

CLARIFICATION TEXT CONCERNING THE PROCESSING OF PERSONAL DATA

As Global Communities Inc. ("**Global Communities Inc. Turkey Representative**") our primary principles are made of respecting ethical values, protection of privacy, ensuring protection of information security along with protection of fundamental rights and freedoms. To fulfill our obligation to inform you as a Data Controller by virtue of Article 10 of the Personal Data Protection Law No. 6698 ("**KVKK**"), we as Global Communities Inc. (and through Global Communities Inc. Turkey Representative) would like to give you information on the following explanations regarding the processing and protection of your personal data and special categories of personal data.

Global Communities Inc. permits everyone to provide feedback to (1) facilitate compliance with legal obligations, donor institution obligations its internal operations and policies, (2) to ensure the security of the Association (3) to eliminate risks, (4) to ensure quality and compliance of the aid, procurement, and services provided within Syria and (5) to resolve participant complaints (program participants, relatives of program participants, people who are not themselves program participants but live in the region where humanitarian aid/service is provided, people who have applied to Global Communities Inc. to become program participants, members of local government employees, consultants, suppliers of Global Communities Inc., subcontractors and employment candidates) (such items "Complaint"). Complaints may be received via SMS, phone calls, WhatsApp communication, or e-mail,. Based on the content of the complaint given by the complainant, the following categories of personal data will be processed electronically or physically through automated and/or non-automated security and information systems:

- Identity Information (Name and surname, gender, TR ID number or foreign ID number, Syrian ID number, mother's name, father's name, date of birth, marital status, ID card, marriage certificate, identity register copy, driver's license and/or passport photocopies)
- Contact Information (Address, phone number or e-mail address)
- Request-Complaint Evaluations
- Voice Recording, Video or Photo of Travel/Border Gate Documents Sent via WhatsApp or E-mail to Support/Explain the Complaint

The above listed categories of your personal data that may be processed are listed below (only the information required for the solution and recording of your complaint will be requested and based on the content of your complaint only those which are shared with you will be processed).

Your personal data shall be shared with official bodies and institutions, and relevant Global Communities Inc. units to the extent necessary to achieve the above-mentioned purposes by ensuring your data security and taking the necessary precautions by our Association, or as may be required by law or contract. Global Communities Inc. to funders to the extent required by law, regulation, or contract.

Legal Grounds For Processing Of Personal Data And Collection Method

Your personal data is collected, used, recorded, stored, and processed by our Association following the law and the rules of honesty within the framework of proportionality and in connection with and limited to the legitimate purposes listed above by providing written information to personal data owners clearly and understandably and if necessary, by obtaining their explicit consent.

Your personal data is processed within the framework of the following legal reason/s listed under Article 5/2 of the KVKK:

- It is necessary for compliance with a legal obligation to which the data controller is subject (Article 5/2(ç) of the KVKK).
- Data processing is necessary for the establishment, exercise or protection of any right (Article 5/2(e) of the KVKK).
- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (Article 5(2)(f) of the KVKK).

Domestic Transfer of Personal Data

It is possible to transfer personal data without the consent of the data owner concerned in cases stipulated under Article 5 and Article 6 of the KVKK.

Personal data processed by Global Communities Inc. following the conditions stipulated in other relevant legislation by taking the security measures specified in the legislation; unless otherwise regulated by the law or other relevant legislation, your personal data will be shared with Turkish public institutions and organizations (AFAD, Kilis Provincial Directorate of Agriculture and Forestry) due to our legal obligations, our Implementing Partners, Third Party Monitoring Organizations or to parties who are authorized by Global Services regarding your participation to this project and to Associations under the umbrella of Global Communities Inc.. The purpose and legal reasons for transferring your personal data are listed below:

The transfer of your personal data is based on the purposes and legal reasons listed under the heading of “**Legal Grounds For Processing Of Personal Data And Collection Method**” which is listed above.

Transfer of Personal Data Abroad

Our Association may transfer personal data to the above-mentioned third parties in Turkey as well as process the data in Turkey or process and store the data outside of Turkey. As stated above, our Association will transfer the processed data abroad in accordance with the conditions stipulated in the Law and other relevant legislation by taking the security measures specified in the legislation. To carry out our Association’s activities in the most efficient way and to benefit from the opportunities of technology, we transfer your personal data abroad by taking the necessary technical and administrative measures via cloud computing technology.

In accordance with Article 9 of the KVKK and as a rule, we seek the explicit consent of data owners for the transfer of personal data abroad. In this respect and based on your explicit consent:

- Your processed personal data is transferred to us in the United States of America,
- Your processed personal data is transferred to other Global Communities Inc. Associations operating abroad.
- Your processed personal data is transferred to Global Communities Inc. employees who are working abroad,
- Your processed personal data is transferred to Global Communities Inc.’ funders or their designees, to the extent required by law or contract.
- Your process personal data may be processed to third parties outside of Turkey to the extent required by law

Your Rights and Our Contact Information Pursuant to Article 11 of the KVKK

In accordance with Article 11 of the KVKK, you have the right to obtain information about your personal data by contacting Global Communities Inc. You can access to more detailed information about your Personal Data and to the application form should you wish to obtain information about personal data from our Company’s e-mail address kvkkiletisim@globalcommunities.org.

Data Controller

Global Communities Inc. Turkey Representative

15 Temmuz Mah. 148031 Nolu sok. No:3 A ve B Blok Sehitkamil/Gaziantep

Tel: 0342 290 3183

Web Site: <https://globalcommunities.org.tr/>

Gaziantep İl Dernekler Müdürlüğü/ Kütük No: US-27-001-097

I read and understood.