

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF EMPLOYEES / EMPLOYEE CANDIDATES / INTERNS

This Privacy Notice has been prepared by our Company as the data controller in accordance with Article 10 of the Personal Data Protection Law (PDPL) No. 6698 and the Regulation on the Procedures and Principles for Fulfilling the Obligation to Inform.

We take the utmost care and effort to process your personal data in accordance with the law.

We process your personal data based on legal grounds (Articles 5 and 6 of the PDPL) and taking into account the principles listed below (Article 4 of the PDPL):

- Complying with the law and principle rules
- Being truthful and relevant when necessary
- Being processed for specific, explicit, and legal purposes
- Being relevant, limited, and proportionate to the purpose for which they are processed
- Retention for the duration required by relevant legislation or as necessary for the purposes they are processed.

In addition, we take all necessary protection measures to ensure the appropriate level of security in order to prevent unlawful processing of your personal data and to prevent illegal access to your personal data, and to ensure the protection of your personal data.

Information will be provided in headings in our Privacy Notice.

1. OUR IDENTITY AS THE DATA PROCESSOR

Title: Cortex Havacılık ve Turizm Ticaret A.Ş. (Southwind Airlines)

Mailing address: Mehmetçik Mah. Aspendos Bulvarı No:73 | Muratpaşa / Antalya

E-mail address: kvkk@southwindairlines.com

Registered Electronic Mail (REM) address: cortexhavacilik@hs04.kep.tr

Phone number: +90 242 5055300

Website: www.southwindairlines.com

2. OUR METHODS OF COLLECTING PERSONAL DATA

We may collect personal data through written communication, phone calls, websites, e-mails, mobile applications, our social media accounts, instant messaging applications, computers, and other smart devices.

3. PERSONAL DATA WE PROCESS

The personal data processed by our company are categorized as follows:

Identification (first name, last name, names of parents, gender, date of birth, place of birth, marital status, nationality, passport number, Turkish ID number, detailed civil registry information, driver's license information, photograph)

Contact information (e-mail address, contact address, phone number)

Location (information about your location)

Personnel records (payroll information, disciplinary investigation records, employment start and end documentation, resume information, performance evaluation reports,

military status information, leave records, employment record information, social security information, social security identification number)

Areas of interest

Legal Process (information in correspondence with judicial authorities, information in the case file)

Flight information (booking/ticket details, luggage information, meal preferences)

Advanced passenger information: (API and PNR information)

Employee process (request information, allowance/advance information)

Physical Space Security (employee entry and exit records, camera recordings)

Process Security (IP address information, website entry and exit information, passwords and passcodes)

Risk Management (information processed to manage commercial, technical, administrative risks)

Finance (bank account no, IBAN no)

Professional experience (diploma information, attended courses, in-service training information, certificates, job title, job-related information)

Visual and audio recordings (visual and audio recordings)

Biometric data (biometric photograph)

Union membership (union membership information)

Medical records (information related to disability status, blood type information, personal health information, information on devices and prosthetics)

Criminal conviction and security measures (information related to criminal convictions and security measures)

4. OUR PURPOSES FOR PROCESSING YOUR PERSONAL DATA AND LEGAL JUSTIFICATIONS WE USE FOR PROCESSING YOUR PERSONAL DATA

OPERATION/ PROCESS	CATEGORIES OF PROCESSED PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL JUSTIFICATION
Management Operations	identification, contact information, personnel records, financial information, professional experience	execution of management operations	stipulated by law (Article 5/2/a of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Business operations and oversight	identification, contact information, location, professional experience, personnel records, risk management, physical space security, financial information, flight information, advanced passenger information, biometric data	execution/oversight of business operations execution of operations in accordance with the legislation organization and event management execution of assignment processes	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)

		ensuring the security of data controller operations execution of risk management processes execution of emergency management processes informing authorized institutions and organizations	
Finance and accounting operations	identification, financial information, employee process, personnel records	execution of finance and accounting operations	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL)
Application processes for candidates and the selection and placement processes for candidates/ interns	identification, contact information, personnel records, professional experience, medical records, criminal conviction, and security measures	execution of the application processes of candidates execution of candidate/inter n selection and placement processes	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
processes for the fulfillment of obligations arising from the employment contract and legislation for employees	identification, contact information, personnel records, financial information, professional experience, biometric data, union	fulfillment of employment contracts and legislative obligations for employees	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL)

	membership, medical records, criminal conviction, and security measures		
occupational health/safety operations	identification, contact information, professional experience, physical space security, medical records	execution of occupational health/safety operations	stipulated by law (Article 5/2/a of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Operations to ensure the security of physical space	identification, contact information, physical space security, visual recordings	ensuring physical space security	fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Benefits and advantage processes for employees	identification, contact information, financial information, professional experience, union membership, medical records	implementing benefit and advantage processes for employees.	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Operations to ensure business continuity	identification, contact information, personnel records, professional experience, physical space security	execution of operations to ensure business continuity	establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Performance evaluation processes	identification, contact information, personnel records, professional experience, financial information	execution of performance evaluation processes	establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)

Operations for monitoring requests/complaints and legal affairs	identification, contact information, employee process, financial information, legal process	monitoring of requests/complaints informing authorized institutions and organizations oversight and execution of legal affairs	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) the necessity of processing data for the establishment, use, or protection of a right (PDPL Article 5/2/e) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Ensuring the security of movable property and resources	identification, contact information, location, professional experience	ensuring the security of movable property and resources	establishment/execution of the contract (Article 5/2/c of the PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Training operations	identification, contact information, personnel records, financial information, professional experience, visual and audio recordings, medical records	execution of training operations	stipulated by law (Article 5/2/a of the PDPL) establishment/execution of the contract (Article 5/2/c of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)
Information security operations	identification, contact information, process security	execution of information security operations	stipulated by law (Article 5/2/a of the PDPL) fulfillment of a legal obligation (Article 5/2/ç of PDPL) legitimate interest of the data controller (Article 5/2/f of the PDPL)

5. TO WHICH PARTIES AND FOR WHAT PURPOSES THE PROCESSED PERSONAL DATA MAY BE TRANSFERRED

We may transfer your personal data to persons/institutions and organizations with the status of data processor/data controller to fulfil the obligations arising from the employment contract and legislation for employees, execution of financial and accounting affairs, oversight and execution of legal affairs, execution of emergency management

processes, execution of training operations, execution of assignment processes, execution of operations in accordance with the legislation, execution of risk management processes, ensuring the security of data controller operations, execution of benefits and advantages processes for employees and execution/oversight of business activities.

Individuals/institutions/organizations to whom we make transfers are listed below:

- Our business partners and suppliers: banks, insurance companies, other service providers (such as information technology, payment systems, catering, transportation/accommodation, and consultancy service providers)
- Competent authorities (such as civil aviation, customs, law enforcement authorities) to ensure public and flight safety in accordance with national and/or international legislation
- Authorities authorized to receive information under national and/or international legislation (such as courts, medical and regulatory authorities)

We transfer your personal data by taking appropriate protection measures. When determining and implementing these measures, we act in accordance with the requirements set by the legal regulations applicable in Turkey and other relevant countries.

6. OTHER RIGHTS OF RELEVANT INDIVIDUALS LISTED IN ARTICLE 11 OF THE PDPL

You can submit your requests within the scope of your rights specified in PDPL Article 11 using the contact information provided in the 'OUR IDENTITY AS THE DATA PROCESSOR' section of our Clarification Text, in accordance with the provisions of the Regulation on Application Procedures and Principles to the Data Controller. If your application is in writing, you must deliver it in person or via notary, using a secure electronic signature, mobile signature, or send it from the email address you previously provided and registered in our system, or to our registered electronic mail (REM) address. You may also use the Application Form we have prepared within the framework of PDPL Article 13 and the Regulation on Application Procedures and Principles to the Data Controller.