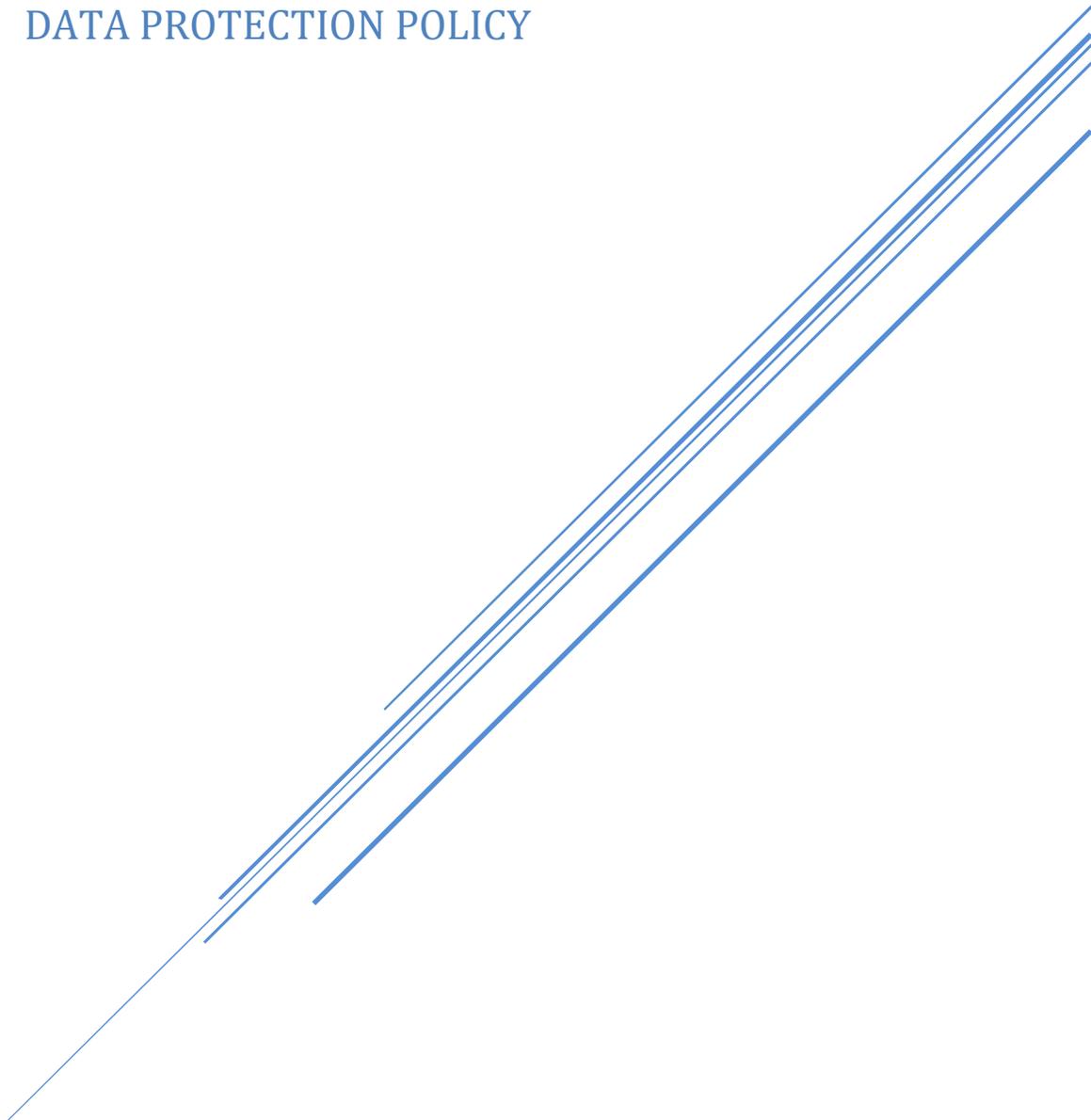




ER-KIM EUROPE POLICY

DATA PROTECTION POLICY





Content

1.	INTRODUCTION	2
2.	DEFINITION	2
3.	SCOPE AND APPLICABILITY	3
4.	PRINCIPLES	4
	A. INFORMATION ABOUT THE CONTROLLER	5
	Name and contract details of the controller	5
	B. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA OF OUR EMPLOYEES, CLIENTS AND CONTRACTUAL PARTNERS	5
5.	IMPLEMENTATION.....	7
	I. Details on the personal data that are processed.....	7
	II. Details on the processing of personal data	20
1.1	Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations	51
	C. INFORMATION ON THE RIGHTS OF DATA SUBJECTS	57
	I. Right of access.....	57
	II. Right to rectification.....	57
	III. Right to erasure (“right to be forgotten”)	58
	IV. Right to restriction of processing.....	58
	V. Right to data portability.....	59
	VI. Right to object	59
(a)	Right to object on grounds relating to the particular situation of the data subject	60
(b)	Right to object to direct marketing.....	60
	VII. Right to withdraw consent.....	60
	VIII. Right to lodge a complaint with a supervisory authority	61
	D. INFORMATION ABOUT THE GENERAL DATA PROTECTION REGULATION TERMINOLOGY USED IN THIS DATA PROTECTION INFORMATION	63
	E. STATUS OF AND CHANGES TO THIS DATA PROTECTION INFORMATION.....	64
	APPENDIX 1 DOCUMENT HISTORY AND VERSION CHECK REGISTRATION	65



1. INTRODUCTION

At Er-Kim Pharmaceuticals, we are committed to the responsible protection of Personal Information in our business processes and the setting of the appropriate standards to achieve this purpose. To that end, we have developed the protection principles below to be applied to the protection of Personal Information in daily activities by all Er-Kim Europe Affiliates.

2. DEFINITION

"AFFILIATE(S)" means any person, firm, trust, partnership, corporation, company or other entity or combination thereof which directly or indirectly (a) controls Er-Kim Pharmaceuticals, (b) is controlled by Er-Kim Pharmaceuticals, or (c) is under common control with Er-Kim Pharmaceuticals;

"CONSENT" means any freely given, specific, revocable and informed indication of the person's agreement to the processing of his/her Personal Information.

"CONTROL" means the possession, directly or indirectly, of the right or power to direct or cause the direction of the management policies of a party either by contract, by ownership of shares or securities carrying a majority of the votes, by the ability to appoint the majority of the directors or other governing officers of a Party, by ownership of shares or other securities which carry the right to receive the greater part of the income or assets of such party or by any other means, and the terms 'Controlled by', 'Controlling' and 'under common Control with' shall have correlative meanings

"DATA CONTROLLER" means the natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal Information.

"DATA PROCESSOR" means the natural or legal person, which Processes Personal Information on behalf and under the instructions of the Data Controller.

"DATA SUBJECT" means the identified or identifiable natural (and, in some jurisdictions also legal) person whose Personal Information is Processed; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity (including a social security number or a code in a clinical trial case report form in combination with other information).

"DISCLOSURE / DISCLOSE / DISCLOSED" means making Personal Information accessible to any person or company other than the Data Subject, the Data Controller or Data Processor. This may include but is not limited to the active Transfer of Personal Information to all Er-Kim Affiliates or third parties, permitting access (including remote access), distribution or publication.

"ER-KIM PHARMACEUTICALS" means Er-Kim Turkey together with companies Controlled by, Controlling or under common Control with Er-Kim Turkey.

"ER-KIM EUROPE AFFILIATES" means Er-Kim Sanayi ve Ticaret Anonim Şirketi ("Er-Kim Turkey")'s Affiliates in the European countries.

"HEADQUARTER" means Er-Kim İlaç Sanayi ve Ticaret Anonim Şirketi operating in Istanbul/Turkey.

"PERSONAL INFORMATION" means all information that relates to a person where that person can be identified by you or others. In some cases, the person can be identified directly (e.g., your name or your photograph) or the person can be identified indirectly (e.g., a medical insurance number, your position



in a company or by means of a study code assigned in a clinical trial). In some countries, Personal Information may also include information such as medical device serial numbers, biological samples, IP addresses or information relating to a company (“legal person”). The definition of Personal Information may vary by country and local law should be consulted. Affiliates should check with the Headquarter for guidance.

“PROCESS / PROCESSING / PROCESSED” means any operation or set of operations performed upon Personal Information. This definition includes, but is not limited to, collection, recording, organization, storage, retrieval, use, disclosure, anonymization, pseudonymization or deletion.

“THIRD PARTY” is any person, including a legal entity, with whom Er-Kim Pharmaceuticals interacts and that is not an Er-Kim Pharmaceuticals company or Affiliate.

“TRANSFER” means any Disclosure of Personal Information by someone other than the person to whom the Personal Information belongs. The term “Transfer” may include the physical movement of Personal Information or the provision of access to Personal Information.

3. SCOPE AND APPLICABILITY

This Policy applies to all Er-Kim Europe Affiliates as well as to all Processes of Personal Information on behalf of Er-Kim Pharmaceuticals. Each Affiliate is accountable for compliance with Data Protection obligations. This Policy sets the protection standards for Er-Kim Pharmaceuticals.

In addition, all Processing and Protecting of Personal Information must be conducted in accordance with relevant local laws, regulations and industry codes, which may be more stringent than the requirements outlined in this Policy.



4. PRINCIPLES

The protection of personal data is important to us. We only process personal data in compliance with the applicable data protection requirements, in particular the General Data Protection Regulation (GDPR) on the measures for the application of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

In [Section A](#) of this Data Protection Information we provide you with information about the **controller** responsible for the processing of your personal data.

In [Section B](#) we also provide you with information about the **processing of your personal data**.

In [Section C](#) we also provide you with information about **your rights with respect to the processing of your personal data**.

In [Section D](#) we also provide you with information about the **technical data protection terms used in this Data Protection Information**.



A. Information about the controller

Name and contract details of the controller

ER-KIM ILAC SANAYİ VE TİCARET A.Ş.

Address: Akat Mahallesi Ebulula Mardin Caddesi Maya Meridian İş Merkezi No: 16 Kat: 9 D: 25, 34335 Beşiktaş, İstanbul, Türkiye;

Email: dataprivacy@er-kim.com.tr ;

Web site: er-kim.com/gdpr

Phone: +90 212 401 59 19

B. Information about the processing of personal data of our employees, clients and contractual partners

At our company we process personal data of our staff/employees, clients and contractual partners for the following purposes:

- recruitment,
- adding staff members to IT systems,
- establishment of employment/contractual relationship, performance of employment agreement or other contract, onboarding, management of personnel files,
- submission of authority notifications and data reporting, employment related record keeping and data reporting obligations,
- contacting the staff members or other persons in connection with the employment or contractual relationship or ,
- facilitation of work, contact and communication among the staff members,
- assignment of the staff members with tasks according to their position/job description and keeping contact with our contracting partners,
- provision of work equipment including IT systems,
- preparation, processing and billing of engagements, client relationship management and participation in market analyses,
- cooperation with our suppliers and supplier relationship management,
- external communication,
- internal communication,



- information and knowledge management,
- human resources management,
- schedule and recording of working time, vacation, planning and recording of absence, ensuring special leave, ensuring extra vacation, organization of work,
- verification of incapacity for work, granting, payment and monitoring social insurance benefits, for refund, reimbursement of paid benefits,
- compensation and benefits management, payment of tax- and social security, pensions or other contributions, data reporting obligations regarding tax and contribution payment, assessment of tax advance, performance of tax and duty return,
- obtaining allowances,
- human resources development,
- travel management,
- ensuring health and safety at work,
- occupational medical examinations, preparation of the return to work,
- compliance with occupational safety requirements and ensuring education on occupational safety and health,
- documentation of work injury or occupational accident and related verification of incapacity for work,
- ensuring healthy and safe work environment for pregnant staff members, for staff members having severe disability, for staff members having special circumstances,
- ensuring IT security,
- compliance management,
- data protection management,
- retention of documents to comply with statutory, in particular commercial, tax and employment law retention obligation,
- retention of documents for evidence purposes for any establishment, exercise or defence of legal claims and, where applicable, the establishment, exercise and defence of legal claims,
- liaison with external tax advisors, accountants or auditors to comply with statutory obligations,
- cooperation with courts and/or authorities to comply with statutory obligations,
- retention of work force, team building and company image development,
- termination of employment or other contractual relationship.

You receive more detailed information on this following part.



5. IMPLEMENTATION

I. Details on the personal data that are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
Master data.	Surname, first name, mother's maiden name, date of birth, nationality, place of birth, country of birth.	Staff.	The provision of these data are required for the conclusion of or by an employment contract. If the data are not provided, it is not possible to conclude an employment contract.
	Personnel numbers(s), initials, cost centre, internal job description/categories, assignment to team managers and teams.	Generated in-house.	-
Administrative notification and registration data.	Surname, first name, tax identification number, date of birth, place of birth, mother's maiden name, start date, termination of insurance relationship, the period of suspension of insurance, weekly working time, CORnumber, social security number, citizenship, data regarding period of insurance and length of service, base and sum of contribution deducted from the income of the insured person.	Staff.	The provision of these data is essential to comply with regulatory requirements related to employee records. It ensures adherence to legal standards governing the maintenance of employee information. This practice supports transparency and accountability within the organizational framework, facilitating effective human resources management and regulatory compliance.
Family data.	Name of children of employees, date of birth of children of employees, marriage certificates.	Staff, relatives of Staff.	The provision of these data may be necessary to receive a special payment, gifts or special vacation days.
Private contact data.	Private address, e-mail address, telephone number, mobile telephone number of staff members.	Staff.	The provision of the private address is required for the conclusion of an employment contract.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
			<p>If the data are not provided, it is not possible to conclude an employment contract.</p> <p>The provision of the private e-mail address, telephone number and mobile telephone number is not required by law or contract. The data subject is not obliged to provide the data.</p> <p>Provision may, however, be necessary to communicate business information to the employee or to organise business trips (e.g. during longer absences).</p> <p>If the data are not provided, it is not possible to communicate business information via these communication channels or to take these data into account for travel bookings.</p>
Bank account data.	Account holder, bank, IBAN, BIC.	Staff.	<p>The provision of these data is required by contract.</p> <p>If the data are not provided, proper payroll accounting is not possible.</p>
Health data I.	Data related to workplace and position which are requested by the authority examining and issuing opinion on the suitability for the position.	Staff.	The submission of this data is essential to uphold and prioritize workplace safety and health standards. This information is crucial for ensuring the well-being and safety of individuals within the working environment, aligning with



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
			our commitment to maintaining a secure and healthy workplace for all personnel involved.
Health data II.	Name, date of birth, tax number, social care number, address, data relating to pregnancy released by the staff member, medical certificate diagnosing pregnancy, data regarding severe disability released by the staff member, medical certificate on severe disability, allowance intended to claim, medical certificate necessary for claiming the allowance, date of issuance of the medical documentation necessary for issuance of certificate on severe disability, the scope of certificate in case of issuance of interim certificate, date of issuance of certificate, signature of medical specialist/general practitioner who has issued the certificate.	Staff.	<p>The collection of health-related data, such as name, date of birth, and medical information, serves staff-related purposes. When used for claiming allowances, it adheres to specific regulations. In other instances, there is no strict obligation for the data subject to provide this information.</p> <p>However, in cases involving labour code rights and safety regulations, providing such data may become necessary. This could include securing additional vacation, protection from unfair dismissal, and ensuring equal employment opportunities for disabled persons. While generally not obligatory, failure to provide data in such instances may impact the ability to safeguard rights under the labour code and safety regulations.</p>
Health data III.	Name, medical certificate of incapacity for work, social care number, date and place of birth, address, period of sick pay, period of incapacity for work, days of sick leave, code of incapacity for work, work place, position, activity, medical data necessary for assignment of healthcare (e.g. doctor's	Staff.	This provision may be necessary for us in order to assess, disburse and monitor the cash benefits of healthcare insurance and other benefits delegated to the competence of social security bodies.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
	certificate of pregnancy, pregnancy book), data regarding wage, fact of permanent illness.		
Application data.	Content of application documents, in particular photograph, CV and certificates/references, notice period, envisaged salary etc., content of written (including electronic) correspondence relating to application, hard copy of the recruitment tests.	Staff, headhunters, employment agencies.	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data. If the data are not provided, however, it is not possible to carry out an application process and, where applicable, to recruit Staff.
	Content of evaluation notes, perceptions from interviews, feedback and evaluations.	Generated in-house.	-
Work permit data.	Data relating to work permits and residence permits.	Staff.	This provision is required to conclude an employment contract. If the data are not provided, it is not possible to conclude an employment contract.
Communication data.	Content of business communication, in particular via post, e-mail and telephone, as well as messages via internal systems.	Staff, other contractual partners.	The provision of these data is not required by law or contract. The data subject is not obliged to provide the data. If the data are not provided, however, business communication and therefore the performance of the employment/contractual relationship may only be possible to a limited extent or not at all.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
	Circumstances of business, in particular persons involved, time and duration.	Generated in-house.	-
Company contact data.	Name, business address (including room and building), e-mail address, telephone number, mobile telephone number, position, department, team, initial, cost centre, location.	Generated in-house.	-
	Personal data in relation with appointment management: name, the fact, if the Staff member is available at a given time.	Staff, other contractual partners.	The provision of these data is not required by law or contract. The data subject is not obliged to provide the data. If the data are not provided, it is not possible to plan the availability of the data subject.
Tool management data.	Name, position, department, cost centre of the staff member, who uses necessary work equipment, name, specification of IT and other tools provided for the staff member, date of request, date of issuance, data of business card, data of chip card, IT access permissions of the folder, signature.	Generated in-house, Staff.	-
	Signature.		The provision of these data is not required by law or contract. The data subject is not obliged to provide the data. The provision of the signature is, however, necessary to prove that the data subject has taken over/handed back the work equipment provided to him/her.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
IT access data.	Access data for IT systems (user name, password) set by staff members.	Staff.	<p>The provision of these data is not required by law or contract. The data subject is not obliged to provide the data.</p> <p>The provision of the data is, however, required for the use of IT systems.</p> <p>If the data are not provided, it is not possible to use IT systems and therefore the performance of the employment relationship may only be possible to a limited extent or not at all.</p>
	Access data for IT systems (user name, password) allocated by us.	Generated in-house.	-
IT protocol data.	Data contained in automatically maintained protocols of all or certain actions of processes in IT systems.	Generated in-house.	-
Contract data.	Data from the employment contract (e.g. working time, work schedule, vacation days, position, date of commencement of the employment, salary, status of employment), where applicable, data from agreements on objectives, where applicable, data relating to a dormant employment relationship, data relating to the employment relationships (e.g. instructions, sanctions, decisions).	Generated in-house.	-
Salary data.	Data relating to wages, salaries and remuneration, where applicable, special payments, in particular: position, name of superior, data regarding attendance and working time recording, address, salary, elements and amount of non-wage	Generated in-house.	-



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
	benefits, individual performance data, performance assessment, legal basis and amount of deductions from wage.		
Reimbursement data.	Name, date of birth, position, cost centre, commencement date of the employment, claim for reimbursements of travel expenses (provision of habitation and residence and declaration that the employee travels to work from there), date of claim, signature, signature of the direct superior and department manager, amount of reimbursement travel cost.	Staff.	<p>The provision of these data is required by contract.</p> <p>If the data are not provided, the fulfillment of our obligations arising from the employment relationship may only be possible to a limited extent.</p>
Tax data.	Tax identification number, social security number, gender, wage related data (eg. sum and title of the income, dividend), data regarding period of insurance and length of service, base and sum of contribution and tax deducted from the income of the insured person, deduction of contribution or the reason for lack of deduction, base of tax advance and the considered allowances, fact that the allowance is claimed jointly, proportion of the jointly claimed allowance, tax identification number of the other party in case of claiming family tax allowance jointly, name, tax identification number of dependent, beneficiary dependent or child falling under scope of alternating custody, name, tax identification number, identification data of child qualifying for allowance, deductions taken into consideration at payment and deductions in connection with the tax, tax advance, payment considered as base of simplified tax contribution, sum of deducted and paid simplified tax contribution, job code, code of legal title of employment, retirement status, fact that the person is involved in any occupational activity while	Tax authority, Staff.	The data are necessary for tax allowance claims.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
	<p>drawing childcare benefits or childcare assistance benefits, nursing allowance, period, sum of eligibility for job-seekers' allowance and deducted pension contributions or reason for lack of deduction, the period of suspension of insurance or the period for which no wages were paid, the corresponding title code, CORnumber, weekly work time, method for cost accounting, name, birth date, tax identification number, social insurance number of the dependent, an indication if those persons are considered dependent, name, tax identification number, allowance intended to claim, date of issuance of specialized doctor's records underlying the issuance of certificate regarding severe disability, statement on the severe disability (final of temporary), the scope of certificate in case of issuance of temporary certificate, date of certificate's issuance, signature of specialized doctor/general practitioner issuing the certificate, name, tax identification number, social security number, other personal data which are necessary for the justification of claiming the allowance in accordance with the applicable legal provisions, content of court decision.</p>		
Qualifications data.	<p>Data relating to skills and qualifications of the staff members that the staff members provide (in particular data from CVs, references, identification data of certificates, participation certificates regarding training and development courses), information relating to memberships, publications.</p>	Staff.	<p>The provision of these data is not required by law or contract. The data subject is not obliged to provide the data.</p> <p>Provision may, however, be necessary for human resources management, in particular human resources planning, human resources development and the preparation of references.</p>



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
			If the data are not provided, implementing promotions and the preparing of references may only be possible to a limited extent or not at all.
	Data relating to skills and qualifications of staff members that we generate in-house (in particular skills classifications, skills evaluations).	Generated in-house.	-
Working time/leave of absence data.	Name, cost centre, position, date of birth, gender, work schedule, working time, organization of working time, time recording, attendance, amount of overtime, number of hours worked, type and duration of absence, request for leave of absence, intention to return to work after child care leave, days and type of absence.	Generated in-house.	-
		Request for leave of absence, intention to return to work after child care leave: Staff.	The provision of these data is required by contract. If the data are not provided, the fulfillment of our obligations arising from the employment relationship or membership may only be possible to a limited extent.
Occupational safety data.	Name, position, signature, place of birth of the staff member who participates in occupational safety training/completes a test, fact of participation in occupational safety training and completing test, name and signature of company representative, name of participants in the risk assessment, personal data contained in the risk assessment (e.g. vulnerable persons, name of responsible person for necessary former measures), name and position of staff member participating in individual protective equipment training, name of staff member providing training, name of staff member participating in first aid training, fact and date of participation, data of certificate of completion of first aid	Generated in-house, Staff.	The provision may be necessary for the assurance of occupational safety and occupational health requirements by us. If the data are not provided, we are not able to assure compliance with occupational safety and occupational health requirements to the full extent.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
	training, data of staff member administering first aid, name, telephone number, date of last exam, data of exam certificate.		
Training data.	Name of Staff member attending compulsory training (stipulated by law or prescribed by the company), position, cost centre, name of superior, result of level assessment, ordered trainings, training plan, training sheet, fact of participation to obligatory training, place and time of obligatory training, name, address and telephone number of the trainer, result of training, certificate issued on the basis of the training, name, place and date of birth, address, department, cost centre, position of staff member attending other trainings, application to other training, date of the application, signature of the applicant, other personal data contained in the application for other training fact of participation to other training, time spent on language class, level of language knowledge, place and date of language course, personal data contained in study contract.	Generated in-house, Staff.	In the case of compulsory trainings the provision of these data is required by the Labour Code. In other cases, the provision of the data is required by contract. If the data are not provided, the performance of the employment relationship or membership may only be possible to a limited extent or not at all.
Occupational accident data.	Name, type of occupational relationship, position, address, place and date of birth, citizenship, social security number, COR number, telephone number, gender, number of days of sick pay, accident severity, start and end date of incapacity for work, reason of accident, result of occupational accident investigation, name of the Staff member's superior, name and position of the person responsible for measures, taken measures in connection with the accident, description, type, date, place of the accident and injury, facts of injury, description of injured body part, qualification of accident (is it qualified as accident at work), the fact if the staff member	Generated in-house, Staff.	The provision of the data is required by contract. If the data are not provided, the performance of the employment relationship may only be possible to a limited extent.



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
	<p>continues the work, name of witness, name of the person performing investigation, name of participants of investigation, name and signature of the person recording protocol, name and signature occupational safety representative, name, signature and number of qualification certificate of person performing investigation of accident, name, signature and position of company representative, other personal data contained in protocol on accident at work.</p>		
Team building data data.	<p>Name of staff member or contractual partner intended to attend a company social event, intention of attendance to the event, cost centre, meal preferences, detail of transport and accomodation to and from the event.</p>	<p>Staff, other contractual partners.</p>	<p>The provision of these data is not required by law or contract. The data subject is not obliged to provide the data.</p> <p>The provision of the data is, however, required for organizing team building or social events.</p> <p>If the data are not provided, the data subjects can not attend a company social event.</p>
Multimedia data.	<p>Photographs or videos of staff provided by staff.</p>	<p>Staff.</p>	<p>The provision of these data is not required by law or contract. The data subject is not obliged to provide the data.</p> <p>The provision may, however, be necessary for the internal and external communication of a staff member.</p>



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
			If the data are not provided, internal communication and the public relations work of our company may not be possible.
	<p>Photographs of staff taken or commissioned by us.</p> <p>Data from video recordings of staff made or commissioned by us.</p>	Generate in-house, photographers, advertising agencies.	-
Travel data.	Data on business trips (including trips necessary for training purposes), in particular name of travelling staff member, date, destination, trip length, cost centre, costs in relation to travel, age, data of passport, data of airplane ticket, railway ticket, name of accommodation, type and reservation code of rent car, date of ordering a taxi, preferences such as travel class, seats, smoker/non-smoker or meals, customer loyalty programme numbers (for airlines, car hire companies, hotels, train companies etc.), visa information.	Staff.	<p>The provision of these data is not required by law or contract. The data subject is not obliged to provide the data.</p> <p>The provision of the data may, however, be necessary for organising business travel.</p> <p>If the data are not provided, it may only be possible to carry out trips to a limited extent or not at all.</p>
Insurance data.	<p>Information from membership confirmations relating to health insurance, pension notices, professional liability insurance.</p> <p>Information from insurance contracts determined by us and deduced from salaries.</p>	Staff.	<p>Providing this data is crucial for aspects related to emergency ordinances, leave entitlements, social health insurance benefits, and compliance with the labour code.</p> <p>The provision of the data is also necessary for social insurance registration and the payment of wages/salaries or remuneration.</p>



Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data
			If the data are not provided, social insurance registration and the payment of wages/salaries or remuneration are not possible.
Work product data.	Data relating to the fulfillment of the employment/contractual relationship, in particular data relating to activities and tasks, data contained in work product created by staff, contact data referred to in contracts concluded by us (e.g. name, signature; power of representation, company telephone number, company e-mail address of a staff member), goal achievement, performance appraisals.	Generated in-house, Staff.	The provision of these data is required by contract. If the data are not provided, the performance of the employment/contractual relationship may only be possible to a limited extent or not at all.
Controlling data.	Name, cost centre, department, team, ratio of absence from work, other statements on costs and productivity.	Generated in-house.	-
Termination data.	Name, tax number, social care number, address, citizenship, bank account number, educational qualification, qualification certificate, commencement date, termination and code of insurance, weekly working time, CORnumber. Data of underlying documentation relating to termination of employment/contractual relationship or membership, record of return of provided tools.	Generated in-house.	-



II. Details on the processing of personal data

Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>Recruitment:</p> <p>We process personal data for the recruitment of staff in particular for the following purposes:</p> <p>selection of applicants,</p> <p>preparation of contracts.</p>	<p>Master data,</p> <p>private contact data,</p> <p>application data,</p> <p>communication data,</p> <p>company contact data,</p> <p>contract data,</p> <p>salary data,</p> <p>qualifications data,</p> <p>multimedia data.</p>	<p>No automated decision-making takes place.</p>	<p>Taking steps at the request of the data subject prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to hire a workforce of appropriate quality.</p>	<p>Er-Kim companies,lawyers and advisors,</p> <p>payroll and financial account service provider,</p> <p>permanent cooperating IT expert or IT service providers,</p> <p>document archiving partner.</p>	<p>The data will be deleted after 3 years commencing at the end of the year in which the employment has been terminated.</p>
<p>Adding staff to IT systems:</p> <p>When adding staff to IT systems, the staff member's details are recorded for the first time in the IT systems provided for this for company and staff administration (in particular in the human resources management program, payroll</p>	<p>Master data,</p> <p>private contact data,</p> <p>work permit data,</p> <p>communication data,</p> <p>company contact data,</p>	<p>No automated decision-making takes place.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship.</p>	<p>Er-Kim companies,</p> <p>payroll and financial accounting service provider,</p> <p>permanent cooperating IT expert or IT service providers.</p>	<p>The data will be deleted after 10 working days commencing at the end of the employment contract.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
and accounting program, office management program and directory service for IT systems).	IT access data, contract data, salary data, qualifications data, multimedia data, insurance data.				
<p>When staff members start working at the company:</p> <p>In order to integrate staff members into our company and to commence the legal relationship with us, we process personal data in particular for the following purposes:</p> <p>Establishment of employment relationship, performance of employment contract, onboarding, management of personnel files,</p>	<p>Master data, administrative notification and registration data, application data, qualifications data, bank account data, contract data, communication data, company contact data,</p>	<p>No automated decision-making takes place.</p>	<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Article 3 of Decision no. 905/2017..</p> <p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>In connection with the data contained in the certificates: balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection</p>	<p>Er-Kim companies, payroll and financial accounting service provider, training service providers, IT service providers or permanent cooperating IT expert, document archiving partner.</p>	<p>We store employment documents containing data regarding service time of the employee and salary –for 5 years commencing at the end of the year in which the staff member reaches the applicable retirement age.</p> <p>Employer’s notices will be deleted at the end of the year following the year of termination of the employment, save for a dispute arises from the employment. In this case employer’s notices will be</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	IT access data, insurance data, multimedia data.		Regulation). Our legitimate interest is to employ a workforce of appropriate quality.		stored until the final completion of the dispute. Other data will be deleted in the case of employment relationship within 3 years commencing at the end of the year in which the employment has been terminated.
Submission of authority notifications and data reporting, employment related record keeping and data reporting obligations,	Administrative notification and registration data.		Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Article 4 of Decision no. 905/2017.	Payroll and financial account service provider, permanent cooperating IT expert or IT service provider.	Declarations towards the authorities in connection with the commencement of the employment relationship will be deleted after 5 years commencing at the end of the year in which the limitation period of the right of tax assessment.
Contacting the staff member in connection with the employment relationship,	Private contact data.		Performance of a contract to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Er-Kim companies, payroll and financial account service provider., permanent cooperating IT expert or IT service provider.	We will delete these personal data after 5 years commencing at the end of the year in which your employment relationship has been terminated.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
Facilitation of work, contact and communication among the staff members,	Company contact data, multimedia data.		<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Our legitimate interest is that staff members access and identify each other easily during work, and know who is the staff member to work with on a task or when is it possible to set up a meeting for this staff member.</p> <p><u>In case of photos:</u> consent pursuant to GDPR Art. 6 (1) a).</p>	<p>Er-Kim companies, lawyers and advisors, payroll and financial account service provider, permanent cooperating IT expert or IT service provider.</p>	<p>The data will be deleted after 10 working days commencing at the end the employment contract.</p>
Assignment of the staff members with tasks according to their position/job description and keeping contact with our contracting partners,	Work product data, communication data.		<p>Performance of a contract to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Er-Kim companies, lawyers and advisors, payroll and financial accounting service providers, permanent cooperating IT expert, IT service provider,</p>	<p>We will delete the personal data contained in accounting documents underlying the accounting records directly or indirectly. Depending on the document type, document retention requirements under accounting law can be between 5 and 10 years.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
				document archiving partners.	Other data will be deleted in the case of employment relationship within 3 years commencing at the end of the year in which the employment has been terminated.
<p>Provision of work equipment including IT systems:</p> <p>For the purpose of providing company work equipment and protection of property we process personal data in particular for the following purposes:</p> <p>provision of workspaces, work equipment,</p> <p>provision of and support for IT systems, including (mobile) IT workspaces and (mobile) telephones.</p>	<p>Tool management data, communication data, company contact data, IT access data, IT protocol data.</p>	No automated decision-making takes place.	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment /mandate relationship or membership and the security of the property of the company.</p>	<p>Er-Kim companies, (mobile) telephone service providers, permanent cooperating IT expert or IT service providers, landlord (regarding chip card number and name), provider of print products.</p>	<p>The link between the chip card number and the data subject will be destroyed within 3 months after the termination of employment relationship or membership at the latest. After the destruction of this link this data can not be attributed to the data subject any more.</p> <p>Other data will be deleted in the case of employment relationship within 3 years commencing at the end of the year in which the employment has been terminated.</p>
Preparation, processing and billing, client relationship management and participation in market analyses:	Master data, communication data,	No automated decision-making takes place.	Performance of a contract, to which the data subject is party (point (b) of Article 6	Er-Kim companies, permanent marketing advisors,	The retention period for data contained in documents affected by statutory, in particular accounting law document



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>For the preparation, processing and billing, client relationship management and participation in market analyses we process the personal data of our staff members in particular for the following purposes:</p> <p>In order to be able to identify our (potential) clients, their economic beneficiary, the persons acting for them and their authorisation before or upon establishing the commercial relationship and carry out a comparison with sanctions lists,</p> <p>for the preparation of the commercial relationship in particular for pre-contractual correspondence to prepare offers and cost estimates,</p> <p>in order to perform contractual relationships,</p> <p>for translations,</p>	<p>company contact data, qualifications data, multimedia data, work product data.</p>		<p>paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is cooperation with our business partners.</p>	<p>payroll and financial account service provider, clients and contractual partners, representatives and/or advisors of the client/contractual partner, experts and/or other service providers, insurers, permanent cooperating translators, courts and/or other authorities, press publishers and market analysts, shipping/courier service providers, permanent cooperating IT expert or IT service providers,</p>	<p>retention obligations can be between 5 and 10 years.</p> <p>Data containing in documents regarding settlement of any existing liability claims and the exercise of any claims are stored until the end of the calendar year in which dispute has ended in a legally binding way.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>for proper internal administration, including maintaining reference files and the operation of IT systems for administrative purposes,</p> <p>for proper accounting and invoicing,</p> <p>for the proper retention of documents in order to meet statutory, professional, anti-money laundering, commercial and tax law retention obligations and for evidence purposes for any establishment, exercise or defence of legal claims,</p> <p>to settle any existing liability claims and the exercise of any claims against our contractual partners,</p> <p>to cooperate with courts and/or authorities in order to comply with statutory obligations,</p>				document archiving partners.	



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>to liaise with external auditors in order to comply with statutory obligations,</p> <p>for client relationship management and the alignment of our products and services with the needs and wishes of our (potential) clients and contractual partners,</p> <p>for the naming of references for analyses by press publishers and analysts.</p>					
<p>Cooperation with our suppliers and supplier relationship management:</p> <p>Suppliers are all natural persons or legal entities that manufacture and/or supply goods or provide services for us.</p> <p>We process personal data of our staff members for cooperation with our suppliers and supplier relationship management in</p>	<p>Master data, communication data, company contact data, work product data.</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is cooperation with our business partners.</p>	<p>Er-Kim companies, suppliers (including human resources, shipping/courier service, payment and financial accounting, travel, mobile telephone, training and IT service provider), courts and/or authorities, lawyers and advisors,</p>	<p>We store the data contained in documents affected by statutory, in particular accounting law document retention obligations until the end of the statutory retention period. Depending on the document type, document retention requirements can be between 5 and 10 years.</p> <p>We store documents for evidence purposes for the possible establishment, exercise</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>particular for the following purposes:</p> <p>Taking steps prior to entering into a contract, including pre-contractual communication with suppliers,</p> <p>Performance of contracts with our suppliers, including contractual communication, exchange of services invoicing and payment processing,</p> <p>Proper internal administration, including operation of IT systems for administrative purposes,</p> <p>Proper bookkeeping and storage of documents to comply with statutory, in particular commercial law, tax law and retention obligations,</p> <p>Storage of documents for evidence purposes for the possible establishment, exercise or defence of legal claims and</p>				<p>permanent cooperating IT expert,</p> <p>payroll and financial account service provider,</p> <p>document archiving partners.</p>	<p>or defence of legal claims and the establishment, exercise of defence of claims against our suppliers for 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.</p> <p>We store other data until the end of the year following the termination of the business relationship.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>the establishment, exercise of defence of claims against our suppliers, including liaison with external lawyers,</p> <p>Liaison with accountants and/or auditors to comply with statutory obligations,</p> <p>Business relationship management, making contact to inform our suppliers and to maintain relationships with our suppliers.</p>					
<p>External communication:</p> <p>For our company's external communication we process personal data of our staff members in particular for the following purposes:</p> <p>Publication of an external staff directory with company contact data and on a voluntary basis, where applicable, additional content (e.g. photo, CV) on our websites,</p>	<p>Master data, company contact data, multimedia data, work product data.</p>	<p>No automated decision-making takes place.</p>	<p><u>For use of photos and videos:</u></p> <p>We process photos and videos of our staff members for external communication purposes only with consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p><u>For processing in other respects:</u></p> <p>Performance of a contract, to which the data subject is</p>	<p>Er-Kim companies, lawyers and advisors, marketing advisors, translators, recipients of our external communication, permanent cooperating IT expert or IT service provider.</p>	<p>Data are deleted within 1 month following the termination of the employment relationship at the latest.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>Operation of IT systems for external communication (in particular for our websites),</p> <p>Publication of staff changes.</p>			<p>party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship and efficient external communication.</p>		
<p>Internal communication:</p> <p>For our company's internal communication we process the personal data of our staff members for the following purposes:</p> <p>Publication of a staff directory accessible to all staff members with company contact data and on a voluntary basis, where applicable, with additional content (e.g. photo, CV) on our</p>	<p>Master data, communication data, company contact data, qualifications data, multimedia data, work product data.</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship and efficient external communication.</p>	<p>Er-Kim companies, lawyers and advisors, marketing advisors, permanent cooperating IT expert or IT service provider.</p>	<p>Data are deleted within one month following the termination of the employment relationship at the latest.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>internal staff portal on the Intranet,</p> <p>Operation of IT systems for internal communication (in particular for our staff portal on the Intranet,</p> <p>Announcement of staff changes.</p>					
<p>Information and knowledge management:</p> <p>For information and knowledge management we process personal data in particular for the following purposes:</p> <p>Exchange of information and knowledge within the company,</p> <p>Operation of IT systems for information and knowledge management,</p> <p>Exchange regarding expertise and industry knowledge of our staff.</p>	<p>Master data,</p> <p>communication data,</p> <p>company contact data,</p> <p>IT protocol data,</p> <p>qualifications data,</p> <p>multimedia data,</p> <p>work product data.</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship and efficient information and knowledge management.</p>	<p>Er-Kim companies, permanent cooperating IT expert or IT service provider.</p>	<p>We store these data until 3 years commencing at the end of the year in which the employment relationship has been terminated.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>Human resources management:</p> <p>For human resources management we process personal data in particular for the following purposes:</p> <p>staff management,</p> <p>staff planning (individual and collective staff planning),</p> <p>staff performance appraisals,</p> <p>human resources development,</p> <p>human resources communication,</p> <p>recruitment and human resources marketing,</p> <p>human resources controlling,</p> <p>human resources administration,</p> <p>operation of IT systems for human resources management.</p>	<p>Master data,</p> <p>family data,</p> <p>private contract data,</p> <p>health data II and III,</p> <p>application data,</p> <p>communication data,</p> <p>company contact data,</p> <p>tool management data,</p> <p>IT access data,</p> <p>contract data,</p> <p>salary data,</p> <p>reimbursement data,</p> <p>tax data,</p> <p>qualifications data,</p> <p>working time/ leave of absence data,</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship and to obtain a full picture of efficiency of HR processes within the company and be able to monitor their operation.</p>	<p>Er-Kim companies,</p> <p>shipping/courier service providers,</p> <p>payroll and financial account service provider,</p> <p>travel service providers,</p> <p>training service providers,</p> <p>permanent cooperating IT expert or IT service providers.</p>	<p>We store these personal data until the end of the year following the termination of the employment/mandate relationship or the membership has been terminated.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	training data, multimedia data, work product data, controlling data, termination data.				
Schedule and recording of working time, vacation, planning and recording of absence, ensuring special leave, ensuring extra vacation, organization of work.	Working time/leave of absence data.	No automated decision-making takes place.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Er-Kim companies, lawyers and advisors, payroll and financial account service provider, permanent cooperating IT expert or IT service providers, document archiving partners.	We store these data until the purposes of processing these data specified below have been achieved. We also store the data if other statutory, in particular accounting law document retention obligations exist. Depending on the document type, document retention requirements under accounting law can be between 5 and 10 years.
Incapacity for work: We process personal data for verification of incapacity for work, for granting, payment and	Health data III.	No automated decision-making takes place.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): (point (f) of Article 6	Payroll and financial account service provider,	We store employment documents containing data regarding service time and reimbursement of the Staff member – for leave and social



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>monitoring social insurance benefits, for refund, reimbursement of paid benefits (sick pay, child care allowance, child care benefit, social care supplement on its own right or on relatives).</p>			<p>paragraph 1 of the General Data Protection Regulation).</p> <p>Our legitimate interest is to process data specified for leave and social health insurance benefits for the purpose of assessment, disbursement and monitoring of cash benefits of healthcare insurance, and other benefits delegated to the competence of social security bodies, furthermore in the interest of the reimbursement of paid benefits.</p>	<p>permanent cooperating IT expert or IT service providers.</p>	<p>health insurance benefits - for 5 years commencing at the end of the year in which the Staff member reaches the applicable retirement age.</p> <p>We store other documents not qualifying as accounting document between 5 and 10 years.</p>
<p>Payroll management:</p> <p>For payroll management we process personal data for the following purposes:</p> <p>proper payroll accounting, including payment of tax- and social security, pensions or other contributions,</p>	<p>Master data,</p> <p>private contact data,</p> <p>bank account data,</p> <p>health data III,</p> <p>communication data,</p> <p>company contact data,</p>	<p>No automated decision-making takes place.</p>	<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Er-Kim companies,</p> <p>courts and/or authorities (tax office),</p> <p>social security institutions,</p> <p>shipping/courier service providers,</p> <p>payroll and financial accounting service provider,</p>	<p>We store employment documents containing data regarding service time of the Staff members and remuneration – for leave and social health insurance benefits – for 5 years commencing at the end of the year in which the Staff member reaches the applicable retirement age.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	contract data, salary data, tax data, insurance data.			permanent cooperating IT expert or IT service provider, document archiving partners.	We store the data based on statutory, in particular accounting law document retention obligations. Depending on the document type, document retention requirements can be between 5 and 10 years.
providing cost reimbursement based on the employment,	Reimbursement data.		Fulfilling a legal obligation, as per Article 6(1)(c) of the General Data Protection Regulation, necessitates compliance with accounting and fiscal procedure requirements. This aligns with established legal frameworks relevant to financial matter	Er-Kim companies, courts and/or authorities (tax office), social security institutions, shipping/courier service providers, payroll and financial accounting service provider, permanent cooperating IT expert or IT service provider, document archiving partner.	We store employment documents containing data regarding service time and remuneration of the Staff member – for leave and social health insurance benefits - for 5 years commencing at the end of the year in which the Staff member reaches the applicable retirement age. We store the data based on statutory, in particular accounting law document retention obligations.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
					Depending on the document type, document retention requirements can be between 5 and 10 years.
issuance of employer's certificates in relation with payments, allowances, performance of employer's data reporting obligations in connection with tax and contribution payment, assessment of tax advance, performance of tax and duty return,	Master data, private contact data, tax data.		<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation), the processing of data is carried out to comply with legal requirements related to emergency ordinances on leave, social health insurance benefits, and the fiscal procedure code.</p> <p>In case of tax allowances which may be claimed by the employer regarding the employees: balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to ensure the claim of tax allowances.</p>	Payroll and financial accounting service provider, permanent cooperating IT expert, IT service provider.	Data in connection with payment of taxes and contributions will be deleted after 5 years commencing at the end of the year in which the limitation period of the right of tax assessment.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
Obtaining allowances (family tax allowance, personal allowance, allowance for severe disabled persons).	Health data II, family data.	No automated decision-making takes place.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation), data processing is conducted to adhere to regulatory provisions related to emergency ordinances on leave, social health insurance benefits, and the labour code.	Er-Kim companies, courts and/or authorities (tax office), social security institutions, shipping/courier service providers, payroll and financial accounting service provider., permanent cooperating IT expert or IT service provider, document archiving partner.	We store employment documents containing data regarding service time and reimbursement of the Staff members - for leave and social health insurance - for 5 years commencing at the end of the year in which the Staff member reaches the applicable retirement age. Data in connection with payment of taxes and contributions will be deleted after 5 years commencing at the end of the year in which the limitation period of the right of tax assessment.
Human resources development: For human resources development we process personal data in particular for the following purposes: management and carrying out of internal obligatory (prescribed	Master data, communication data, company contact data, qualifications data, multimedia data,	No automated decision-making takes place.	<u>In the case of compulsory trainings prescribed by law:</u> compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): This includes adherence to requirements related to employment regulations and	Er-Kim companies, training service providers, travel service providers, permanent cooperating IT expert or IT service providers.	Data will be deleted in the case of employment relationship within 3 years commencing at the end of the year in which the employment has been terminated.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>by law or by us) or optional training courses,</p> <p>management and booking of external obligatory (prescribed by law or by us) or optional training courses, including cooperation with external training service providers.</p>	<p>travel data,</p> <p>training data.</p>		<p>workplace safety and health standards.</p> <p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to ensure necessary educations and trainings to our staff.</p>		
<p>Travel management:</p> <p>For travel management we process personal data in particular for the following purposes:</p> <ul style="list-style-type: none"> • booking of business trips, • cooperation with travel service providers, • management of company credit cards, 	<p>Master data,</p> <p>communication data,</p> <p>company contact data,</p> <p>travel data.</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Er-Kim companies,</p> <p>travel service providers,</p> <p>payroll and financial account service provider,</p> <p>permanent cooperating IT expert or IT service provider,</p> <p>document archiving partner.</p>	<p>We store the data based on statutory, in particular accounting law document retention obligations.</p> <p>Depending on the document type, document retention requirements can be between 5 and 10 years.</p> <p>We store other data for 3 years commencing at the end of the</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<ul style="list-style-type: none"> travel expense accounting, operation of IT systems for travel management. 					year in which your employment has been terminated.
<p>Ensuring health and safety at work:</p> <p>In order to ensure health and safety at work, we process personal data in particular for the following purposes:</p> <p>Occupational medical examinations, preparation of the return to work,</p>	Health data I.	No automated decision-making takes place.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Aligns with obligations set by employment regulations and workplace safety and health standards.	Permanent cooperating IT expert or IT service provider, document archiving partner.	We will delete these personal data after 3 years commencing at the end of the year in which the employment has been terminated.
Compliance with occupational safety requirements and ensuring education on occupational safety and health,	Occupational safety data.		<p><u>Data regarding obligatory education and risk assessment</u>: Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation):</p> <p>Aligns with obligations set by employment regulations and workplace safety and health standards.</p>	Occupational safety expert, permanent cooperating IT expert or IT service providers, document archiving partner.	<p>We store the personal data contained in occupational safety risk assessment for 5 years commencing from performance of risk assessment.</p> <p>We store other data for 3 years commencing at the end of the year in which the employment has been terminated.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
			Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to be able to prove the assurance of occupational safety and occupational health requirements and take additional safety measures in line with the regulations outlined in workplace safety and health standards.		
Documentation of work injury or occupational accident and related verification of incapacity for work,	Occupational accident data.		<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Requirements related to employment regulations and workplace safety and health standards.</p> <p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	Occupational safety expert, permanent cooperating IT expert, IT service providers, document archiving partner.	<p>We store documents regarding work accidents for 5 years commencing at the end of the year in which the accident occurred.</p> <p>We store employment documents containing data regarding service time and remuneration of the Staff members - for leave and social health insurance -- for 5 years commencing at the end of the year in which the Staff member</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
					reaches the applicable retirement age.
Ensuring healthy and safe work environment for pregnant staff members, for staff members having severe disability, for staff members having special circumstances (e.g. employees qualifying as young employees, employed with children under age of 3 etc.).	Health data II, health data III, company contact data.	No automated decision-making takes place.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to be able to prove the assurance of occupational safety and occupational health requirements and further occupational safety requirements.	Occupational safety expert, permanent cooperating IT expert or IT service providers, document archiving partner.	We store other data for 3 years commencing at the end of the year in which the employment has been terminated.
Ensuring IT security: In order to ensure IT security, we process personal data in particular for the following purposes: <ul style="list-style-type: none"> • Operation of IT systems for IT security, • documentation of IT security undertakings of our staff members and IT security training courses. 	Master data, company contact data, IT access data, IT protocol data, work product data.	No automated decision-making takes place.	Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation). Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship or membership and ensuring IT security.	Er-Kim companies, permanent cooperating IT expert or IT service providers.	We store other data for 3 years commencing at the end of the year in which the employment has been terminated.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>Compliance management:</p> <p>For compliance management we process personal data in particular for the following purposes:</p> <ul style="list-style-type: none"> Documentation of compliance undertakings of our staff members and compliance training courses. 	<p>Master data, company contact data, work product data.</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship and efficient compliance management.</p>	<p>Er-Kim companies, permanent cooperating IT expert or IT service providers.</p>	<p>We store other data for 3 years commencing at the end of the year in which the employment has been terminated.</p>
<p>Data protection management:</p> <p>For data protection management we process personal data in particular for the following purposes:</p> <ul style="list-style-type: none"> Documentation of data protection undertakings of 	<p>Master data, communication data, company contact data, work product data.</p>	<p>No automated decision-making takes place.</p>	<p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>Compliance with a legal obligation (point (c) of Article</p>	<p>Er-Kim companies, permanent cooperating IT expert or IT service providers.</p>	<p>We store other data for 3 years commencing at the end of the year in which the employment has been terminated.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
<p>our contractual partners and data protection training courses,</p> <ul style="list-style-type: none"> • maintaining records of processing activities, • processing requests from data subjects regarding the exercise of their data protection rights, • handling and documents of any data protection incidents, • operation of IT systems for data protection management. 			<p>6 paragraph 1 of the General Data Protection Regulation).</p> <p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the employment relationship and efficient data protection management.</p>		
<p>Retention of documents to comply with statutory, in particular commercial, tax and employment law retention obligations.</p>	<p>Master data, private contact data, family data, bank account data, health data I-III, work permit data, communication data, company contact data, IT access data,</p>	<p>No automated decision-making takes place.</p>	<p>Compliance with legal obligations (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Er-Kim companies, payroll and financial accounting service providers, permanent cooperating IT expert or IT service providers.</p>	<p>We store the data contained in documents affected by retention obligation under statutory law for the prescribed retention period. (The retention period for data contained in documents affected by statutory, in particular accounting law document</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	IT protocol data, contract data, salary data, tax data, qualifications data, multimedia data, insurance data, work product data.				retention obligations or retention obligations based on attorney act can be between 5 and 10 years.
Retention of documents for evidence purposes for any establishment, exercise or defence of legal claims and, where applicable, the establishment, exercise and defence of legal claims.	Data required in the individual case for the establishment, exercise or defence of legal claims. These can in particular belong to the following data categories: master data, administrative notification and registration data, private contact data, family data, bank account data,	No automated decision-making takes place.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of legal claims. Processing is necessary for the establishment, exercise or defence of legal claims (point (f) of Article 9 paragraph 2 of the General Data Protection Regulation).	Er-Kim companies, lawyers and advisors, payroll and financial accounting service providers, permanent cooperating IT expert or IT service providers, document archiving partner.	Data containing in documents regarding <u>establishment, exercise or defence of legal claims</u> are stored until the end of the calendar year in which the limitation period for the claim has been expired or the dispute has ended in a legally binding way.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	health data I-III, work permit data, communication data, company contact data, tool management data, IT access data, IT protocol data, contract data, salary data, reimbursement data, working time/leave of absence data, occupational safety data, training data, occupational accident data,				



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	travel data, tax data, qualifications data, multimedia data, insurance data, termination data, work product data.				
Liaison with external tax advisors, accountants/or auditors to comply with statutory obligations.	Data required in the individual case for compliance with statutory obligations. These can in particular belong to the following data categories: master data, administrative notification and registration data,	No automated decision-making takes place.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): Adherence to accounting regulations. Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is compliance with the accounting and tax law provisions.	Er-Kim companies, payroll and financial account service provider, external tax advisors, external auditors, permanent cooperating IT expert or IT service providers, document archiving partner.	We store the data contained in documents affected by statutory, in particular accounting law document retention obligations until the end of the statutory retention period. Depending on the document type, document retention requirements under accounting law can be between five and ten years. Declarations towards the authorities in connection with the commencement of the employment will be deleted



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	family data, private contact data, bank account data, health data I-III, application data, work permit data, company contact data, tool management data, IT access data, IT protocol data, contract data, salary data, reimbursement data, tax data, multimedia data,				after 5 years commencing at the end of the year in which the limitation period of the right of tax assessment.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	work product data, termination data insurance data.				
Cooperation with courts and/or authorities to comply with statutory obligations.	Data required in the individual case for compliance with statutory obligations. These can in part belong to the following data categories: master data, bank account data, health data I-III, application data, contract data, salary data, tax data, work permit data,	No automated decision-making takes place.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to comply with the requests of the courts and/or authorities. Processing is necessary for the establishment, exercise or defence of legal claims (point (f) of Article 9 paragraph 2 of the General Data Protection Regulation).	Er-Kim companies, lawyers and advisors payroll and financial account service provider, courts and/or authorities, permanent cooperating IT expert or IT service providers, document archiving partner.	Data are stored until the end of the calendar year in which the court procedure or the procedure of the authority has ended in a legally binding way.



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
	work product data.				
Retention of work force, team building and company image development.	Team building data, multimedia data.	No automated decision-making takes place.	Consent pursuant to GDPR Art. 6 (1) a).	Er-Kim companies, permanent cooperating IT expert or IT service provider	We store data in connection with company events until the end of the year following the year of the events. Photos made on the event will be deleted after 10 years commencing at the end of the year in which the event has been organized.
Termination of employment relationship.	Termination data.	No automated decision-making takes place.	<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation): labour code, civil code.</p> <p>Performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Er-Kim companies, lawyers and advisors, payroll and financial account service provider,</p> <p>permanent cooperating IT expert or IT service providers, document archiving partner.</p>	<p>Declarations towards the authorities in connection with the commencement of the employment will be deleted after 5 years commencing at the end of the year in which the limitation period of the right of tax assessment.</p> <p>We store employment documents containing data regarding service time of the Staff member for 5 years commencing at the end of the year in which the Staff member reaches the applicable retirement age.</p>



Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient	Storage duration
					We will delete records on return of provided tools after 3 years commencing at the end of the year in which the employment has been terminated.



1.1 Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Lawyers and other advisors.	Controller.	Within the EU.	-
Marketing advisors.	Processor. Purpose of the data processing: performance of the cooperation agreement concluded between the company and the Recipient. The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the company.	Within the EU.	-
Contracted translators.	Processor. Purpose of the data processing: translation services. The duration of the data processing: data are deleted within 2 weeks after the termination of the data	Within the EU.	-



	processing agreement concluded with the company.		
Social security institutions.	Controller.	Within the EU.	-
Occupational safety expert.	Controller.	Within the EU.	-
External auditors.	Controller.	Within the EU.	-
External tax advisors.	Controller.	Within the EU.	-
Landlord.	Controller.	Within the EU.	-
Provider of print products.	Processor.	Within the EU.	-
Courts and/or authorities.	Controller.	Depending on the location of the relevant court and/or the relevant authority, within or outside the EU.	We only transfer personal data to third countries and/or to international organisations to the extent that this is necessary to perform the employment contract with our staff member or the agreement with our contractual partner (point (b) of Article 49 paragraph 1 of the General Data Protection Regulation) and/or to establish, exercise or defend legal claims (point (e) of Article 49 paragraph 1 of the General Data Protection Regulation).
Document archiving partner.	Processor. Purpose of the data processing: storage, archiving and deleting of documents. The duration of the data processing: data are deleted within 2 weeks after the termination of the data	Within the EU.	-



	processing agreement concluded with the Company.		
Recipients of our external communication.	Controller.	Depending on the location of the relevant recipient, within or outside the EU.	We only transfer personal data to third countries and/or international organisation to the extent that the data subject has given their express consent to the proposed data transfer (point (a) of Article 49 paragraph 1 of the General Data Protection Regulation) or this is necessary to perform the employment contract with our staff member or the agreement with our contractual partner (point (b) of Article 49 paragraph 1 of the General Data Protection Regulation).
Suppliers.	Depending on the individual service of the supplier, controller or processor.	Depending on the location of the relevant supplier, within or outside the EU.	We only transfer personal data to third countries and/or international organisation to the extent that this is necessary to perform the employment contract with our staff member or the agreement with our contractual partner (point (b) of Article 49 paragraph 1 of the General Data Protection Regulation) and/or to establish, exercise or defend legal claims (point (e) of Article 49 paragraph 1 of the General Data Protection Regulation).
Travel service providers.	Controller.	Within the EU.	-
(Mobile) telephone service providers..	Controller.	Within the EU.	-
Shipping/courier service providers.	Controller.	Within the EU.	-
Training service providers.	Processor.	Within the EU.	-
IT service providers.	Processor.	Within the EU.	
Cooperating IT expert.	Processor. Purpose of the data processing: performing system	Within the EU.	-



	<p>administrator and system monitoring tasks.</p> <p>The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the company.</p>		
Payroll and financial account service provider.	<p>Processor.</p> <p>Purpose of the data processing: billing, accounting, customer identification tasks, payroll services.</p> <p>The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the company.</p>	Within the EU.	-
Er-Kim Affiliates in the EU.	Controller.	Within the EU.	-
<p>Er-Kim companies outside the EU:</p> <ul style="list-style-type: none"> Er-Kim Turkey 	Controller.	Outside the EU.	<p>No applicable adequacy decision of the EU within the meaning of Article 45 paragraph 3 of the General Data Protection Regulation exists.</p> <p>Transfers are subject to EU standard contractual clauses in accordance with Article 46 paragraph 5 of the General Data Protection Regulation.</p>



<p>Contractual partners, representatives and/or advisors of the contractual partner, experts and/or other service providers, insurers.</p>	<p>Controller.</p>	<p>Depending on the contractual relationship, can be within or outside the EU.</p>	<p>We only transfer personal data to third countries and/or international organisation to the extent that this is necessary to perform the employment contract with the Staff member or the agreement with the contractual partner involved in the relevant engagement (point (b) of Article 49 paragraph 1 of the General Data Protection Regulation) and/or to establish, exercise or defend legal claims (point (e) of Article 49 paragraph 1 of the General Data Protection Regulation).</p> <p>[TBD, if the case]</p> <p>No applicable adequacy decision of the EU within the meaning of Article 45 paragraph 3 of the General Data Protection Regulation exists.</p> <p>Transfers are subject to EU standard contractual clauses in accordance with Article 46 paragraph 5 of the General Data Protection Regulation.]</p>
<p>Market analysts.</p>	<p>Controller.</p>	<p>Depending on the relevant market analysts, can be within or outside the EU.</p>	<p>We only transfer personal data to third countries and/or international organisation to the extent that the data subject has given their express consent to the proposed data transfer (point (a) of Article 49 paragraph 1 of the General Data Protection Regulation) or this is necessary to perform the employment contract/mandate agreement or membership with our Staff member (point (b) of Article 49 paragraph 1 of the General Data Protection Regulation).</p> <p>[TBD, if the case]</p> <p>No applicable adequacy decision of the EU within the meaning of Article 45 paragraph 3 of the General Data Protection Regulation exists.</p>



			Transfers are subject to EU standard contractual clauses in accordance with Article 46 paragraph 5 of the General Data Protection Regulation.]
--	--	--	--



C. Information on the rights of data subjects

As a data subject, you have the following rights with regard to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (“right to be forgotten”) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data portability (Article 20 of the General Data Protection Regulation)
- Right to object (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7 paragraph 3 of the General Data Protection Regulation)
- Right to lodge a complaint with a supervisory authority (Article 77 of the General Data Protection Regulation)
- You can contact us for the purpose of exercising your rights using the contact details in [Section A](#).

More detailed information on your rights with regard to the processing of your personal data can be found below:

I. Right of access

As a data subject, you have a right to obtain access and information under the conditions provided in Article 15 of the General Data Protection Regulation.

This means in particular that you have the right to obtain confirmation from us as to whether we are processing your personal data. If so, you also have the right to obtain access to the personal data and the information listed in Article 15 paragraph 1 of the General Data Protection Regulation. This includes information regarding the purposes of the processing, the categories of personal data that are being processed and the recipients or categories of recipients to whom the personal data have been or will be disclosed (points (a), (b) and (c) of Article 15 paragraph 1 of the General Data Protection Regulation).

You can find the full extent of your right to access and information in [Article 15 of the General Data Protection Regulation](#).

II. Right to rectification

As a data subject, you have the right to rectification under the conditions provided in Article 16 of the General Data Protection Regulation.



As a data subject, you have the right to rectification under the conditions provided in Article 16 of the General Data Protection Regulation.

You can find the full extent of your right to rectification in [Article 16 of the General Data Protection Regulation](#).

III. Right to erasure (“right to be forgotten”)

As a data subject, you have a right to erasure (“right to be forgotten”) under the conditions provided in Article 17 of the General Data Protection Regulation.

This means that you generally have the right to obtain from us the erasure of your personal data and we are obliged to erase your personal data without undue delay when one of the reasons listed in Article 17 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (point (a) of Article 17 paragraph 1 of the General Data Protection Regulation).

If we have made the personal data public and are obliged to erase it, we are also obliged, taking account of available technology and the cost of implementation, to take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of those personal data (Article 17 paragraph 2 of the General Data Protection Regulation).

The right to erasure (“right to be forgotten”) does not by exception apply if the processing is necessary for one of the reasons listed in Article 17 paragraph 3 of the General Data Protection Regulation. This can be the case, for example, if the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (points (b) and (e) of Article 17 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to erasure (“right to be forgotten”) in [Article 17 of the General Data Protection Regulation](#).

IV. Right to restriction of processing

As a data subject, you have a right to restriction of processing under the conditions provided in Article 18 of the General Data Protection Regulation.

This means that you have the right to obtain from us the restriction of processing if one of the conditions provided in Article 18 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if you contest the accuracy of the personal data. In such a case, the restriction of processing lasts for a period that enables us to verify the accuracy of the personal data (point (a) of Article 18 paragraph 1 of the General Data Protection Regulation).



Restriction means that stored personal data are marked with the goal of restricting their future processing (Article 4 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to restriction of processing in [Article 18 of the General Data Protection Regulation](#).

V. Right to data portability

As a data subject, you have a right to data portability under the conditions provided in Article 20 of the General Data Protection Regulation.

This means that you generally have the right to receive your personal data with which you have provided us in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from us if the processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation and the processing is carried out by automated means (Article 20 paragraph 1 of the General Data Protection Regulation).

You can find information as to whether an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in [Section B](#) of this Data Protection Information.

In exercising your right to data portability, you also generally have the right to have your personal data transmitted directly from us to another controller if technically feasible (Article 20 paragraph 2 of the General Data Protection Regulation).

You can find the full extent of your right to data portability in [Article 20 of the General Data Protection Regulation](#).

VI. Right to object

As a data subject, you have a right to object under the conditions provided in Article 21 of the General Data Protection Regulation.

At the latest in our first communication with you, we expressly inform you of your right, as a data subject, to object.

More detailed information on this is given below:



(a) **Right to object on grounds relating to the particular situation of the data subject**

As a data subject, you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6 paragraph 1, including profiling based on those provisions.

You can find information as to whether an instance of processing is based on point (e) or (f) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in [Section B](#) of this Data Protection Information.

In the event of an objection relating to your particular situation, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You can find the full extent of your right to objection in [Article 21 of the General Data Protection Regulation](#).

(b) **Right to object to direct marketing**

Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You can find information as to whether and to what extent personal data are processed for direct marketing purposes in the information regarding the legal basis of processing in [Section B](#) of this Data Protection Information.

If you object to processing for direct marketing purposes, we no longer process your personal data for these purposes.

You can find the full extent of your right to objection in [Article 21 of the General Data Protection Regulation](#).

VII. **Right to withdraw consent**

Where an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation, as a data subject, you have the right, pursuant to Article 7 paragraph 3 of the General Data Protection Regulation, to withdraw your consent at any time. The withdrawal of your consent does not affect the legitimacy of the processing that occurred based on your consent until the withdrawal. We inform you of this before you grant your consent.



You can find information as to whether an instance of processing is based on point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation in the information regarding the legal basis of processing in [Section B](#) of this Data Protection Information.

VIII. Right to lodge a complaint with a supervisory authority

As a data subject, you have a right to lodge a complaint with a supervisory authority under the conditions provided in Article 77 of the General Data Protection Regulation.

The supervisory authorities responsible for us are:

- Romania:

Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal (The National Supervisory Authority For Personal Data Processing)

Adress: 010336 Bucharest, 28 -30 General. Gheorghe Magheru Blvd.

Website: <https://www.dataprotection.ro/>;

Email: anspdc@dataprotection.ro

Phone: + 40.318.059.211 /+40.318.059.212

- Bulgaria:

Комисията за защита на личните данни (The Commission for Personal Data Protection)

Adress: София 1592, бул. „Проф. Цветан Лазаров” № 2

Website: www.cpdp.bg

Email: kzld@cpdp.bg



Phone: +359 (02) 91-53-519

- Greece:

Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα (Hellenic Data Protection Authority)

Address: Kifissias 1-3, PC 115 23, Athens, Greece

Website: <http://www.dpa.gr>

Email: contact@dpa.gr

Phone: +30-210 6475600

- Turkey:

Kişisel Verileri Koruma Kurumu (Personal Data Protection Authority)

Address: Nasuh Akar Mahallesi 1407. Sok. No:4, 06520 Çankaya/Ankara

Website: <https://www.kvkk.gov.tr/>

Email: ihlalbildirimi@kvkk.gov.tr

Phone: +90-312 216 50 00



D. Information about the General Data Protection Regulation terminology used in this Data Protection Information

The technical terms relating to data protection used in this Data Protection Information have the meaning used in the General Data Protection Regulation. The full scope of the definitions of the General Data Protection Regulation can be found in [Article 4 of the General Data Protection Regulation](#).

More detailed information on the most important technical terms of the General Data Protection Regulation used in this Data Protection Information can be found below:

- **“personal data”** means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **“data subject”** means the respective identified or identifiable natural person, to which the personal Data refers to;
- **“processing”** means 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;
- **“profiling”** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- **“controller”** means 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **“processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;



- **“recipient”** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- **“third party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- **“international organisation”** means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries;
- **“third country”** means a country which is not a member state of the European Union (“EU”) or the European Economic Area (“EEA”);
- **“special categories of personal data”** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

E. Status of and changes to this Data Protection Information

This Data Protection Information was last modified on 23.11.2023.

It may be necessary to modify this Data Protection Information due to technical developments and/or amendment of statutory or official requirements.

An up-to-date version of this Data Protection Information can be retrieved at any time at : <https://www.er-kim.com/gdpr> or click this [\[link\]](#).

**Appendix 1 Document History And Version Check Registration**

Document Name Data Protection Policy

Writer Taha Mutlu, Legal & Compliance Officer

Approver Mert ZORLULAR, Board Chairman & CFO

Publisher Ahu ÖZGÜR, Quality Manager

Approval Date December 8rd, 2023

Review Date -

Review Period 2 years

Next Review Date December, 2025

Version No	Version Date	Revision Details
00	December 14rd, 2023	Data Protection Policy, First Publish