

	PRIVACY NOTICE (PDP LAW)	Document No:	KVKK-F-02
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MARM ASSISTANCE
GENERAL DISCLOSURE ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Hereby, Marm Assistance Destek Hizmetleri A.Ş. (“Marm”) informs and explains its personal data processing activities pursuant to Article 13 of the European Union General Data Protection Regulation (“GDPR”) and Article 10 of the Law on the Protection of Personal Data No. 6698 (“PDP Law”).

1. DATA CONTROLLER

As per GDPR and the PDP Law, Marm Assistance, acting as the data controller, may process, record, store, classify, and update personal data for the purposes set out herein, in compliance with the law and the principle of good faith, and may transfer or disclose such data to third parties limited to the purposes of processing and/or within the scope permitted by legislation.

2. CATEGORIES OF PROCESSED PERSONAL DATA

Depending on the group of data subjects, Marm Assistance may process the following categories of personal data:

- Identity Data: Name, surname, national ID number, passport, date of birth, marital status, nationality, etc.
- Contact Data: Phone number, e-mail address, residential address, corporate contact information.
- Financial Data: Bank account details, IBAN, invoicing and account records, payment information.
- Education and Professional Data: CV, diploma, certificates, professional experience, reference details.
- Visual and Audio Data: Photographs, voice recordings, CCTV camera records.
- Special Categories of Personal Data: Health reports, blood type, occupational health and safety records, criminal record, disability information.
- Location Data: HGS toll data, fuel card transaction location data (limited to corporate purposes).
- Transaction Security Data: IP addresses, log records, user account details.
- Customer Transaction Data: Call center recordings, complaints, satisfaction surveys.
- Visitor Data: Visitor logs, building entry–exit records, CCTV footage.

Further details regarding personal data categories are available in Marm Assistance’s **Policy on Protecting and Processing Personal Data**.

3. PURPOSE OF PROCESSING PERSONAL DATA

Marm holds personal data of its employees, candidates, trainees, references, trainers, visitors, service providers, medical escorts, on-site doctors, employees’ relatives, brand customers, customers, insurance policy holders and their relatives, brand representatives, and potential customers. Such personal data categories are detailed in document named **Policy on Protecting and Processing Personal Data**.

Marm processes data owners’ data in line with the purposes detailed below;

- Conducting operational processes and reporting for data owners related to the contracts signed with our customers called as data controller,
- Providing Technical, Medical, Travel and operational services of Marm,
- Assessing suitability of candidates and trainees to criteria defined in personnel recruitment, ensuring future communication with these candidates,
- Carrying out Human Resources activities in compliance with the law, including drafting employment contracts, implementing disciplinary procedures, providing fringe benefits such as private health insurance and transportation, calculating annual leave, payroll, salary payments, performance measurement and evaluation, organizing social activities, and communication in case of emergencies,
- Contacting employees and relevant parties promptly in emergencies, issuing emergency and ID badges,
- Recording voices for maximizing customer satisfaction, assessing customer complaints and requirements, and giving feedback to customers,
- Organizing orientation, information security and other trainings, measuring effectiveness of outsourced trainings,
- Executing data processing, approving information security policies, carrying out user requests, following up debited equipment,
- Monitoring location data derived from toll systems (HGS) and fuel card usage for corporate vehicles, for the purpose of task and expense tracking,
- Conducting legal problems occurring in and out of Marm, complying with judicial authorities’ requirements,
- Submitting personal data to judicial authorities in case of legal disputes,
- Ensuring corporate security of Marm,
- Keeping written records of visitors arriving in Marm and ensuring corporate security with security cameras; taking id and communication details of visitors for providing Wi-Fi passwords in line with the legal liabilities,
- Executing Marm Medical services (e.g. patient transfers, air ambulance, translation, hotel/accommodation, funeral services, medical equipment provision, hospital and on-site medical services, local representatives and medical escort arrangements) in compliance with the “Regulation on International Health Tourism and Tourist Health” and contractual obligations, invoicing accordingly, and ensuring customer satisfaction,
- Executing Marm Travel services (e.g. ticketing, hotel, visa, rent-a-car, and tour arrangements) in line with customer contracts, issuing travel insurance, fulfilling reporting obligations to competent authorities, invoicing, and ensuring customer satisfaction,
- Executing Marm Technical Operations services (e.g. roadside assistance, towing, rent-a-car services, as well as hotel, accommodation, transfer, and ticket arrangements) in compliance with contracts signed with data controllers, invoicing accordingly, and maximizing customer satisfaction,
- Performing accounting and finance processes including invoicing, reporting, account reconciliation, and payments in line with applicable legislation,

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- Carrying out Occupational Health and Safety obligations, including contacting relevant persons and institutions in emergencies, completing mandatory employee OHS trainings, conducting pre-employment and periodic medical examinations and keeping related records, obtaining OHS commitments from employees, and submitting reports to competent authorities during inspections,
- Ensuring the continuity of services agreed with product and service providers, maintaining communication with such providers, issuing permits for on-site work, and carrying out procurement activities,
- Managing contractual processes with customers and maintaining communication,
- Promoting and advertising Marm's services to existing and potential customers through organizations, events, conferences, and meetings, and maintaining future communication.

For further details, please see **Policy on Protecting and Processing Personal Data** on our website <http://www.marmassistance.com.tr>

4. RETENTION AND DISPOSAL OF PERSONAL DATA

Personal data processed by Marm Assistance is retained in accordance with statutory minimum retention periods, processing purposes, and the Company's legitimate interests.

Examples of retention periods include:

- Employee personnel records: 10 years following termination of employment,
- Health and occupational safety data: Minimum 15 years (as required under Occupational Health and Safety Law No. 6331),
- Customer transaction records: 10 years following termination of the relevant contract,
- Financial and invoicing records: 5 years (as required by the Tax Procedural Law),
- CCTV recordings: Up to 25 days,
- Visitor logs: 2 years.

At the end of these periods, personal data is deleted, destroyed, or anonymized in line with Marm Assistance's Personal Data Retention and Disposal Policy.

For further details, please see **Personal Data Storage and Disposal Policy** on our website <http://www.marmassistance.com.tr>

5. DATA DISCLOSURE AND TRANSFER

Safeguarding public interest and in accordance with the basic principles of PDP Law as well as the conditions and purposes of personal data processing stated in its 8th and 9th articles, Marm shall be transferring personal data of its customers and employees to the related parties it is cooperating, including public authorities, brand authorities, call quality monitoring companies, consultancy and supplier companies, service providers, insurance companies, auditing institutions, contracted law offices, Marm departments and contracted banks. In accordance with the legislation and legal compulsions, personal data can be shared with public institutions and other institutions.

Marm shares photographs and images from its events, meetings, and organizations on social media only upon obtaining the explicit consent of the relevant individuals.

Marm may transfer personal data abroad in accordance with the procedures set out under the PDP Law, either based on the data subject's explicit consent or by implementing the standard contractual clauses approved by the Personal Data Protection Authority, limited to its data controller customers and the contracts signed for the services provided.

6. METHODS AND LEGAL GROUNDS FOR COLLECTING PERSONAL DATA

Personal data is collected in both electronic and physical environments. Processing is based on the explicit consent of the data subject pursuant to Article 5 of the GDPR and Article 4(2) of the PDP Law, or, where applicable, on the legal bases stipulated in Article 6 of the GDPR and Articles 5(2) and 6(3) of the PDP Law, such as: legal obligation, legitimate interest, establishment or exercise of a right, public disclosure, compliance with contractual obligations, verbal or written declarations, manual submission, visual and audio recordings, and technical applications (e.g. CRM, log management, toll/HGS and fuel card tracking systems).

Where personal data is not directly provided to Marm Assistance by the data subjects, insurance companies and brand customers are obliged to inform data subjects and obtain their explicit consent before transferring personal data (such as policy numbers, customer identification details, and service information) to Marm Assistance.

In the case of cross-border data transfers, Marm Assistance may rely either on the explicit consent of the data subject or on the standard contractual clauses approved and published by the Personal Data Protection Authority.

7. RIGHTS OF DATA SUBJECT

Data subject has the right to apply to Marm for the rights related to personal data processing. These requests shall be concluded by Marm latest in thirty days and free of charge. However, in case Personal Data Protection Board determines any fee, Marm shall charge accordingly.

Data subject has the following rights regarding the personal data;

- To be informed whether his/her personal data is processed or not,
- To request information if the personal data is processed,
- To learn the purpose of processing the personal data and whether the data is used for the corresponding purposes,
- To get information on the third parties to whom the personal data is transferred in the country and abroad,
- In case the personal data is processed incompletely or inaccurately, to request the correction,

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- To request deletion or disposal of personal data
- To request that such correction, deletion or disposal is notified to the third parties to whom the personal data is transferred,
- To appeal to the negative results against himself/herself through the analysis of data processed exclusively by automatic systems
- To request compensation upon any kind of loss arising from personal data processing contrary to PDP Law.

8. COMMUNICATION METHODS

Within the scope of GDPR and PDP Law, all rights related to personal data shall be executed by the following methods;

8.1. MARM ASSISTANCE Contact Details;

Data Controller: Marm Assistance Destek Hizmetleri A.Ş.

Personal Data Application Form (www.marmassistance.com.tr) shall be filled out for personal data applications.

Applications shall be made through;

In person: Harmandere Mah. Ankara Cad. AirPort Plaza No:486, 34912 Pendik/ Istanbul

Email : marm@hs03.kep.tr

Cargo : Harmandere Mah. Ankara Cad. AirPort Plaza No:486, 34912 Pendik/ Istanbul

For full follow up of applicants' legal right of 30 days, applications to be sent by courier shall be notarized and return receipt requested. Such applications shall be admitted by Marm further to identity validation and replied in written or by email.