PRIVACY NOTICE

Koc University ("University") occasionally stores and lawfully processes your data considered as "personal data" within the scope of the Law on Protection of Personal Data No: 6698 (the "LPPD") during your university enrollment and your study at the University. In this manner, we would like to inform you, in accordance with the LPPD and relevant regulations, regarding how and for which purposes personal data is processed by our University bearing the title "data controller" in accordance with the LPPD, and the technical and administrative measures taken in order to protect your personal data.

1. Principles Relating to Processing of Personal Data

Personal data is processed in the light of the principles below:

- a) Lawfulness, fairness and transparency.
- b) Accuracy and where necessary, keeping up to date.
- c) Processing for specified, explicit and legitimate purposes.
- d) Adequacy, relevancy and limitation to what is necessary in relation to the purposes for which they are processed.
- e) Storing only as long provisioned by relevant regulations or necessary for the purposes for which they are processed.

2. Obligation to inform

Article 10 of the LPPD imposes an obligation on the data controllers to inform those whose personal data are processed whilst obtaining their consent in this regard and requires the data subjects to be informed. University, bearing the title 'data controller' in accordance with the relevant provision must inform the data subjects regarding:

- a) the identity of the data controller,
- b) the purposes for which the personal data are processed,
- c) to whom and for what purposes the processed personal data may be transferred,
- d) the methods and the legal grounds for the collection of personal data,
- e) the rights which the data subject may exercise against the data controller in accordance with Article 11 of the LPPD.

As University, we are informing all our personnel regarding the processing and protection of personal data in accordance with Article 10 of the LPPD with this Privacy Notice.

3. Data Controller

Article 3/1(1) of the LPPD defines data controller as "Real or legal persons who determine the purposes and means of processing personal data, who are responsible for the establishment and management of the data registry system" and within this framework, University bears the title of data controller.

4. Which Personal Data Can Be Processed?

During your university enrollment and throughout your study at the University, your personal data collected via this platform varies according to purposes mentioned below. Your personal data collected can be listed as follows:

ID INFORMATION PROCESSED PERSONAL PROCESSING PURPOSES DATA Name surname Planning and Execution of Student Registration Processes, Execution of All Mother / Father Name Academic and Administrative Operations including Administrative Discipline Processes, Execution of Student Clubs Processes, Execution of Academic and Date of birth Social Activity Processes, Management and Execution of Student Requests and Place of birth Complaints, Execution of Survey Processes, Management and Execution of Gender Turkish Identity Number Scholarship Processes, Execution of Work & Study Processes, Execution of all Copy of ID Card International Student Program Processes including Erasmus and Exchange Nationality Programs, Development of Student Relations and Orientation Studies, Planning Diploma Copy and Execution of all Dormitory and Accommodation Processes including Signature Dormitory Registration, Execution of Information Technologies, Information Photograph Security and Account Management Processes, Execution of Training Activities, Execution of Business Activities, Management and Execution of Financial and Accounting Processes, Planning and Execution of Corporate Communication and For Foreign Students: Foreign Identity Number Public Relations Processes, Management and Execution of Emergency Processes, Execution of On-Campus Operations, including Health Center Processes, Photocopy of the passport Occupational Health and Safety Processes, Management and Execution of Passport number Graduation and Alumni Association Processes, Student and Alumni Career Development Processes, Execution of On-Campus Operations, including Execution of On-Campus Operations, Utilization of on-Campus Facilities, Execution of Activities in Compliance with the Legislation, Execution of Communication Activities, Execution of Contract Processes, Follow-up and Execution of Legal Affairs, Organization and Event Management, Execution of Social Responsibility and Civil Society Activities, Execution of Sports Organizations and Sports Activity Processes, Execution of Talent/Career Development Activities, Carrying out digital marketing operations, Sharing information about our Academic Programs, Carrying out advertising, campaigns, promotions, digital marketing processes, Management of customer relations, Informing potential applicants within the scope of our operations and services, Providing Information to Authorized Persons, Institutions and Organizations, Execution of Storage, Deletion and Archive Activities. **LEGAL BASIS FOR** Your personal data is processed, in line with the realization of the above-PROCESSING PERSONAL mentioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons; **DATA** That the processing is expressly stipulated in the law That it is obligatory 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 That it is obligatory for the data controller to fulfill their legal obligation That the data processing is mandatory for the legitimate interest of the data controller, provided that it does not harm the fundamental rights and freedoms of the Data Subject. METHODS OF Your personal data is collected by physical or electronic methods and means. **COLLECTING PERSONAL DATA CONTACT INFORMATION**

PROCESSED PERSONAL DATA	PROCESSING PURPOSES
 E-mail address Contact info Phone number Residence address 	Planning and Execution of Student Registration Processes, Execution of All Academic and Administrative Operations including Administrative Discipline Processes, Execution of Student Clubs Processes, Execution of Academic and Social Activity Processes, Management and Execution of Student Requests and Complaints, Execution of Survey Processes, Management and Execution of Scholarship Processes, Execution of Work & Study Processes, Execution of all International Student Program Processes including Erasmus and Exchange Programs, Development of Student Relations and Orientation Studies, Planning and Execution of all Dormitory and Accommodation Processes including Dormitory Registration, Execution of Information Technologies, Information Security and Account Management Processes, Execution of Training Activities, Execution of Business Activities, Management and Execution of Financial and Accounting Processes, Planning and Execution of Corporate Communication and Public Relations Processes, Management and Execution of Emergency Processes, Execution of Health Center Processes, Execution of Occupational Health and Safety Processes, Execution of Student and Alumni Career Development Processes, Execution of on-Campus Operations, including utilization of on-Campus Facilities, Execution of Activities in Compliance with the Legislation, Execution of Communication Activities, Execution of Contract Processes, Follow-up and Execution of Legal Affairs, Organization and Event Management, Execution of Social Responsibility and Civil Society Activities, Execution of Sports Organizations and Sports Activity Processes, Execution of Talent/Career Development Activities, Carrying out digital marketing operations, Sharing information about our Academic Programs, Carrying out advertising, campaigns, promotions, digital marketing processes, Management of customer relations, Informing potential applicants within the scope of our operations and Services, Providing Information to Authorized Persons, Institutions and Organizations, Execution o
LEGAL BASIS FOR PROCESSING PERSONAL DATA	Your personal data is processed, in line with the realization of the above-mentioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons; • 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 • That it is obligatory for the data controller to fulfill their legal obligation • That the data processing is obligatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the Data Subject.
METHODS OF COLLECTING PERSONAL DATA	Your personal data is collected by physical or electronic methods and means.
FINANCIAL INFORMATION	
PROCESSED PERSONAL DATA	PROCESSING PURPOSES

 Bank account information IBAN Information 	Planning and Execution of Student Registration Processes, Planning and Execution of all Dormitory and Accommodation Processes, including Dormitory Registration, Management and Execution of Financial and Accounting Processes, Execution of Activities in Compliance with the Legislation, Providing Information to Auhtorized Persons, Institutions and Organizations, Execution of Deletion, Storage and Archive Activities.
LEGAL BASIS FOR PROCESSING PERSONAL DATA	Your personal data is processed, in line with the realization of the above-mentioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons; • 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 • That it is obligatory for the data controller to fulfill their legal obligation • That the data processing is obligatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the Data Subject.
METHODS OF COLLECTING PERSONAL DATA ACADEMIC AND PROFESSION	Your personal data is collected by physical or electronic methods and means. ONAL EXPERIENCE INFORMATION
THE IDENTIFY THE PROPERTY OF T	
PROCESSED PERSONAL DATA	PROCESSING PURPOSES
PROCESSED PERSONAL	PROCESSING PURPOSES Planning and Execution of Student Registration Processes, Management and
PROCESSED PERSONAL DATA Diploma Information Information on Schools, Summer Schools and Courses Certificates Transcript Information Foreign Language/s Known Work and Internship Experience Scholarship Information (If any) Sports History and Sportsmanship (If any)	PROCESSING PURPOSES Planning and Execution of Student Registration Processes, Management and Execution of Scholarship Processes, Execution of Work & Study Processes, Execution of all International Student Program Processes including Erasmus and Exchange Programs, Execution of Information Technologies, Information Security and Account Management Processes, Execution of Business Activities, Graduation and Alumni Association Management and Execution of Student and Graduate Career Development Processes, Execution of Activities in Compliance with the Legislation, Execution of Communication Activities, Execution of Contract Processes, Follow-up and Execution of Legal Affairs, Execution of Talent/Career Development Activities, Providing Information to Authorized Persons, Institutions and Organizations, Execution of Deletion, Storage and Archive Activities, Execution of Communication Activities, Planning of Human

METHODS OF COLLECTING PERSONAL DATA	Your personal data is collected by physical or electronic methods and means.
INFORMATION ON INFORM	IATION SECURITY
PROCESSED PERSONAL DATA	PROCESSING PURPOSES
 IP Address Information Website Login and Exit Information Electronic Communication Records Transaction Information 	Management and Execution of Student Requests and Complaints, Execution of Information Technologies, Information Security and Account Management Processes, Execution of Educational Activities, Execution of Business Activities, Execution of Activities in Compliance with the Legislation, Control of Business Activities, Execution of Access Authorizations, Execution of Storage and Archive Activities, Follow-up of Legal Affairs and Execution, Providing Information to Authorized Persons, Institutions and Organizations, Ensuring the Security of Movable Property and Resources, Ensuring the Security of Data controller Operations.
LEGAL BASIS FOR PROCESSING PERSONAL DATA	Your personal data is processed, in line with the realization of the abovementioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons; • That the processing is expressly stipulated in the law • That it is obligatory for the data controller to fulfill their obligations and in situations not included in legal obligations • That the data processing is obligatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the Data Subject.
METHODS OF COLLECTING PERSONAL DATA	Your personal data mentioned above are collected through web applications, mobile applications, Information systems and electronic devices (e.g. telecommunications infrastructure, computers and phones), cookies, third-party cookies (e.g. Google Analytics) and other documents declared by you.
INFORMATION ON PHYSICAL SECURITY	
PROCESSED PERSONAL DATA	PROCESSING PURPOSESS
CCTV Camera Recordings	Providing Physical Space Security, Carrying out Internal Audit/Investigation/Intelligence Activities, Carrying out Occupational Health/Safety Activities, Carrying out Storage and Archive Activities, Providing Information to Authorized Persons, Institutions and Organizations.
LEGAL BASIS FOR PROCESSING PERSONAL DATA	Your personal data is processed, in line with the realization of the above-mentioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons;

	That the 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.		
METHODS OF COLLECTING PERSONAL DATA	Your personal data mentioned above are collected through security cameras on the university premises.		
AUDIO-VISUAL RECORD IN	AUDIO-VISUAL RECORD INFORMATION		
PROCESSED PERSONAL DATA	PROCESSING PURPOSES		
Audio/Video DataPhotograph	Execution of Academic and Social Activity Processes, Student Relations Development and Orientation Studies, Training Activities, Business Activities, Planning and Execution of Corporate Communication and Public Relations Processes, Management and Execution of Emergency Processes, Execution of Health Center Processes, Execution of Occupational Health and Safety Processes, Management and Execution of Graduation and Alumni Association Processes, Execution of Activities in Compliance with the Legislation, Execution of Communication Activities, Organization and Event Management, Social Responsibility and Civil Society Activities, Execution of Sports Organizations and Sporting Activity Processes, Execution of Deletion, Storage and Archive Activities.		
LEGAL BASIS FOR PROCESSING PERSONAL DATA	Your personal data is processed, in line with the realization of the above-mentioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons; • That it is expressly stipulated in the law • That it is obligatory for the data controller to fulfill their legal obligations • That there is express consent		
METHODS OF COLLECTING PERSONAL DATA	Your personal data is collected by physical or electronic methods and means.		
INFORMATION ON FAMILY MEMBERS			
PROCESSED PERSONAL DATA	PROCESSING PURPOSES		
 Names and Surnames of Family Members TR Identity Numbers of Family Members Educational Status and Institutional Information of Family Members 	Planning and Execution of Student Registration Processes, Management and Execution of Scholarship Processes, Execution of Work & Study Processes, Planning and Execution of all Dormitory and Accommodation Processes including Dormitory Registration, Execution of Business Activities, Management and Execution of Financial and Accounting Processes, Management and Execution of Emergency Processes, Execution of Health Center Processes, Execution of Contract Processes, Follow-up and Execution of Legal Affairs, Execution of Deletion, Storage and Archive Activities.		

 Documents Showing the Financial Status of the Family Contact Information of Family Members 	
LEGAL BASIS FOR PROCESSING PERSONAL DATA	Your personal data is processed, in line with the realization of the above-mentioned purposes by the University, as specified in Article 5 of the KVKK based on the following legal reasons; • That the data processing is expressly stipulated in the law • 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, • That it is obligatory for the data controller to fulfill its legal obligation • That the data processing is obligatory for the data controller, provided that it does not harm the fundamental rights and freedoms of the Data Subject.
METHODS OF COLLECTING PERSONAL DATA	Your personal data is collected by physical or electronic methods and means.
INFORMATION ON LEGAL	TRANSACTIONS
INFORMATION ON LEGAL PROCESSED PERSONAL DATA	TRANSACTIONS PROCESSING PURPOSES
PROCESSED PERSONAL	
PROCESSED PERSONAL DATA • Information in Correspondence with Judicial Authorities • Information in Correspondence with Administrative Authorities • Information in Case Files • Information within the scope of Warnings/	PROCESSING PURPOSES Follow-up of Administrative Discipline and Investigation Processes, Follow-up and Execution of Legal Affairs, Follow-up of Contract Processes, Execution of Internship Processes, Informing Authorized Persons, Institutions and Organizations, Execution of Activities in Compliance with the Legislation, Carrying out of Storage and Archive Activities, Carrying out Internal Audit /

COLLECTING PERSONAL	rsonal data is collected by physical or electronic methods and means.
DATA	

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 are deemed to be special categories of personal data.

Data controller should provide for suitable and specific measures for processing special categories of personal data to safeguard the fundamental rights and the interests of the data subject.

PRIVATE PERSONAL DATA	
HEALTH INFORMATION	
PROCESSED PERSONAL DATA	PROCESSING PURPOSES
 Blood Group Information Disability Information Health Report Vaccine Information Health Data including Disease and Treatment Information Devices Used and Prosthesis Information 	Planning and Execution of Student Registration Processes, Planning and Execution of all Dormitory and Accommodation Processes, Management and Execution of Emergency Processes, Execution of Health Center Processes, Execution of Occupational Health and Safety Processes, Execution of Activities in Compliance with the Legislation, Execution of Deletion, Storage and Archive Activities, Protection of Public Health, Protection of Public Security and Public Order, Execution of Preventive Medicine Services and Management of Health Services.
LEGAL BASIS FOR PROCESSING PERSONAL DATA	The University processes your health data for the purposes stated above in accordance with Article 6 of the Law on the Protection of Personal Data (KVKK), which includes: - Conducting preventive medicine, medical diagnosis, treatment, and care services, as well as planning and managing healthcare services and their financing, - The necessity of establishing, exercising, or protecting a right. The processing of your health data, other than the limitations set in Article 6 of the KVKK, will only take place based on your explicit consent.
METHODS OF COLLECTING PERSONAL DATA	Personal data is collected through electronic methods and tools.

CRIMINAL CRIMINAL AND SECURITY MEASURES INFORMATION	
PROCESSED PERSONAL DATA	PROCESSING PURPOSES
• Criminal Records (This document will be obtained for students who make registration for dormitory or who will be involved in work & study processes, and this data processing and purposes are only apply to these students.)	Management and Execution of Scholarship Processes, Execution of Work & Study Processes, Execution of Business Activities, Execution of Activities in Compliance with the Legislation, Execution of Contract Processes, Follow-up and Execution of Legal Affairs, Execution of Internship Activities and Informing Authorized Persons, Institutions and Organizations, Execution of Deletion, Storage and Archive Activities, Planning of Human Resources Processes.
LEGAL BASIS FOR PROCESSING PERSONAL DATA	The University processes your health data for the purposes stated above in accordance with Article 6 of the Law on the Protection of Personal Data (KVKK), which includes: - Conducting preventive medicine, medical diagnosis, treatment, and care services, as well as planning and managing healthcare services and their financing, - The necessity of establishing, exercising, or protecting a right. The processing of your health data, other than the limitations set in Article 6 of the KVKK, will only take place based on your explicit consent.
METHODS OF COLLECTING PERSONAL DATA	Personal data is collected through electronic methods and tools.

5. To Whom and For What Purpose the Processed Personal Data Can Be Transferred

In transfering of your personal data, the University complies with the regulations in Article 8 of the KVKK and takes all kinds of technical and administrative measures to ensure data security during and after the transfering process.

- Your personal data may be transferred to Koç Holding, its group companies, partner institutions or official
 institutions and organizations within the scope of the purposes listed above and when necessary for the
 University to fulfill its legal obligations or in line with your express consent.
- Your personal data is transferred upon request with persons expressly authorized in the legislation within the scope of legal regulations. In addition, your personal data will be transferred with authorized persons or institutions upon the request from court or authorized administrative authorities.
- Your personal data will be transferred with third parties who process your data in order to fulfill the obligations within the scope of your relationship with the University (for example, transfering your health data with our workplace doctor when necessary, etc.).

- Your personal data (including special categories of personal data) may be transferred with third parties in order to fulfill the obligations within the scope of your relationship with the University or when necessary (for example, transfering with the named persons for emergencies, etc.).
- Your personal data could be transferred with real person or legal third parties who provide scholarships to you for the purpose of carrying out scholarship processes.
- Your personal data will be transfered with the University's Suppliers for the following purposes: Execution of Academic and Social Activity Processes, Student Relations Development and Orientation Studies, Educational Activities, Business Activities, Planning and Execution of Corporate Communication and Public Relations Processes, Management and Execution of Graduation and Alumni Association Processes, Execution of Communication Activities, Organization and Event Management, Social Responsibility and Civil Society Activities.
- Your personal data is transferred with Koç University Alumni Association, with your explicit consent and after your graduation.
- Your personal data may be shared with our international partner institutions for the purpose of conducting exchange program processes.
- Your identity, contact, and information security data, along with the necessary data for access control and application management, may be shared with Microsoft Ireland Operations Limited and Zoom Video Communications, Inc., within the scope of your explicit consent, for the use of office programs and tools, data analytics, instant messaging and video conferencing applications, and software and applications developed for online file storage and management.

6. Rights of the Data Subject

Article 11 of the LPPD issues some rights for each real person whose personal data is processed and requires the data controllers to inform the data subjects on such rights under the obligation of inform. These rights are comprised of;

- the right to obtain from the controller confirmation as to whether or not personal data concerning him or
 her are being processed, and, where that is the case, access to the personal data and the following
 information; the purposes of the processing and whether the personal data is used in line with such
 purposes, the recipients to whom the personal data have been or will be disclosed both domestically and
 in abroad,
- the right to request from the controller rectification of personal data if the personal data have been processed in an incomplete and wrong manner,
- the right to request the deletion or destruction of personal data if the grounds permitting the processing of personal data do no longer exist within the scope of Article 7 of the LPPD,
- the right to request the notification of the third parties whom the personal data are transferred to regarding the rectification if the personal data have been processed in an incomplete or wrong manner or the deletion or destruction of personal data in accordance with Article 7 of the LPPD,
- the right to object to any adverse result that occurs exclusively from analyzing the processed personal data via automatic systems and right to claim compensation if any damage is incurred due to unlawful processing of personal data.

The University will conclude your requests within this scope free of charge, as soon as possible and within thirty days at the latest, depending on the nature of the request.

7. How Do We Protect?

The protection of your personal data collected and processed by University is provided through preventing unauthorized persons to access the data and by taking all necessary technical and administrative measures in order to make sure our personnel do not suffer from any violation, by ensuring the use of softwares by our University in our operations are up to standards, by taking due care in choosing the third parties which we work with, by training our employees in this regard and by ensuring the compliance with the data protection policy within the University.

8. Application and Right to Obtain Information

In case you wish to exercise one of the rights explained above granted under Article 11 of the LPPD, you may apply to our University. This application should be made in writing or through other methods determined by the Personal Data Protection Board.

Please hand in your application;

- By sending e-mail to <u>kisiselverilerim@ku.edu.tr</u>,
- By sending an e-mail from your e-mail address to the University's registered e-mail address with secure electronic signature or mobile signature,
- By University's address via public notary or certified mail,
- By University's address via personal application with handwritten signature.

Your applications delivered to our University through the abovementioned methods in accordance with Article 13 sub-section 2 of the LPPD, shall be answered within 30 (thirty) days upon receipt by our University. Our reply shall be sent either in writing or through electronic means.