the KEP (registered electronic mail) address of BITES at BITESsav@hs01.kep.tr.

8.4 Procedure and Period of Response by BITES to Applications

BITES concludes requests in applications as soon as possible however not later than thirty days depending on the nature of request without any charges. If such process requires any extra costs, fees in the tariff specified by the Board for the Protection of Personal Data may be charged. BITES may accept or deny such request with justification. BITES notifies its response either in written or electronically. If request in application is accepted, BITES performs necessary actions related thereto.

8.5 Right to Complain of Personal Data Owner to the Board for the Protection of Personal Data

In case where application is rejected, or response is considered to be insufficient or is not responded within due time, data owner is entitled to complain to the Board for the Protection of Personal Data within 30 (thirty) days after receiving the reply or within 60 (sixty) days after date of application in any case.

9 Updates, Harmonization and Amendments

BITES reserves the right to amend this Policy and other policies related to and associated with this Policy.