

PROCEDURE FOR RECEIVING, EVALUATING AND RESPONDING THE APPLICATIONS OF THE DATA OWNER

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This procedure for receiving, evaluating and responding the applications of the data owner (the "Procedure") was issued in order to determine the methods and principles on the activities and processes related with receiving, evaluating and responding the applications made to Oriental Link Tütün Ticaret Anonim Şirketi (Oriental Link Tobacco Trade Joint Stock Company, "the Company") by the owners of the data for being informed.

The activities and processes related with receiving, evaluating and responding the applications by the owners of the data related with the personal data are performed according to this procedure, issued accordingly by the Company.

1. DEFINITIONS

Law:	Law on Protecting Personal Data no: 6698
Institution:	Personal Data Protection Institution
Board:	Personal Data Protection Board
Employees:	Company employees
Data processor:	The real or legal person, including but not limited to: suppliers, consultant companies, which processes the personal data on behalf of him depending on the authority granted by the Company in a way Defined in the Law.
Owner of the data:	The real person, the personal data of whom is processed.
Personal data:	All kinds of information related with a real person, the identity of whom is known or can be found, as long as it is in the scope of the law.
Application responding unit:	The team of the company, responsible for responding to the applications.
Data inventory:	The document located in the common server area of the Company, in which the inventory of all data processing processes and purposes of the company are kept.
Process:	Each data processing activity included in the data inventory.

2. RECEIVING THE APPLICATION

2.1. Type of the application

The data owners shall convey their applications for getting information on the personal data collected by the company and using the rights stated in the article 11 of the Law to the contact person of the company in written according to the article 13 of the Law.

Accordingly, the applications to be done by the owners of the data can be done in written by the ways below:

Personally to the address: Yedi Eylül Mah. Bige Özgener Cad. No:4 Torbalı, İzmir, ensuring that your identity is verified, or

To the mail address: orientallink@hs01.kep.tr, which is the KEP address of the company from your personal KEP address or

Via the formal method through notary.

2.2. The content of the application

In order to evaluate the requests of the data owner, first of all, it shall be determined whether the data owner is the owner of the personal data processed before the company or not. With this respect, it is required that the identity information of the data owner is stated clearly and according to the truth for the applications to be made to our Company in the scope of the Law.

For the conditional requests, the owner of the data should give the information on how this condition takes place and convey the documents proving this claim to the company.

The applications not taken through the ways determined in this procedure, if the identity of the owner of the data is determined and if the information and/or documents requested for the application in the scope of the law by the Company are provided, the applications made through this way may be taken into consideration. Otherwise, the applications made may be rejected because of contradiction with the method.

The applications not carrying the characteristics stated in this article shall be evaluated; the owner of the data shall be in contacted with until the requested information is obtained; however in case that the information and/or documents requested are not procured by the owner of the data, the application of the data owner shall be rejected because of contradiction with the method.

3. OTHER SITUATIONS

3.1. Application made by the proxy or legal attorney

The applications to be made to the Company in the scope of the Law, in case that the official certificate is presented, shall be able to be made by the proxy or the legal attorney of the owner of the data.

3.2. Collective applications

It is possible that the applications to be made to the Company in the scope of the Law are done collectively in case that the conditions stated in the articles 2 and 3.1 of this procedure are fulfilled.

3.3. Application fee

In the Law, it is anticipated that the data officer concludes the request conveyed to him for free. However, it is stated that it is possible to make a pricing according to the principles to be determined by the Board in case that the procedure requires an extra cost. In this scope, in case that the conclusion of the applications to be made to the company requires any additional cost, the company may request a fee from the data owner.

4. APPLICATION EVALUATION PROCESS

In case that it is found out that there is information and/or document missing in the applications made by the owner of the data, this shall be notified to the owner of the data. In case that the information and/or documents requested are failed to be obtained by the owner of the data, the application of the data owner shall be rejected due to contradiction with the method.

In cases where it is not possible to answer the application of the data owner without sharing the personal data belonging to the third persons, the three step evaluation process below shall be applied by the Company:

It shall be assessed whether it is possible to answer without sharing the personal data belonging to the third person or not (e.g. deleting or blacking out the personal data belonging to the third person).

It shall be determined whether the third person consents clearly sharing the personal data or not.

In case that the clear consent of the third person can't be obtained, it shall be assessed whether the personal data in question can be shared without having clear consent or not.

In case that it is not possible to conclude the application without sharing the data of the third person, first of all, the way of obtaining clear consent from the data owner, the personal data of whom is had to be shared, shall be resorted. In case that the third persons doesn't consent sharing his data, the application shall be answered completely cleaning out the information of the third person.

In case that the third person, the personal data of who is to be shared, can't be accessed, the maximum care and sensitivity shall be cared by the Company for not sharing the information containing the personal data of the third person. With this way, if it is necessary, the personal data belonging to the third persons shall be able to be shared.

5. EVALUATION TERMS OF THE APPLICATIONS

The requests of the data owner shall be evaluated and concluded as soon as possible and within at most thirty (30) days.

The applications to the company shall be directed to the related department of the company within maximum three (3) days; the researches to be done by the department to which the application was directed shall be concluded within maximum one (1) week.

6. ANSWERING THE APPLICATIONS

The applications done by the owner of the data to the Company, are answered by the contact person assigned before the Company and the information below is included in the responses related with the applications:

- Holder of the application, making the request,
- Requests,
- The information and documents obtained as a result of the requests,
- The date when the request is received,
- If extra information and document are requested related with the request, the dates of these requests and dates of receiving the related answers,
- The procedures done related with the request,
- The answers of the company for the requests,
- The date of answering the request
- Authorized signature.

The event records, created related with the related application, documents and the results are maintained in the electronic index, form on this topic. A copy of the written post is also kept in the archive.