

CLARIFICATION TEXT FOR TURKCELL EMPLOYEE CANDIDATES

Personal data within Turkcell group companies ^[1] (hereinafter collectively *referred to as "Turkcell"*) is protected under Turkcell's framework. In compliance with the Law No.6698 on the Protection of Personal Data ("Law"), Turkcell implements necessary technical and administrative measures to ensure secure storage and lawful processing of personal data by leveraging its technological and infrastructural capabilities.

The personal data of candidates applying for employment with Turkcell are processed in compliance with the Law and applicable regulations. This document provides detailed information about the personal data Turkcell may process, the purposes of such processing, the parties to whom such data may be transferred, the methods and legal grounds for collection, and candidates' rights regarding their personal data.

This text, which we have prepared for informative purposes, includes information on the personal data that may be processed, the processing purposes thereof and the parties to whom personal data are transferred within the framework of transparency in order to cover all our Employee Candidates. Since the aspects such as position applied for, working conditions or explicit consent, etc. may vary from person to person, not all the information provided below will be applicable for every Employee Candidate.

I. Personal Data of Employee Candidate

Personal data means information that determines or makes your identity determinable. The personal data of Employee Candidates processed within the framework of Human Resources (HR) recruitment processes are as follows:

- Basic personal information (name, surname, date of birth, mobile phone number, email address, correspondence address, Turkish ID number)
- Curriculum vitae (CV), education background, professional skills, work experience, and references
- Information related to the position applied for and the application channel used
- Information on whether the Candidate Employee has any relatives who previously employed in our company, group company or other operator companies,
- Data shared by the candidate during the application and interview process, as well as
- interview records
- Audio and video recordings obtained via remote online interviews or assessments, if applicable
- Information derived from reference checks or inquiries conducted with the candidate's knowledge and consent (information provided about you by your references or information obtained from your university within your knowledge and upon your consent)
- Personality test results and evaluations from other assessments, questionnaires, or inventories
- Outcomes of job application evaluations and decisions

Since the recruitment process may vary depending on the position and working conditions, the personal data categories specified herein may not apply to every Employee Candidate. Should any personal data not listed herein be requested or obtained, the Employee Candidate will be informed in accordance with the Law and applicable legislation.

II. Purpose, Method and Legal Basis of Processing Personal Data

Within the scope of Turkcell HR recruitment processes, the personal data of Employee Candidates is collected for the purposes outlined in this section. This data is obtained through job applications submitted via internal and external channels, face-to-face or remote interviews, information collection tools of Turkcell and its HR business partners, as well as various written, verbal, and electronic media. The data is processed using fully automated, partially automated, or manual methods, in compliance with Articles 5 and 6 of the Law.

- **If expressly stipulated in the laws to which Turkcell is subject;**

Personal data regarding the basic information of the Employee Candidate, the position applied for, and the evaluations and outcomes of the job application are processed for the purposes of conducting recruitment processes, making job offers, and assessing positions, salaries, and benefits.

- **If it is necessary to process the personal data of the contracting parties, provided that it is directly related to the establishment or performance of a contract;**
- Personal data regarding the basic information of the Employee Candidate, including their CV, education, knowledge, work experience, and references, as well as the position applied for, job application details, and whether the Employee Candidate has a relative previously employed by our company, a group company, or other operator companies, are processed. This also includes information shared during the application and interviews, interview records, data obtained through company-conducted research, evaluations of the application, and the outcome of the application. These data are processed for purposes such as conducting recruitment processes, evaluating applications, communicating with Employee Candidates, administering tests and exams, conducting and assessing interviews, making job offers, and evaluating positions, wages, and benefits.

- **If it is necessary for fulfillment of Turkcell's legal obligations;**

The Personal Data of the Employee Candidate listed in this Clarification Text will be processed in cases where it is mandatory for Turkcell to fulfill its obligations within the framework of the legal regulations to which it is subject.

- **If the personal data has been made public by you;**

The personal data made public by the Employee Candidate on all kinds of digital or physical media, including but not limited to job search and professional social media such as Kariyer.net, LinkedIn, may be processed in conformity with the purpose of publicization.

- **If personal data processing is mandatory for the establishment, exercise or protection of a right;**
- Personal data regarding the basic information of the Employee Candidate, including their CV, education, knowledge, work experience, and references, as well as the position applied for, evaluations of the application, and the application outcome, are processed. Additionally, information on whether the Employee Candidate has a relative previously employed in our company, a group company, or other operator companies is also processed.

These data are used for purposes such as conducting recruitment processes, evaluating applications, communicating with Employee Candidates, making job offers, and assessing positions, salaries, and benefits.

- **If personal data processing is mandatory for the legitimate interests of Turkcell, provided that it does not harm your fundamental rights and freedoms;**

The personal data outlined in the 'Personal Data of Employee Candidate' section of this Clarification Text is processed for purposes such as conducting recruitment processes, evaluating applications, communicating with Employee Candidates, administering tests and exams, conducting and assessing interviews, making job offers, evaluating positions, salaries, and benefits, carrying out HR activities, and controlling, auditing, analyzing, and improving HR processes.

III. Transfer of Personal Data

The personal data of the Employee Candidates may be shared with third parties in conformity with the legislation in order to achieve the above-mentioned purposes. In this context, the relevant personal data may be shared with Turkcell subsidiaries, both included and excluded the scope of this text, the survey and research companies, supplier companies with which co-operation is made for recruitment processes, the suppliers from which support is received in the fields of human resources, accounting and social security, and other business partners from which services are received for the realization of the purposes listed in this Clarification Text.

IV. Sensitive Personal Data and Purposes of Use Thereof

Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance, dress, membership in associations, foundations, or trade unions, health, sexual life, criminal convictions, security measures, as well as biometric and genetic data of Employee Candidates, are considered sensitive personal data under the Law on the Protection of Personal Data.

Following a positive recruitment outcome, information and documents such as health reports or criminal records, required due to the employment relationship, may be requested from the Employee Candidate during the employment process. Such sensitive personal data will be evaluated within the scope of the Turkcell Employee Clarification Text.

In exceptional cases, if sensitive personal data is collected during the recruitment process, it may be processed, stored, and, where necessary, shared with relevant parties, institutions, and organizations as required by legal regulations. This will be done in compliance with data

protection legislation and based on your explicit consent, where applicable, for legitimate purposes such as ensuring workplace health and safety, fulfilling service relationship requirements, and meeting the legal obligations of the relevant Turkcell group company under the Labor Law No. 4857, Occupational Health and Safety Law No. 6331, and other applicable legislation.

V. Your Rights Regarding the Protection of Personal Data

You are entitled to:

- learn whether your personal data is being processed,
- request information related thereto, if processed,
- learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- know the third parties to whom it is transferred domestically or abroad,
- request correction of personal data in case of incomplete or incorrect processing,
- request the deletion or destruction of your personal data within the framework of the conditions stipulated in Article 7 of the Law,
- request notification of the actions taken pursuant to your rights in form of correction, deletion and destruction as mentioned above to third parties to whom personal data have been transferred,
- object to the occurrence of a result against you due to analyze of your processed personal data exclusively with automated systems,
- demand compensation for your damage, in case you suffer damage due to unlawful processing of your personal data by applying to Turkcell pursuant to Article 11 of the Law.

In exercising the rights specified in Article 11 of the Law, Turkcell İletişim Hizmetleri A.Ş. and its group companies reserve the right to evaluate such requests within the scope of applicable legislation and respond accordingly, either positively or negatively.

VI. Communication

You may submit your requests regarding the implementation of the Law within the framework of Turkcell group companies' HR recruitment processes, as well as any questions concerning your personal data, to the HR Service Center in writing at the following email address: (IKHM-CC@globalbilgi.com.tr). To ensure a prompt and accurate response to your requests, it is recommended that the content of your request be clear, understandable, and, if possible, include a date.

Turkcell reserves the right to amend this Clarification Text at any time. Any amendments will take effect immediately upon the publication of the updated Clarification Text on <https://kariyerim.turkcell.com.tr>.

[1] (1) Kule Hizmet ve İşletmecilik A.Ş.; (2) Superonline İletişim Hiz. A.Ş.; (3) Turkcell Teknoloji Araştırma ve Geliştirme A.Ş., ; (4) Turkcell Satış A.Ş.; (5) Turkcell Finansman A.Ş.; (6) Turkcell Ödeme ve Elektronik Para

Hizmetleri A.Ş. ; (7) Turkcell Sigorta Aracılık Hizmetleri Anonim Şirketi ; (8) Lifecell İletişim Teknolojileri ve Dijital Servis A.Ş.; (9) Turkcell Enerji Çözümleri ve Elektrik Satış ve Ticaret A.Ş. ; (10) Lifecell Bulut Çözümleri A.Ş. ; (11) Lifecell Müzik ve Yayın İletişim A.Ş.; (12) Lifecell TV Yayın ve İçerik Hizmetleri A.Ş.; (13) Lifecell Dijital Servisler ve Çözümler A.Ş.; (14) Turkcell Dijital İş Servisleri A.Ş. 15) Turktell Bilişim Servisleri A.Ş..16) Turkcell Dijital Sigorta A.Ş. 17) Turkcell Gayrimenkul Hizmetleri A.Ş. 18) BİP İletişim Teknolojileri ve Dijital Servisler A.Ş. 19) Atmosware Teknoloji Eğitim Ve Danışmanlık A.Ş. 20) Boyut Grup Enerji Elektrik Üretim İnşaat Sanayi Ve Ticaret A.Ş 21) Ultia Teknoloji Yazılım Ve Uygulama Geliştirme Ticaret A.Ş. 22) Global Bilgi Pazarlama, Danışmanlık ve Çağrı Servisi Hizmetleri A.Ş.