

General

The protection of personal data stands as a core priority for our company. We hereby declare that personal data is processed in accordance with the following principles:

- ❖ Compliance with the law and the principle of good faith,
- ❖ Accuracy and, where necessary, keeping data up to date,
- ❖ Processing for specific, explicit, and legitimate purposes,
- ❖ Relevance, limitation, and proportionality to the intended purposes of processing, and
- ❖ Secure retention for the duration stipulated by applicable legislation or as long as necessary and lawful for the processing purposes.

We provide this information to fulfill our obligation to inform you, in our capacity as the data controller, as “**ERNA MAŞ MAKİNA TİCARET VE SANAYİ ANONİM ŞİRKETİ**”, located in “Hadımköy Mahallesi, Prof. Mehmet Bozkurt Caddesi, No:1, 34555, Arnavutköy, İstanbul”, pursuant to Article 10 of the [Law on the Protection of Personal Data No. 6698, dated 24/03/2016](#).

In all personal data processing activities we undertake, we fully comply with the obligations and principles set forth by the relevant legislation, particularly the Law on the Protection of Personal Data (PDPL), and implement all necessary technical and administrative measures to ensure an appropriate level of security, prevent unlawful processing and unauthorized access, and safeguard your personal data.

Even if processed in accordance with the PDPL and other applicable laws, personal data will be deleted, destroyed, or anonymized by our company, either ex officio or upon the request of the data subject, if the purposes requiring its processing no longer exist. For more detailed information regarding the procedures for deletion, destruction, or anonymization of personal data, please refer to our Personal Data Protection Policy available on our website.

Processed Personal Data

- ❖ Identity information: Name, surname
- ❖ Physical space security: Entry and exit records of employees and visitors, camera records
- ❖ License plate information

Purposes of Processing Personal Data

Pursuant to Law No. 6698 on the Protection of Personal Data, your personal data is processed for the following purposes:

- ❖ Execution of emergency management processes,
- ❖ Execution of information security processes,
- ❖ Execution of audit and ethical compliance activities,
- ❖ Management of access authorizations,
- ❖ Execution of activities in accordance with applicable legislation,
- ❖ Ensuring physical space security,
- ❖ Execution of communication activities, and
- ❖ Creation and tracking of visitor records.

Legal Basis for Processing Personal Data and Methods of Collection

Your personal data are processed based on the legal grounds specified in Article 5 of the Law, including: “Explicit consent of the data subject,” “Explicitly stipulated in the laws,” “Data processing is mandatory for the establishment, exercise or protection of a right,” “Processing of personal data belonging to the parties to the contract is necessary, provided that it is directly related to the establishment or performance of a contract,” “It is mandatory for the data controller to fulfill its legal obligation,” and “Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.”

Personal data may be collected through automatic, semi-automatic, or non-automatic methods. The information obtained through these methods is then recorded and incorporated into the data recording system.

Transfer of Personal Data

Domestic

As a general rule, personal data cannot be transferred without the explicit consent of the data subject. However, personal data may be transferred without explicit consent, provided that sufficient safeguards are in place as outlined in the second paragraph of Article 5 of the Law, and if one of the conditions set forth in the third paragraph of Article 6 is met. Provisions under other applicable laws regarding the transfer of personal data remain reserved.

Our Company may transfer personal data to administrative and judicial authorities when necessary, in a manner that is limited and proportionate to the purposes specified under the section titled “Purposes of Processing Personal Data.”

Abroad

Personal data may be transferred abroad by data controllers and data processors if one of the conditions specified in Articles 5 and 6 of the Law is met and there is an adequacy decision regarding the country, specific sectors within that country, or the international organization to which the transfer will be made.

In the absence of both an adequacy decision and the appropriate safeguards outlined in the fourth paragraph of the Law, such transfers may still occur on an exceptional basis, provided that one of the conditions listed under subparagraphs (a) through (f) of the sixth paragraph is present.

Our Company may transfer personal data to the company responsible for managing the security and camera systems, as well as to the police, gendarmerie, other security personnel, administrative bodies, and judicial authorities, when necessary, in a manner that is limited and proportionate to the purposes outlined under the heading “Purposes of Processing Personal Data.”

Rights Under the Law on the Protection of Personal Data

Pursuant to Article 11 of Law No. 6698 on the Protection of Personal Data, you have the following rights, which you may exercise at any time by applying to our Company:

- ❖ To learn whether your personal data is being processed,
- ❖ To request information if your personal data has been processed,
- ❖ To learn the purpose of processing your personal data and whether it is being used in accordance with that purpose,
- ❖ To know the third parties to whom your personal data is transferred, whether domestically or abroad,
- ❖ To request the correction of your personal data if it is incomplete or inaccurately processed,
- ❖ To request the deletion or destruction of your personal data,
- ❖ To request that third parties to whom your data has been transferred be informed of any corrections, deletions, or destruction carried out,
- ❖ To object to the occurrence of a result against you through the exclusive analysis of your personal data by automated systems,
- ❖ To request compensation for damages in the event you suffer harm due to the unlawful processing of your personal data.

Individuals who wish to obtain information or submit a request regarding their personal data may do so within the scope of Article 11 of the Law, which regulates the rights of the data subject, by completing the Personal Data Owner Application Form in accordance with the [“Communiqué on the Procedures and Principles of Application to the Data Controller.”](#)

	PHYSICAL VISITOR CLARIFICATION TEXT	Document No	KVK01/F14
		Release Date	27.07.2020
		Revision Date	16.05.2025
		Revision No.	01
		Level of Confidentiality	Internal Use
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Note: Application procedures and related details are outlined in the “[Personal Data Owner Application Form](#).”

This clarification text may be updated to reflect changes in circumstances or legal regulations. Any updates made by our Company will be announced on our website.

We respectfully present this information for your attention.