

GEDS PERSONAL DATA PROTECTION POLICY 2019

ABSTRACT

This document introduces GEDS's data protection policy according to GDPR and KVKK

	GEDS KVKK and GDPR Policy	PAGE NO	2 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
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SUBJECT	PERSONAL DATA PROTECTION POLICY		

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02	1.09. 2019	Second Publishing

GEDS PERSONAL DATA PROTECTION POLICY

CONTENT

- 1. Definitions, Abbreviations,**
- 2. Introduction**
- 3. Purpose**
- 4. Scope**
- 5. Data Controller Representative and Lead Supervisory Authority**
- 6. Processing of Personal Data**
 - 6.1. Principles**
 - 6.2. Legal Basis for Data Processing Activities**
 - 6.3. Processing of Special Category Personal Data**
 - 6.4. Purposes of Data Processing**
 - 6.5. Process Guidance**
- 7. Privacy by Design**
- 8. Protection of Personal Data**
- 9. Categories of Personal Data**
- 10. Categories of Data Subject**
- 11. Transfer of Personal Data**
 - 11.1. Domestic Transfer of Personal Data**
 - 11.2. Cross-Border Personal Data**
 - 11.3. Transfer of Sensitive Personal Data**
 - 11.4. EU Citizens**
- 12. Taking Personal Data from Third Parties**
- 13. Internet Website**
- 14. Anonymisation and Pseudonymisation of Personal Data**
- 15. Individual Rights**
- 16. DPIA Document**
- 17. Data Breaches**
- 18. Trainings**

GEDS PERSONAL DATA PROTECTION POLICY

CONTENT

- 1. Definitions, Abbreviations**

	GEDS KVKK and GDPR Policy	PAGE NO	3 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTK.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

2. Introduction

We, GEDS Turkey, are a design and innovation consultancy and we provide assistance to our customers to develop human centric solutions by using design.

As GEDS, We process personal data of “Participants”, our customers, our customer’s staff, our employees, our suppliers, including our supplier’s staff to perform our work.

GEDS process personal data of both Turkish and EU citizens so we design our data processing activities inline with both Personal Data Protection Law of Turkey (KVKK), promulgated in Official Gazette No. 29677 dated 7 April 2016, the UK Data Protection Act 2018 of UK and EU General Data Protection Regulation (GDPR).

This policy is published on internet website of GEDS <https://www.geds.com.tr> for who may concern.

3. Purpose

We –as GEDS- are aware of our responsibility to protect personal data, security of which is considered as a basic human right and we place importance on privacy and security of your personal data.

This policy sets out our commitment to ensuring that any personal data, including special category personal data, which we process, is carried out in compliance with Personal Data Protection Law of Turkey (KVKK), the UK Data Protection Act 2018, EU General Data Protection Regulation (GDPR) and all the relevant Turkish, the UK and EU data protection legislation. We will call all these acts, regulations and relevant legislation “**data protection law**”.

As GEDS, we ensure that all the personal data processing is done in accordance with “data protection law” and good data protection practice is imbedded in the culture of our staff and our organisation.

4. Scope

This policy applies to all personal data collecting, processing and transferring activity carried out by GEDS and is part of GEDS compliance with “data protection law”.

All GEDS staff is expected to comply with this policy and failure to comply with this policy may lead to disciplinary action for misconduct, including dismissal.

5. Processing of Personal Data

5.1. Principles

GEDS complies with seven principles for the lawful processing of personal data. Processing includes the collection, organisation, structuring, storage, alteration, consultation, use, communication, combination, restriction, erasure or destruction of personal data. Broadly, the seven principles are :

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation

	GEDS KVKK and GDPR Policy	PAGE NO	4 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

When processing personal data, GEDS ensures that:

- It is processed lawfully, fairly, and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
- It is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
- It is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- It is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- It is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')
- It is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

GEDS will facilitate any request from a data subject who wishes to exercise their rights under data protection law as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

5.2. Legal Basis for Data Processing Activities

GEDS may collect or process your data only if,

- The data subject gives his or her explicit consent,
- There is a law about processing and collecting it,
- The processing is necessary for the performance of a contract with the data subject,
- To meet our legal compliance obligations
- To protect the data subject's vital interests

	GEDS KVKK and GDPR Policy	PAGE NO	5 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTK.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- To pursue our legitimate interests (or another's legitimate interests) which are not overridden because the processing prejudices the interests or fundamental rights and freedoms of data subjects. The specific legitimate interest or interests that GEDS is pursuing when processing personal data will need to be set out in relevant Privacy Notices.

5.3. Processing of Special Category Personal Data

Special Category Definition:

Special Category Personal Data is data revealing:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs,
- Trade union membership,

It also includes the processing of:

- Genetic data
- Biometric data for the purpose of uniquely identifying a natural person,
- Data concerning health
- Data concerning a natural person's sex life or sexual orientation
- Criminal convictions and offences including the alleged commission of offences or proceedings for offences or alleged offences

Processing of Special Category Personal Data

The processing of sensitive personal data by GEDS must be based on one of the following (together with one of the legal bases for processing non-sensitive personal data as listed above):

- The data subject has given explicit Consent
- The processing is necessary for complying with employment law;
- The processing is necessary to protect the vital interests of the data subject or another person where the data subject is physically or legally incapable of giving Consent;
- The processing relates to personal data which are manifestly made public by the data subject;
- The processing is necessary for the establishment, exercise or defence of legal claims;
- The processing is necessary for reasons of substantial public interest (provided it is proportionate to the particular aim pursued and takes into account the privacy rights of the data subject)

5.4. Purposes of Data Processing

	GEDS KVKK and GDPR Policy	PAGE NO	6 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

GEDS process personal data for these purposes:

- Personal Data Processing Objectives
- To investigate the needs and problems of people
- Conducting information security processes
- Carrying out selection and placement processes for candidate / trainee / student
- Carrying out the application process of the candidates
- Fulfillment of the obligations of employees arising from employment contract and legislation
- Conducting training activities
- Conducting activities in accordance with the legislation
- Execution of finance and accounting
- Conducting tests for companies / products / services
- Carrying out the assignment processes
- Monitoring and execution of legal affairs
- Conducting communication activities
- Planning human resources processes
- Taking and evaluating suggestions for improvement of business processes
- Carrying out the procurement process of goods / services
- Carrying out production and operation processes of goods / services
- Execution of customer relationship management processes
- Conducting customer satisfaction activities
- Organization and event management
- Conducting marketing and field research studies
- Social responsibility and conduct of civil society activities
- Conduct of contract processes
- Conducting sponsorship activities
- Conducting strategic planning activities
- Executing marketing processes of products / services
- Foreign personnel work and residence permit procedures
- Giving information to authorized persons, institutions and organizations

5.5. Process Guidance

GEDS will:

	GEDS KVKK and GDPR Policy	PAGE NO	7 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- Ensure that the legal basis for processing personal data is identified in advance and that all processing complies with the law
- Not do anything with your data that you would not expect given the content of this policy and the fair processing or privacy notice
- Ensure that appropriate privacy notices are in place advising staff and others how and why their data is being processed, and, in particular, advising data subjects of their rights
- Only collect and process the personal data that it needs for purposes it has identified in advance
- Ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible
- Only hold onto your personal data for as long as it is needed, after which time GEDS will securely erase or delete the personal data – GEDS’s data retention policy sets out the appropriate period of time
- Ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely

GEDS will ensure that all staff who handle personal data on its behalf are aware of their responsibilities under this policy and other relevant data protection and information security policies, and that they are adequately trained and supervised.

Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining (including accessing) or disclosing personal data in breach of GEDS’s data protection policies may also be a criminal offence.

6. Privacy by Design

GEDS as a design consultancy has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect or process personal data will be subject to due consideration of privacy issues.

Use of techniques such as data minimization and pseudonymisation will be considered where applicable and appropriate.

7. Protection of Personal Data

	GEDS KVKK and GDPR Policy	PAGE NO	8 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, GEDS implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- The pseudonymisation and encryption of personal data;
- The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

7.1. Administrative and Technological Measures

- Network security and application security are provided.
- Closed system network is used for personal data transfers via network.
- Key management is implemented.
- Security measures are taken in the scope of supply, development and maintenance of information technology systems.
- Personal data stored in the cloud is secured.
- Disciplinary regulations are in place for employees regarding data security provisions.
- Training and awareness studies are conducted at regular intervals on data security for employees.
- Authorization matrix has been established for employees.
- Access logs are kept regularly.
- Corporate policies on access information security usage, storage and disposal have been prepared and implemented.
- Data masking is applied as necessary.
- Confidentiality commitments are made.
- Employees who have been resigned or who have resigned from work have been denied authority in this area.
- Current antivirus systems are used.
- Firewalls are used.
- Signed contracts contain data security provisions.
- Extra security measures are taken for the personal data transferred via paper and the related documents are sent in confidential document format.
- Personal data security policies and procedures are established.

	GEDS KVKK and GDPR Policy	PAGE NO	9 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- Personal data security issues are reported quickly.
- Personal data security is monitored.
- Necessary security measures are taken for entering and exiting physical environments containing personal data.
- Physical environments containing personal data are protected against external risks (fire, flood, etc.).
- Enables security of environments containing personal data.
- Personal data is reduced as much as possible.
- Personal data is backed up and the security of the backed up personal data is also ensured.
- User account management and authorization control system is applied and these are followed.
- In-house periodic and / or random audits are conducted and carried out.
- Log records are kept without user intervention.
- The existing risks and threats are identified.
- Protocols and procedures for personal data security have been identified and implemented.
- Up-to-date encryption / cryptographic keys are used for private personal data and are managed by different units.
- Intrusion detection and prevention systems are used.
- Encryption is in progress.
- Special personal data transferred from portable memory, CD and DVD media are encrypted.
- Data service providers are periodically audited for data security.
- Service providers are aware of data security.

8. Categories of Personal Data

Personal Data Categories	Explanation
ID	
Contact	
Location	
Family and Relatives	
Financial	
Bank Account	
Education	
Physical Security	
Audio/Visual	
Criminal Record	

	GEDS KVKK and GDPR Policy	PAGE NO	10 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

Character and Abilities	
Personnel Information	
Performance Data	
Career History	
Applications/	
Signature	
Medical and Health	
Marketing	
Professional experience	

9. Categories of Data Subject

Data Subject	Explanation
Personnel	Current employee of GEDS
Casual Employee	Employees of GEDS who works temporary for a project or task.
Intern	Interns who works in GEDS
Supplier Staff/Representative	The staff of supplier companies.
Work Partner Company Employee	Any other company GEDS works with, in order to perform a contract or a project.
Interview Participant	GEDS gets information from participants making an interview within the project purposes.
Visitor	
Contractor/Consultant/Freelancer	GEDS may work with third party contractors/consultants and freelancers. In order to perform tasks their personal data may be needed.
Job Applicant	Any job applicant to GEDS
Former Personnel	Former GEDS personnel
Website Visitor	Any person who enters the website of GEDS.

10. Transfer of Personal Data

GEDS comply with "Data Protection Law" and privacy principles when it transfers personal data to any third party.

10.1. Domestic Transfer of Personal Data

GEDS transfers personal data to domestic third parties if any of these conditions are met:

- The data subject gives his or her explicit consent,
- The transfer is necessary for the performance of a contract with the data subject,

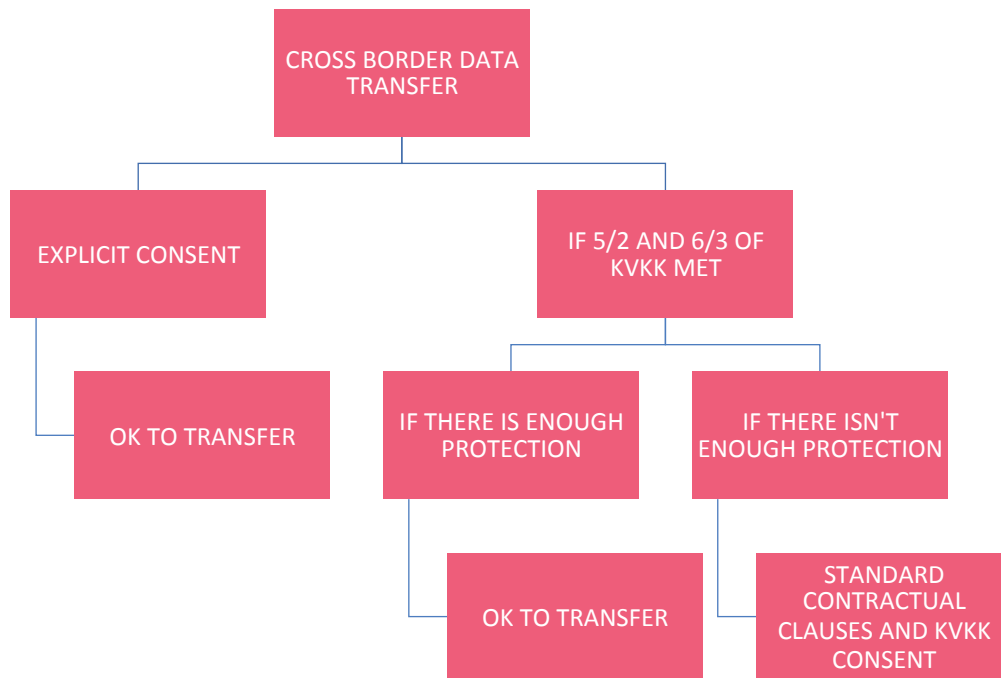
	GEDS KVKK and GDPR Policy	PAGE NO	11 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- To meet GEDS’s legal compliance obligations
- To protect the data subject’s vital interests
- To pursue our legitimate interests (or another’s legitimate interests) which are not overridden because the processing prejudices the interests or fundamental rights and freedoms of data subjects.

Other than these conditions, GEDS doesn’t transfer any personal data to domestic third parties.

10.2. Cross-Border Personal Data

Any cross-border personal data transfer can be done if there is an explicit consent of the data subject, or any of the following conditions are met and there is a contract between the third party that the personal data is transferred to and Personal Data Protection Council allows the data transfer with respect to that contract which includes standard contractual clauses.



10.3. Transfer of Sensitive Personal Data

	GEDS KVKK and GDPR Policy	PAGE NO	12 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

10.4. EU Citizens Personal Data

GEDS processes EU citizen's personal data only if any of the following conditions are met.

- If the EU citizen gives explicit consent for processing his/her personal data
- If it is necessary for the conclusion or performance of a contract concluded with the data subject
- If it is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the GEDS and a third party,
- If important public interests identified as such by EU or EU Member State law applicable to the GEDS are valid in this regard
- If it is necessary in order to protect the vital interests of the data subject or other persons, where the data subject is physically or legally incapable of giving consent

Other than these conditions mentioned above according to article 49 of GDPR if it corresponds to the legitimate interests of GEDS, and if

- The transfer is not repetitive;
- The transfer only concerns a limited number of data subjects;
- The transfer is necessary for the purposes of compelling legitimate interests pursued by the data-exporting controller;
- Those legitimate interests are not overridden by the interests or rights and freedoms of the data subjects;
- GEDS or Data controller who transfers data to GEDS's office out of EU has assessed all surrounding circumstances and provided suitable safeguards for the transfer on the basis of that assessment.

GEDS can transfer the EU citizen's personal data.

Anonymisation before any crossborder transfer of EU Citizen's Personal Data

When a EU citizen's personal data is collected in a EU country, GEDS performs anonymisation process for the personal data collected in the same EU country and then transfer data to the Istanbul office of GEDS or any of its employees or partners again in EU after that process.

11. Acquiring Personal Data from Third Parties

If GEDS acquires personal data from any third party, it ensures that third party took all the necessary measures and collected the personal data in accordance with "Data Protection Law". GEDS acts a written contract with the third party including necessary standard contractual clauses. Other than that GEDS doesn't acquire personal data from any third party

12. Internet Website

	GEDS KVKK and GDPR Policy	PAGE NO	13 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

GEDS collects the IP logs of its website visitors in accordance with the 5651 Law and keeps this data for 2 years in accordance with the 5651 Law.

GEDS may use cookies on its website to personalise content and ads, to provide social media features and to analyse its traffic. GEDS also share information about your use of its website with its social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

13. Anonymisation and Pseudonymisation of Personal Data

Pseudonymisation:

Pseudonym means 'false name' in Greek. Pseudonymisation in IT systems means that you mask the registered and their personal data.

In GDPR, pseudonymisation is defined as "the processing of personal data in such a way that the data can no longer be attributed to a specific data subject without the use of additional information." Personal data is thus exchanged with non-identifying data, and additional information is needed to recreate the original data. Further, the additional information should be kept separately.

Pseudonymisation makes the information such as personal identification numbers and personal data less accessible to unauthorized users, and is a way to comply with GDPR requirements.

Anonymisation:

Anonymised data refers to data that is made anonymous in such a way that the registered can no longer be identified. You simply remove the possibilities of identifying a person, and no additional information can restore the original information. Anonymisation is difficult. You completely lose the connection between data and the individual. Nevertheless, it can be a beneficial technique when the data is used for statistical or research purposes. Anonymisation means that you cannot restore the original information, and such data is out of scope of the GDPR.

Anonymisation methods that does not make any changes in value	Removing Variables Removing Records Regional Concealment Generalization Lower and Upper Limit Coding Global Coding Sampling
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	GEDS KVKK and GDPR Policy	PAGE NO	14 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTK.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

Anonymisation methods that does make changes in value	Micro consolidation Data Exchange Adding Noise
Statistical methods that improve the level of Anonymisation	K-Anonymity L-Diversity T-Proximity

Table: Anonymisation methods

We decide the method that we can use according to the following parameters:

- The nature of the data,
- The size of the data,
- Structure of data in physical environments,
- Diversity of data,
- The benefit / processing purpose of the data,
- Frequency of data processing,
- Reliability of the party to which the data will be transferred,
- Significant efforts to make the data anonymous,
- The magnitude of the damage that may occur in case of anonymity of the data, its effect area,
- The distribution / centrality ratio of the data,
- Authorization control of users to access related data,
- Probability of meaningful effort to construct and implement an attack that disrupts anonymity

14. Individual Rights

GEDS has processes in place to ensure that it can facilitate any request made by an individual to exercise their rights under data protection law. All staff have received training and are aware of the rights of data subjects. Staff can identify such a request and know who to send it to.

All requests will be considered without undue delay and within one month of receipt as far as possible.

Subject access: the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing
- the categories of personal data
- the recipients to whom data has been disclosed or which will be disclosed

	GEDS KVKK and GDPR Policy	PAGE NO	15 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- the retention period
- the right to lodge a complaint with the Information Commissioner's Office
- the source of the information if not collected direct from the subject, and
- the existence of any automated decision making

Rectification: the right to allow a data subject to rectify inaccurate personal data concerning them.

Erasure: the right to have data erased and to have confirmation of erasure, but only where:

- The data is no longer necessary in relation to the purpose for which it was collected, or
- Where consent is withdrawn, or
- Where there is no legal basis for the processing, or
- There is a legal obligation to delete data

Restriction of processing: the right to ask for certain processing to be restricted in the following circumstances:

- If the accuracy of the personal data is being contested, or
- If our processing is unlawful but the data subject does not want it erased, or
- If the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defence of legal claims, or
- If the data subject has objected to the processing, pending verification of that objection

Data portability: the right to receive a copy of personal data which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller. This would only apply if GEDS was processing the data using consent or on the basis of a contract.

Object to processing: the right to object to the processing of personal data relying on the legitimate interests processing condition unless GEDS can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defence of legal claims.

15. DPIA Document

Since GEDS doesn't plan to

- Use systematic and extensive profiling with significant effects;
- Process special category or criminal offence data on a large scale; or
- Systematically monitor publicly accessible places on a large scale.

	GEDS KVKK and GDPR Policy	PAGE NO	16 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

and, GEDS personal data processing activities isn't likely to result a high risk considering the relevant European Guidelines, DPIA document is not needed for GEDS personal data processing activities for now.

16. Data Breaches

In the case of a personal Data breach GEDS willtake all the necessary administrative and technical measures to avoid any potential harm to individuals including below notifications. GEDS shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

16.1. Notification to Lead Supervisory Authority

In the case of a personal data breach, GEDS shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55 unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

The Notification shall at least,

- Describe the nature of the personal data breach including where possible, the categories and approximate number of data subjects concerned and the categories and approximate number of personal data records concerned;
- Communicate the name and contact details of the data protection officer or other contact point where more information can be obtained;
- Describe the likely consequences of the personal data breach;
- Describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

If it is not possible for GEDS to provide the information at the same time, the information may be provided in phases without undue further delay.

16.2. Notification to Data Subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, GEDS shall communicate the personal data breach to the data subject without undue delay.

The communication to the data subject shall describe in clear and plain language the nature of the personal data breach and shall at least,

	GEDS KVKK and GDPR Policy	PAGE NO	17 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

- Communicate the name and contact details of the data protection officer or other contact point where more information can be obtained;
- Describe the likely consequences of the personal data breach;
- Describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject mentioned above shall not be required if any of the following conditions are met:

- The controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- The controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialise;
- It would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

17. Trainings

Regular trainings will be organised to raise awareness about the protection of personal data and to ensure GEDS operates in compliance with relevant laws and regulations.

18. How Will You Apply for any of Your Request?

In order to answer you about your requests we need to confirm your ID. In order to do this, you can choose one of the methods listed below to send us your request.

	METHOD	ADRESS	INFORMATION SHOWN IN REQUEST
Application in Person	Data subject may come to GEDS in person and make his/her request about his/her personal data by declaring his/her ID Card.	GEDS Office given on the company website	A closed envelope should be mailed. "Request for Information within the Scope of

	GEDS KVKK and GDPR Policy	PAGE NO	18 / 18
		DOCUMENT NO	GEDS.KVKK-GDPR.PLTk.1
		DATE	01.03.2018
		REVISION NO	02
		REVISION DATE	01.09.2019
SUBJECT	PERSONAL DATA PROTECTION POLICY		

			Personal Data Protection Law “ should be written on the envelope.
By Mail	Data subject may send a request with original signed document. He/she needs to have a signature authorized by notary.	info@geds.com.tr	A closed envelope should be mailed. “Request for Information within the Scope of Personal Data Protection Law “ should be written on the envelope.
Notary	Data subject may send a request from notary.	GEDS Office address given on the company website	“Request for Information within the Scope of Personal Data Protection Law “ should be written on the envelope.
Email	Data subject may send an email with a document signed with electronic signature of himself/herself.	info@geds.com.tr	Information within the Scope of Personal Data Protection Law “ should be the subject of the email.