

GÜVEN EDUCATION AND HEALTH FOUNDATION

PROCEDURE OF TRAINING ON AWARENESS OF PERSONAL DATA PROTECTION

Güven Education and Health Foundation (the “**Foundation**”), acting in the capacity of Data Controller, has issued this Procedure of Training on Awareness of Personal Data Protection in accordance with the Personal Data Protection Law No. 6698 (“**Law**” or the “**PDPL**”).

The Procedure of Training on Awareness of Personal Data has been developed by the Foundation to organize the necessary trainings for informing and raising the awareness of the Employees about the compliance with the provisions of the Law and legislation.

A. Definitions

“Explicit Consent”	It implies the consent on a specific matter based on information and free will.
“Employee”	It implies a natural person who has an employee-employer like relationship with the Foundation based on an employment contract or an agency contract.
“Law” or “PDPL”	It implies the Personal Data Protection Law (Law No: 6698)
“Personal Data”	It implies any and all data that is related to an identified or identifiable natural person.
“Personal Data Processing Inventory”	It implies the inventory that data controllers create by associating the Personal Data processing activities they carry out depending on their business processes with the purposes and legal basis of Personal Data processing, the data category, recipient group and data owner group, and by detailing the maximum retention period required according to the purposes for which the personal data are processed, personal data foreseen to be transferred to foreign countries and the measures taken in terms of data security.
“Committee”	It implies the Personal Data Protection Committee.
“Sensitive Personal Data”	It implies information about race, ethnic origin, political opinion, idea of life, religion, and sect or other beliefs, appearance, association, foundation or union membership, health status, sexual life, criminal conviction, cautionary attachment and biometric and genetic data.
“Procedure”	It implies this Procedure and all of other policies that can be adopted in the future.
“Process”	It implies each data processing activity that is covered by the Personal Data Processing Inventory.
“Data Controller”	It implies a natural or legal person who determines the purpose of personal data processing and means of data processing and is responsible for installing and managing a data recording system.

“Data Controller Contact Person”	It implies the natural person notified by the Foundation during registration with the Data Controllers Registry in order to ensure communication with the Authority regarding its obligations under the Law and the secondary regulations to be issued based on this Law.
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B. Scope and Aim

The Foundation, acting in the capacity of the Data Controller, has issued this Procedure pursuant to the Law and provisions of other legislation. This Procedure has been prepared to determine how the trainings that should be necessarily given to Employees of the Foundation will be organized in order to ensure implementation of the provisions of the Law for any and all Personal Data and Sensitive Personal Data processed by and/or on behalf of the Foundation.

C. Education

The Foundation is obliged to take technical and administrative measures for the protection of all Personal Data and Sensitive Personal Data Processed in its capacity as Data Controller, to continuously monitor developments and administrative activities, to prepare the necessary procedures and to announce them within the Foundation and to ensure compliance with them. In this context, the Data Controller organizes the necessary trainings to increase the awareness of the employees.

The Foundation provides its Employees with the necessary trainings on protection of the personal data pursuant to the Law and the relevant legislation in order to ensure that all Employees of the Foundation act in accordance with the regulations within the scope of this Procedure, the Law and the relevant legislation. Relevant trainings will be repeated periodically once a year. Moreover, these trainings will be combined with orientation trainings for new employees. All amendments in the legislation and the Committee decisions will also be added to the periodic trainings; emergency intervention and the rules to be followed immediately will also be e-mailed to the employees, and additional trainings may be organized for such conditions.

These trainings will specifically address the definitions of Sensitive Personal Data and the practices to protect thereof. The trainings may be carried out by taking into account the nature of the Personal Data processing activity specific to the processes that the Employees deal with and / or are responsible for, but collective trainings on the roles and responsibilities or general information about personal data security can be organized, regardless of the position of employees working for the Data Controller.

These trainings that will be organized pursuant to the Law and relevant regulations will address all issues that the Data Controller should pay attention to pursuant to the Law, relevant legislation and other regulations set by the Committee, including but not limited to the processes carried out on the basis of departments, the nature of the Personal Data processing activity, the administrative and technical measures applied by the Data Controller, the content of the Personal Data Processing Inventory, the disposal and storage policy, the clarifications to be made during Personal Data processing activities and the Explicit Consents to be obtained from Third Parties when necessary, categories of processed Personal Data, purposes of data processing, purposes and processes of data storage and transfer, administrative and technical measures applied by the Foundation and how they will be applied.

In addition to the above, the Employees will also be trained about what can be done for cyber security in order to ensure the security of personal data and to make the first intervention even if the Employees have limited knowledge about cyber security and attacks that may damage the security of Personal Data.

D. Performance of Trainings

Trainings can be carried out by the Foundation, acting in the capacity of the Data Controller, through its own organization or can be outsourced to training companies or consultancy/law offices that they provide the Foundation with service, if deemed necessary.

In principle, trainings take place at annual intervals.

If the training service is outsourced, the relevant training documents and materials should be shared with the human resources department a reasonable time before the training date. The Human Resources Department will also share the training documents and materials with the Employees after the training.

If the trainings will be carried out using internal resources of the Foundation, they will be carried out jointly by human resources department and the Data Controller Contact Person, and the training schedule will be determined by the human resources department in order to ensure the participation of all employees of the Foundation.

Necessary trainings on the Law and related regulations are included in the orientation program for new employees

Reviews and quizzes can be given to the participants after the training.

E. Creating the Training Participation Lists

A training participation list will be created at the end of the each training and the Employees will be asked to sign these lists. These lists will then be kept by the Human Resources Department and a copy will be shared with the Data Controller Contact Person.

Action will be taken against Employees who do not attend the training without any valid excuse or do not apply the information presented during the training.

The effective date of this Procedure is 01/06/2024 and if all or certain articles of the Procedure are revised, the effective date of the Procedure will be updated according to the relevant revision date.