

MARM ASSISTANCE
GENERAL DISCLOSURE ON PROTECTING AND PROCESSING PERSONAL DATA

Herein with this statement, Marm Assistance (“Marm”), shall inform and explain its activities related to processing personal data as per the 13th article of European Union General Data Protection Regulation (GDPR) and 10th article of Law on Protection of Personal Data numbered 6698 (“PDP Law”).

1. DATA CONTROLLER AND IT’S REPRESENTATIVE

As per GDPR and PDP Law, Marm, as data controller, shall be processing, recording, saving, classifying and updating all kinds of personal data for the following purposes in conformity with PDP Law and code of ethics as well as transferring to/briefing 3rd parties limited by the purpose of processing and/or the limitations permitted by the legislation.

2. 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 line with the related law, forming employee contracts, performing disciplinary procedures, ensuring fringe benefits as private health insurance and transportation, calculating annual leave days and scorings, paying salaries, measuring and assessing performances, organizing social activities, communicating in case of emergencies,
- Getting in touch with our employees and related parties timely in case of emergency, organizing emergency and identity 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 information of Marm’s vehicles for tracking,
- Conducting legal problems occurring in and out of Marm, performing requirements of judicial authorities,
- Presenting 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; transfer, air ambulance, translation, hotel/accommodation, funeral, medical equipment supply, hospital and on-site medical services, local agent and medical escort arrangements; carrying out these services in line with “Regulation on International Health Tourism and Tourist Health” and customer contracts, invoicing accordingly and ensuring customer satisfaction,
- Executing Marm Travel services as ticket, hotel, visa, rent-a-car, tour arrangements in line with customer contracts, issuing travel insurance, giving required information to related authorities, issuing invoices, ensuring customer satisfaction,
- Executing Marm Technical Operations services; road assistance, towing, rent-a-car services as well as hotel, accommodation, transfer, ticket arrangements, invoicing and maximizing customer satisfaction in line with the contract signed with Data Controller.
- Performing invoicing, reporting, current account detailing and payment activities in line with the legislations,
- Carrying out Occupational Health and Safety provisions; getting in touch with related persons and institutions in states of emergencies, completing employee trainings on Occupational Health and Safety, applying physical examination for employment and regular checks and keeping their records, getting employees’ commitment to Occupational Health and Safety, and submitting reports to auditing institutions,
- Sustaining continuity of services defined in contracts signed with product and service providers, ensuring communication with these providers, issuing permits for in house workshops and performing purchasing activities,
- Carrying out contractual processes with customers and keeping communication with them,
- Promoting and advertising Marm services to current and potential customers at organizations, events, conferences and meetings, and enabling future communication with them.

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

3. DISPOSAL OF PERSONAL DATA

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

4. DATA DISCLOSURE

IT IS PROTECTED DOCUMENT OF MS. IT SHALL NOT BE COPIED WITHOUT PERMISSION. ITS PRINT OUT IS CLASSIFIED AS UNCONTROLLED COPY.

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 measuring 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 pictures of its events, meetings, and organizations on social media upon explicit consent.

Marm may transfer personal data abroad by obtaining explicit consent, limited to its data controller customers and contracts signed for provided services.

5. METHODS AND LEGAL GROUNDS OF COLLECTING PERSONAL DATA

Personal data is collected electronically or physically. Personal data shall be obtained by relevant person's explicit consent in accordance with the 5th article of GDPR and the principles stated in article 4(2) of PDP Law or in accordance with the 5th article of GDPR or the articles 5(2) and 6(3), upon implication by Law, legitimate interest, granting rights, publicizing, performing legal obligations by data controller, obtaining verbal and written statement, manual delivery, visual records and applications (GPS, CRM, Log Management) based on the execution of contracts. Methods and legal grounds of collecting personal data are detailed in **Policy on Protecting and Processing Personal Data**. For the cases where data owners do not transfer data to Marm, insurance companies and brand customers shall disclose policy numbers, customer ID details and service details to Marm, provided that insurance companies and brand customers shall clarify with data owners and gain their explicit consent.

6. 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,
- 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.

7. COMMUNICATION METHODS

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

7.1. 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.