



TUNA

AVUKATLIK VE DANIŐMANLIK

**PERSONAL DATA
PROTECTION POLICY**

Introduction

This Policy document constitutes the Tuna Law & Consultancy's , having its registered office at the following address "Güvenevler Mahellesi , Cinnah Cd. No:38/6, 06690 Çankaya/Ankara -Turkey"" (hereinafter referred as the "Tuna" or "Us, We", or Tuna Law Firm") Data Protection Policy and aims to provide information relating to purposes for which we gather and process your personal data pursuant to Law No 6698 on Personal Data Protection (hereinafter referred as "Law", it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We are subject to the provisions of Law No 1136 on Profession of Attorneys and bound by our duty to professional secrecy. When we use your personal data we are regulated under the Law No 6698 and General Data Protection Regulation (GDPR) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant Turkish and EU legislation and our professional duty of confidentiality.

Scope

This Policy applies to all our partners, counsel, associates and general staff and sets out Tuna Law Firm's global policy in respect of the rights of individuals with respect to their Personal Information and the responsibilities of partners, counsel, associates, general staff and the firm with respect to access to and use of that Personal Information. This policy applies to all Personal Data we process, regardless of the media on which that data is stored or whether it relates to previous or current employees, workers, employees of organizations we cooperate with, customers, clients or supplier contacts, website users or any other Data Subject whose personal data may be gathered, registered, stored, processed, used, transferred by us.

Definitions

For the purpose of this Policy the following definitions shall apply:

We, us, our	Tuna Law & Consultancy
Personal data	any personal information or data relating to a living individual and from which that individual is identifiable. This may include: name, date of birth, address and title, payroll details, financial details, employment or other references about him/her, a description in information from which the individual can be identified, biometric and photographic data, and other biographical information about that individual.
Processing	any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

Controller	the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
Processor	a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
Sensitive Personal Data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation
Visitors	Real persons who visit our office or our website for any reason
Client	Person who uses or has used the services we offer, regardless of whether there is any contractual relationship with our office.
Prospective Client	Real persons who have requested or showed interest in our services or who may be considered as such pursuant to rules of commercial practice and bona fide to which they may have this interest.

Personal data we collect about you

Categories of personal data we may collect and process while we provide our legal services or represent our customers before relevant bodies are as follows:

- Data we may collect in relation with power of attorney you grant us or in case you assign us as your agent: Your name, address and telephone number, information such as date of birth or passport / ID card and MERNIS data that may help us to identify you, electronic contact information such as e-mail address
- Information relating to the matter in which you are seeking our advice or representation
- Details of your spouse/partner and dependants or other family members, e.g. if you instruct us on a family matter or a will
- Your employment status and details including salary and benefits, e.g. if you instruct us on matter related to your employment or in which your employment status or income is relevant
- Details of your pension arrangements, e.g. if you instruct us on a pension matter or in relation to financial arrangements following breakdown of marriage
- Your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), e.g. if you instruct us on matter related to your employment or in which your employment records are relevant
- Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs, e.g. if you instruct us on discrimination or mobbing claim
- Personal identifying information, such as your hair or eye colour or your parents' names, e.g. if you instruct us to incorporate a company for you.
- Your medical records, e.g. if we are acting for you in a personal injury claim or for court of protection purposes.

- Information to enable us to undertake a financial review for reasons such as debt collection and garnishment via official information systems such as Takbis for real estate proprietorship, payroll data provided by social security institutions and vehicle registry services.
- Your financial details such as IBAN number so far as relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction
- Your social security and tax payer details if it is relevant for the instructions you give us
- Your bank and/or building society details if it is relevant for the instructions you give us

Aforementioned personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How we collect your personal data?

We collect most of this information directly from you; however, we may also collect information via third parties mentioned below:

- From publicly accessible sources, e.g. UYAP, judiciary information system for real estate property details, social security details, vehicle registry and residency address details.
- When it is necessary for us to follow your case or implement your instructions or for the establishment, exercise or defence of legal claims, directly from a third party, e.g.:
 - your bank or building society, another financial institution or advisor;
 - consultants and other professionals we may engage in relation to your matter;
 - your employer and/or trade union, professional body or pension administrators;
 - your doctors, medical and occupational health professionals;
- via our website—we use cookies on our website (for more information on cookies, please see our cookies policy at: [Our Cookie Policy](#))
- via our information technology (IT) systems, e.g.: case management, document management and time recording systems; automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.

How and why we use your personal data?

We only use your personal data if we have a proper reason for doing so, pursuant to data processing principles stipulated in Article 4 of the Law and conditions stipulated in Article 5 of the Law which are listed below:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we process your personal data for and our reasons for doing so:

Purposes for which we process your data	Our reasons for processing
To provide legal services to you	For the performance of our contract with you or to take steps at your request before entering into a contract pursuant to Article 5(2)(c) of Law and Article 6(1)(b) of GDPR
-Conducting checks to identify our clients and verify their identity -Screening for financial and other sanctions or embargoes -Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations pursuant to Article 5(2)(a) of Law and Article 6(1)(c) of GDPR
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations pursuant to Article 5(2)(a) of Law and Article 6(1)(c) of GDPR
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you pursuant to Article 5(2)(f) of Law and Article 6(1)(f) of GDPR
Operational reasons, such as improving efficiency, training and quality control, e.g., archive activities, contract processes, procurement of goods / services and post-service activity processes, training activities, etc.	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you pursuant to Article 5(2)(f) of Law and Article 6(1)(f) of GDPR
For the performance of selection and placement of interns and prospective employees and to fulfil legal obligations arising from the employment contract and labour law	To comply with our legal and regulatory obligations pursuant to Article 5(2)(a) of Law and Article 6(1)(c) of GDPR
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information pursuant to Article 5(2)(f) of Law and Article 6(1)(f) of GDPR
	To comply with our legal and regulatory obligations
Statistical analysis to help us manage our practice, e.g. in relation to our client base, work type or other efficiency measures	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information

	pursuant to Article 5(2)(f) of Law and Article 6(1)(f) of GDPR
Preventing unauthorised access and modifications to systems such as our web site and computer systems.	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you pursuant to Article 5(2)(f) of Law and Article 6(1)(f) of GDPR
Updating client records	For the performance of our contract with you or to take steps at your request before entering into a contract For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services To comply with our legal and regulatory obligations
Statutory returns	To comply with our legal and regulatory obligations pursuant to Article 5(2)(a) of Law and Article 6(1)(c) of GDPR
Ensuring safe working practices, staff administration and assessments, e.g., occupational safety, internal audits, disciplinary procedures, compliance with professional code of ethics	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
External audits and quality checks, eg., for accreditation and the audit of our accounts by certified accountants and competent public authorities	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards pursuant to Article 5(2)(f) of Law and Article 6(1)(f) of GDPR To comply with our legal and regulatory obligations pursuant to Article 5(2)(a) of Law and Article 6(1)(c) of GDPR

The above table does not apply to special category personal data, which we will only process with your explicit consent.

Who we share your personal data with?

We routinely share personal data with following parties:

- professional advisers who we instruct on your behalf or refer you to, e.g. barristers, medical professionals, accountants, tax advisors or other experts;
- other third parties where necessary to carry out your instructions, eg your mortgage provider or land registry offices

- courts, tax offices and customs authorities;
- credit reference agencies;
- our insurers and brokers;
- our IT providers
- external auditors, e.g. in relation to the audit of our accounts;
- our bank(s);

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible.

The recipient of the information will be bound by confidentiality obligations.

Where your personal data is held?

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see ‘Who we share your personal data with’).

Some of these third parties may be based outside the territory of Turkey. For more information, including on how we safeguard your personal data when this occurs, see below: ‘Transferring your personal data abroad’.

How long your personal data will be kept?

We will keep your personal data after we have finished advising or acting for you. We will do so for one of the reasons listed below:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.

When it is no longer necessary to retain your personal data, we will delete it.

Transferring your personal data abroad

To deliver services to you, it is sometimes necessary for us to share your personal data abroad, e.g.:

- with your and our service providers located abroad
- if our customers are based abroad;
- where there is an international dimension to the matter in which we are advising you.

These transfers are subject to special rules under data protection legislation.

If relevant countries do not have the same data protection laws as the Republic of Turkey and EU, we will ensure the transfer complies with data protection law and all personal data will be secure via data processing agreements pursuant to Article 9 of the Law No. 6698.

If you would like further information please contact us (see ‘How to contact us’ below).

What rights do you have regarding your personal data?

We acknowledge and respect the rights afforded to Data Subjects under the Article 11 of the Law including following rights:

a) the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice;

b) the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Code of Practice for Subject Access Request which is available on our website as outlined above or paper copies can be obtained by mail to our correspondence address mentioned above for the attention of Data Protection Liaison Officer whose contact details are shown at the end of this privacy notice.

c) the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it;

d) the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it;

e) the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct;

f) the right to portability. You may transfer the data that we hold on you for your own purposes;

g) the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests;

h) the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision-making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

i) right to make a complaint

Finally, you can lodge a complaint with the supervisory authority responsible (KVKK) for compliance with personal data protection obligations. If your application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may file a complaint with the supervisory authority within thirty days starting from the notification of the response of the data controller, or within sixty days as of the application date, in any case. Please visit the following web site in order to obtain more information on how you can use your right to make a complaint: <https://www.kvkk.gov.tr/Icerik/2063/Sikayet-Hakki>

Data subjects can fill the Data Subject Application Form whose link can be found in our web site in order to exercise their rights in respect of their personal data. Applications must be send with documents that establish the identity of the data subject using one of the following modalities:

- fill the aforementioned form and deliver the wet signed copy by hand, via notary public or by registered mail to the following address “Güvenevler Mahellesi , Cinnah Cd. No:38/6, 06690 Çankaya/Ankara -Turkey”,
- fill the aforementioned form and attach a secure signature in accordance with the provisions of Law No 5070 on Electronic Signatures and e-mail it to “dpo@tunalawfirm.com”,

We reserve the right to request information from the applicant in order to verify the identity of the data subject and direct questions to data subject in order to clarify the matters specified in the application.

We reserve the right to not disclose any information which is legally privileged in accordance with professional secrecy rules.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We take reasonable technical and administrative measures to prevent unauthorized access, accidental data loss, deliberate deletion or damage of data in order to ensure the security of personal data which are summarized below:

- Technical measures considering state of the art of technology and costs are taken, the measures taken are periodically updated and renewed.
- Access and authorization technical solutions are implemented in accordance with the requirements determined on a need to know basis.
- The technical measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism, the issues that pose a risk are re-evaluated and the necessary technological solution is applied.
- Software and hardware, including virus protection systems and firewalls, have been installed
- We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Changes to this privacy policy

This personal data protection policy was last updated on 16/04/2021.

We may change this privacy policy from time to time.

How to contact us?

Please contact us and/or by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	Data Protection Officer's contact details
Güvenevler Mahallesi , Cinnah Cd. No:38/6, 06690 Çankaya/Ankara Telephone: +90 (0312) 427 97 97 Web Site: http://tunalawfirm.com/tr	dpo@tunalawfirm.com +90 (532) 568 02 74