

## CLARIFICATION TEXT CONCERNING THE PROCESSING OF PERSONAL DATA

As Global Communities, Inc. Türkiye Representative ("**Global Communities**") 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. In order 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. Türkiye Representative (and through Global Communities, Inc. Türkiye Representative 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. Türkiye Representative' Feedback Mechanism encourages everyone to provide feedback for the purposes of compliance with legal obligations, donor institution obligations along with its own internal operations and policies, to ensure security of the Association and to eliminate risks, to ensure quality and compliance of the aid and services provided within Syria and the recruitment and purchasing processes and also 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. Türkiye Representative to become program participants, members of local government employees, consultants, suppliers of Global Communities, Inc. Türkiye Representative, subcontractors and employment candidates). These feedbacks (complaints, questions and requests, satisfaction questionnaire) are received via SMS, phone calls, WhatsApp communication, e-mail or through face-to-face meetings.

Based on the content of the feedback given by the feedback owner, your personal data in the following categories of personal data, which is shared by you, will be processed electronically or physically through automated and/or non-automated security and information systems.

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

- 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)
- Disability Information

- Number of Family Members
- Request-Complaint Evaluations
- Income/Asset/Deed/Rent Information
- Resume
- Educational Status
- Voice Recording, Video or Photo of Travel/Border Gate Documents Sent via WhatsApp or E-mail to Support/Explain the Feedback

Your personal data shall be shared with official bodies and institutions and relevant Global Communities, Inc. Türkiye Representative units to the extent necessary to achieve the above-mentioned purposes by ensuring your data security and taking the necessary precautions by our Association.

### **Processing of Special Categories of Personal Data**

Your personal data listed below are special categories of personal data by virtue of Article 6 of the KVKK and such data requires explicit consent of the data owner in order to be processed or shared with other parties because this data cannot be considered within the scope of exceptions listed under Article 5 of the KVKK:

- Disability Information

This data in question is accessed by the company from which we receive information technologies support provided that your data security and necessary precautions are taken and granted by Global Communities, Inc. Türkiye Representative. The processing of your personal data is based on your “explicit consent” given under Article 6 of the KVKK.

### **Legal Grounds For Processing Of Personal Data And Collection Method**

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

Your personal data is processed within the framework of the following legal reasons 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. Türkiye Representative in accordance with 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. Türkiye Representative. The purpose and legal reasons for transferring your personal data are listed below:

- The transfer of your personal data, other than special categories of data (your disability information) are 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.
- The transfer of your special categories of data (your disability information) is based on your **“explicit consent”** by virtue of Article 6/1 of the KVKK.

### **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. In order 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. Türkiye Representative Associations operating abroad.
- Your processed personal data is transferred to Global Communities, Inc. Türkiye Representative' funders or their designees, to the extent required by law or contract.

#### **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. Türkiye Representative. 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](mailto:kvkkiletisim@globalcommunities.org).

#### **Data Controller**

Global Communities, Inc. Türkiye Representative

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

Tel: 0342 290 3183

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

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

*I read and understood.*