

I. In General

It has been accepted in international documents and many countries to the processing of personal data reflected in the application There are basic principles regarding 4 of the Law. The procedure for the processing of personal data and The principles are in accordance with Convention No. 108 and European No. 95/46/EC. It was arranged in parallel with the Union Directive. This by; considered in the processing of personal data in the law. The general (basic) principles are:

- Compliance with the law and honesty rules,
- Being accurate and up-to-date when necessary,
- Processing for specific, explicit and legitimate purposes,
- Being connected, limited and restrained with the purpose for which they are processed,
- For the purpose stipulated in the relevant legislation or for which they are processed. maintained for as long as necessary.

Principles regarding the processing of personal data should be at the core of data processing activities and personal data processing activities in accordance with these principles should be carried out.

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A) Law and Integrity Principle of Compliance with the Rules

Compliance with the law and the rule of honesty, personal in the processing of data by laws and other legal act in accordance with the principles established by the regulations signifies the obligation to do so. Honesty In accordance with the principle of compliance with the rule, the data controller persons concerned while trying to achieve their objectives in processing, should take into account their interests and reasonable expectations. About one does not expect and does not have to wait act in a way that prevents consequences from occurring it has to. In accordance with the principle, also for the person concerned that the data processing activity in question is transparent and information and warning obligations of the responsible person must act appropriately.

The principle of being in compliance with the law and the rule of honesty, other principles are also inclusive, to the law compliance with legal norms in general and universal compliance with legal principles, compliance with the law The scope is broad, including regulatory compliance. For example, an illegal practice can also entails illegality.

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Compliance with the rules of honesty is in our law, Civil The honesty rule regulated in Article 2 of the Law, personal data is not violated while processing. This principle is personal regarding the non-abuse of the right while processing the data. requires compliance with the law. Honesty the rule of trust, while using the rights of individuals, as expected of an appropriate and reasonable person means to behave. The limits of the honesty rule, expected from an objective person in every concrete case is determined by the behavior, the subjective situation of the people is taken into consideration. is not taken into account. There is a violation of the rule of honesty in cases where it is possible, the person uses his right and acting within its limits, but contrary to the purpose of the right the way it moves.

Honesty in terms of protection of personal data rule, it is necessary for individuals to process data themselves, based on the rules of law that authorizes or orders for the purpose of this rule of law in their acts processing the least possible amount of data, not acting in a way that people cannot foresee require such behavior.

interests of data controllers, data subjects and reasonable take into account their expectations, the honesty rule is required, private person without justification, data in a way that violates the privacy and dignity of your life.

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processing will undoubtedly constitute a violation of this principle. For example, within the framework of privacy, reasonable requesting or requesting data that is not against the rules of honesty by the data controller processing is against this principle.

Integrity rule, through other principles of data protection embodied with. Without complying with these principles, the data processing is in accordance with the rule of honesty and therefore law. will be contrary to data processing.

For example, deletion of personal data before a legal entity technical storage and protection of data and by those responsible for its backup Although access to data is possible, storage of data within the said legal entity, the number of persons responsible for the protection and backup in the event that it is determined more than necessary, by these persons providing access to deleted personal data integrity would violate the rule.

Whether this principle is applicable Within the scope of the fundamental rights and freedoms regime of the Constitution must be evaluated. Processing of personal data, means an interference with a person's fundamental rights, and that this interference is considered fair and lawful, fundamental rights and freedoms of the Constitution.

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comply with the restrictions mandatory. Emphasis on legality One of the most important points that needs to be means the legal system. The law of a data processing authorized, even commanded, by presumed that it is lawful.

B) Correctly and When Necessary Up-to-Date Principle

Importance of accuracy and timeliness of personal data With this principle emphasizing this, the relevant person stipulated in the Law, the right to request correction of data is compatible. Keeping personal data accurate and up-to-date, relevant as well as in the interest of the data controller, for the protection of the fundamental rights and freedoms of the individual. is also necessary. Personal data is accurate and necessary active care to ensure that it is up to date obligation; data controller based on this data if it reveals a result about the person concerned applies (for example, lending transactions). Except this The data controller always provides the information of the person concerned correctly and It should keep the channels open to ensure that it is up to date.

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Personal information that is out of date or incorrectly maintained material and moral damage due to data possible. For example, a data controller phone number registered in the system is not correct or is no longer used by the person concerned, o erroneous because it does not reflect real data about the person. can cause results. Again, the address information of a person registered incorrectly belongs to himself failure to receive notifications in a timely manner or to the wrong person In case of notification, the person concerned is material and moral, as well as be harmed. This principle protects the rights of the person concerned, as well as for the interests of the data controller.

In order to keep personal data accurate and up-to-date: The sources from which personal data are obtained must be specific, personal data The accuracy of the source from which the data is collected should be tested, Requests due to inaccuracy of personal data should be taken into account and precautions should be taken.

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C) Specific, Clear and Legitimate Principle of Processing for Purposes

The purposes of processing personal data are specific, legitimate and clear. the principle of being;

- Personal data processing activities by the person concerned. be clearly understandable,
- Which legal process of personal data processing activities ascertained based on the condition to be made,
- Personal data processing activity and this activity will provide clarity of purpose to be presented in detail

provides.

This policy clearly states the data processing purpose of the data controller. and precisely determine and that this purpose is legitimate makes it mandatory, data controllers, data for other purposes other than the purposes they have indicated to the person their responsibilities due to these acts, will arise. If the purpose is legitimate, the data controller

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the data he processes, the work he has done or presented means that it is connected to and necessary for the service. is coming. For example, a clothing store legitimate purpose for customers to process name-surname information It is legitimate to carry the mother's maiden name-surname while will not be considered within the scope of the purpose.

Only the data controller for the purposes of processing personal data known or predictable in terms of is against the principle. In this respect, the purposes of personal data processing in the legal proceedings and texts (explicit consent, lighting, answering the applications of the person concerned, data specificity and clarity should be sensitive in compliance with the principle of technical legal The use of terminology should be avoided. On this basis compliance, as well as compliance with the principle of honesty also important in terms of

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D) For The Purpose For Which They Are Processed Connected, Limited and Metered Principle of Being

processed data determined your goals to be feasible, the purpose not related to the realization or need avoiding the processing of unheard personal data requires. Again, the later emergence to meet the potential needs data should not be processed, because it is probable data processing for needs, a new data processing means activity. In this case, 5 of the Act.

Processing of personal data regulated in Article one of the conditions must be met, also data processed only for the realization of the purpose will be limited to the personal data required. Goal data processing other than necessary for would violate the principle. The important thing here is providing sufficient data to achieve the objective not necessary for any other purpose avoiding data processing, not available and personal use for intended purposes data should not be collected or processed.

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The principle of proportionality, realization with data processing Striking a reasonable balance between the desired goal means. That is, the purpose of data processing means to make it happen. For example, credit social life and social life of the person applying for the card. information about their preferences for social activities request is contrary to the principle of proportionality. will be able to.

D) Envisioned in the Related Legislation or For The Purpose For Which They Are Processed As Long As Required Principle of Conservation

As a requirement of the "limitation of purpose principle" of personal data in accordance with the time required for the purpose for which they are processed, must be preserved. In this regard, the data controller, responsible for taking administrative and technical measures. of the law As stated in Article 12, the data controller; personal to prevent unlawful processing of data, to prevent unlawful access to data, and appropriate for the protection of personal data, all necessary measures to ensure the level of security must take technical and administrative measures.

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In this regard, the data controller, personal data storage and disposal policy and principles, storage durations and the technical and to determine administrative measures and to protect personal data on these principles, responsible for its proper preservation.

Purpose limitation principle for the storage of personal data storage determined by the data controller in accordance with as well as the relevant periods to which the data controller is subject. Storage periods determined within the scope of the legislation available. According to this; data controllers, relevant personal data. If there is a period stipulated in the legislation for will; if such a period is not foreseen, only for as long as is necessary for the purpose for which they are processed. will be able to store it. For further data storage if there is no valid reason, that data will be deleted, will be destroyed or anonymized. In the future reusable or any retention of personal data for other reasons will not be able to go his way.

In addition, the data controller, pursuant to Article 16 of the Law, Processing of personal data when applying for registration Data Controllers Registry for the maximum time required for the purpose Considering Article 9 of the Regulation on detecting and reporting this period has to.

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Data notified to the Registry by the data controller processing purposes of the categories and maximum storage required for their processing as The duration of the expiry and the periods stipulated in the legislation are different, may be. In this case, maximum protection in the legislation If a period of time is foreseen, this period is foreseen; or this category of data based on the longest Notification is made to Sicily.

It should be noted here that the legislation made in order to comply with these periods stipulated in the scope of storage activities determined by the data controller exceeds their retention period, these activities are only fulfilling the obligations laid down in the legislation should be conducted as a limited storage and processing activity. In accordance with the legal obligations of the data controller the periods stipulated within the scope of the legislation to which it is subject, and the retention periods determined by the data controller. In case of exceeding the personal data data controller deleted, destroyed or anonymized by must be brought.

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