



## Turkish Airlines Privacy Notice on Data Protection Regarding Health Procedures of Employees and Employee Candidates

### 1. Introduction

As a data controller, Türk Hava Yolları Anonim Ortaklığı (“THY”, “Company” or “We”) pays the utmost attention to the lawfulness of the processing of personal data relating to its employees and employee candidates.

This Turkish Airlines Privacy Notice on Data Protection Regarding Health Procedures of Employees and Employee Candidates (“Privacy Notice”) has been prepared in accordance with Article 10 of the Law on Protection of Personal Data No. 6698 (“Law”) and other relevant legislation, to ensure that your personal data is processed in a transparent manner and entirely under your control.

As Company, We want to inform you in detail with respect to processing of your personal data collected. In this respect, We provide you with information on which personal data We process, for what purposes and how long your data is kept, the third parties your data are shared with, your rights and ways to contact us.

For more detailed information on the processing of your personal data during the candidate processes, please visit <https://careers.turkishairlines.com/>, and to review employee privacy notices, please visit <https://webapps01.thy.com/KVKK/Site/index.html>. You can also review our Company's Registry (VERBİS) (<https://verbis.kvkk.gov.tr/>).

### 2. Which Personal Data We Process and How Do We Collect Your Personal Data?

General information regarding your personal data processed by THY is as follows:

- **Identity and Contact Information:** Name, surname, identity and passport information, gender, date of birth, Turkish ID No, personal registration/ID card information, social security number in the relevant country if you are a citizen of a different country, home address, e-mail address, telephone number, mobile phone number.
- **Health Data:** Health information processed by persons under the obligation of secrecy and authorized institutions and organizations for the purpose of national Occupational Health and Safety legislation, protection of public health, preventive medicine, conducting medical diagnosis, treatment and care services, planning and management of health services and financing, or within the scope of Civil Aviation health rules. This includes past health records, family health information, diagnosis/anamnesis, pregnancy information, birth notification, referral information, medications used, pathology/test/analysis results, disability information, child disability information, vaccination information, data required for leaves taken within the scope of health reports, necessary health data for the provision of certain rights, and information regarding tests performed for flight employee or other employee if deemed necessary by the workplace physician within the scope of civil aviation regulations.
- **Request/Complaint Management Information:** Information and records collected regarding requests and complaints conveyed to our company by you in a way that can be associated with the person, and information regarding reports where the results of these are evaluated by the relevant business units, etc.

Your personal data can be obtained by fully/partially automated or non-automated means from the beginning of your job interview or relationship with THY, through printed documents (e.g., your submitted CV information or social security records), interviews conducted with you, forms (e.g., Entry/Periodic Examination Application Form), and in some cases, through digital areas and channels such as information transferred directly from public institutions, e-Nabız/Reçetem application (only if deemed necessary by the workplace physician/flight physician) or authorized



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hospitals of the Directorate General of Civil Aviation (“SHGM”), or online job application portals and online platforms specifically allocated to employees.

Your personal data is obtained in accordance with national and international legislation, especially the fundamental principles in Article 4 of the Law, and processed in accordance with Articles 5 and 6 of the Law.

### 3. For Which Purposes Do We Process Your Personal Data?

Your personal data may be processed in compliance with the Law for the following purposes:

- Meeting the security and safety requirements imposed on THY as an employer and airline carrier by national/international legislation and aviation rules, and the employee health criteria necessary for business conditions.
- Job entry and periodic examination procedures and their follow-up.
- Ensuring compliance with occupational health and safety rules, protection of public health, and carrying out public and private health insurance procedures.
- Carrying out activities in accordance with legislation, fulfilling obligations arising from the legislation We are subject to, and providing information to authorized institutions and organizations due to legislation.

### 4. What is Our Legal Basis For Processing Your Personal Data?

In accordance with the Law and/or international legislation, your personal data within the scope of health procedures can only be processed if at least one of the conditions specified in Articles 5 and 6 of the Law is present.

In this context, your personal data may be processed for the following purposes:

- Under Article 5 (2) (c) of the Law, it is necessary to process personal data belonging to the parties of the contract, provided that it is directly related to the evaluation of the job application, negotiation, establishment, and performance of the employment contract.
- Under Article 5 (2) (ç) of the Law, fulfilling our legal obligations as an airline carrier and employer.
- Under Article 6 (3) (b) of the Law:  
Being explicitly stipulated in laws and secondary regulations to which we are subject, such as the Labor Law No. 4857, Occupational Health and Safety Law No. 6331, Turkish Civil Aviation Law No. 2920, and the Regulation on the Duties, Authorities, Responsibilities, and Training of Workplace Physicians and Other Health Employee.
- Being necessary for the protection of public health, preventive medicine, conducting medical diagnosis, treatment, and care services, and planning and management of health services and financing.
- Under Article 6 (3) (c) of the Law, it is mandatory for the protection of the life or physical integrity of the person who is unable to disclose their consent due to actual impossibility or whose consent is not given legal validity, or of another person.
- Under Article 6 (3) (d) of the Law, it is mandatory to process data for the establishment, exercise, and protection of rights granted to employees or employee candidates by laws, administrative regulations, or the employer, especially regarding retirement, health, and social insurances.
- Under Article 6 (3) (e) of the Law, it is necessary for persons under the obligation of secrecy or authorized institutions and organizations for the protection of public health, preventive medicine, conducting medical diagnosis, treatment and care services, and planning, management and financing of health services.

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- Under Article 6 (3) (f) of the Law, it is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance.

### 5. To Whom We Transfer Your Personal Data and Why?

In some cases, We may transfer your personal data processed by us to third parties residing within borders of Turkey or abroad, primarily within the framework of national and international legislation, including Articles 8 and 9 of the Law.

The categories of third parties to whom we may transfer your data are as follows:

- Administrative and judicial authorities authorized in accordance with the relevant legislation.
- SHGM authorized health institutions.
- Requirements within the scope of Labor and Social Security Legislation.
- National and international aviation authorities such as SHGM, IATA, and the Ministry of Family, Labor and Social Services, if required by legislation.

### 6. What are Your Rights as Data Subject?

In accordance with Article 11 of the Law, data subjects are entitled to the following rights:



Learn whether data relating to you are being processed.



Request further information if personal data relating to you have been processed.



Learn the purpose for the processing of personal data and whether data are being processed in compliance with such purpose.



Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred.



If we have processed your personal data incompletely or incorrectly, you can request their rectification and request that these rectifications be communicated to third parties to whom we have transferred your personal data.



Request deletion or destruction of personal data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law and other applicable laws and request such process to be notified to third persons to whom personal data is transferred.



Object to negative consequences about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means.



Demand compensation for the damages he/she has suffered as a result of an unlawful processing operation.



# TURKISH AIRLINES

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To exercise your rights listed above, you can reach out to us using the contact information below. We will respond to your application as soon as possible, depending on its nature, and within thirty days at the latest. Your applications are generally answered free of charge; however, if an additional cost arises, we reserve the right to charge you a fee according to the tariff determined by the Personal Data Protection Board.

### 7. Data Controller and Contact Information

Türk Hava Yolları A.O. Genel Yönetim Binası

Yeşilköy Mah. Havaalanı Cad.

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+90 212 463 63 63

If you are a candidate: [YURTICIISTIH DAM@THY.COM](mailto:YURTICIISTIH DAM@THY.COM) / [KOKPITISTIH DAM@THY.COM](mailto:KOKPITISTIH DAM@THY.COM) / [KABINISTIH DAM@THY.COM](mailto:KABINISTIH DAM@THY.COM)

If you are an employee: [CALISANDESTEK@THY.COM](mailto:CALISANDESTEK@THY.COM)