

KOÇ UNIVERSITY

JOB CANDIDATE

**POLICY ON PRIVACY AND PROTECTION OF PERSONAL
DATA**

2019

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PURPOSE AND SCOPE OF POLICY

This Policy provides guidance on how to process personal data of Koç University (“University”) job candidates (academic & administrative staff) and also aims to give information to job candidates about the processing of their personal data.

This Policy covers the both Turkish and foreign academic and administrative staff of the University and shall be applied within the scope of their personal data.

A. Collecting and Processing Your Personal Data

1. Processing Personal Data of Job Candidates

In this section, regulations are set forth in regard to the processing personal data of job candidates during the recruitment process.

1.1. Personal Data Collected and Processes During Recruitment Process

The University may process the data stated under the section “VI. Categorization of Personal Data” of this policy, wholly or partly. The University may also collect and process the following information of administrative and academic job candidates:

- Full name, address, date of birth, e-mail address, phone number and other contact details,
- CV (for academic staff in the format provided by YÖK), resume, previous work experience and other experiences, educational background (including documents of YÖK or Inter-University Council (UAK) proving educational status), transcript, foreign language exam results or other supporting or explanatory documents related to job application,
- Records of data obtained during face-to-face, video conference or telephone interview,
- References from previous employers or information obtained while confirming the accuracy of the data transferred by the candidate or information obtained as a result of inquiries conducted by the University (personal data obtained from social media platforms such as LinkedIn in accordance with the particular sharing purpose and will of the relevant person),
- Results of the recruitment tests to assess skills and personality characteristics.

1.2. Purposes of Collecting and Processing Personal Data of Job Candidates

The University may process the personal data of job candidate on the basis of one or more of the following purposes and taking into account the nature of the application:

- To assess the qualification, experience and interest of the candidate with respect to the vacant position,
- To check the accuracy of the information submitted by the candidate or to contact third parties to conduct a reference inquiry about the candidate, if and when required,
- To contact the candidate with respect to the application and recruitment process,
- To meet the requirements provided in the YÖK regulations,
- To meet the requirements provided in other law and regulations,
- To meet the demands of the authorized bodies and organizations,
- To develop and improve the recruitment principles applied by the University.

1.3. Methods of Collecting and Processing Personal Data of Job Candidates

The personal data of candidates may be collected through the following means and methods as well as any other mean and method specified within this policy:

- Printed application form,
- CV's submitted to the University by the candidates via e-mail, mail, reference and other similar methods,
- Recruitment or consultancy companies and LinkedIn, Kariyer.net,
- By way of means such as video conference and telephone, or in case of face-to-face interview, during the interview,
- Reference checks,
- Recruitment tests to assess skills and personality characteristics, which are conducted and reviewed by experts with experience.

The University process the collected personal data by automatic or non-automatic means through IT systems and human resources staff.

1.4. Conducting Reference Inquiry Related to Candidate

The University may conduct reference inquiry about candidates. As a rule, this reference inquiry shall carry the purpose of confirming the accuracy of the information given by the candidate. In addition, it will also aim to reveal any information that the candidate has not disclosed and that may cause risks to the University.

Within the scope of reference inquiry, the require personal data such as identity details, work and educational experience may be shared with third parties; and also, personal data related to the candidates may be obtained from third parties.

No reference can be taken from the current workplace of the candidate without her/his knowledge.

The candidates may any time contact the University in regard to the reference inquiry conducted about themselves.

1.5. Rights of Job Candidates Regarding their Personal Data

Candidates who would like to use their rights under the Law numbered 6698 on the Protection of Personal Data ("KVKK") may apply to the University in accordance with the rules and procedures prescribed within this policy.

1.6. Personal Data Collected During Candidacy and Continued to be Processed in Case of Employment

All personal data collected and processed during the recruitment process shall be transferred to personal and/or assignment file of the candidate if and when s/he is decided to be employed.

1.7. Security of Personal Data of Candidates

When processing personal data, the University shall not differentiate among data subjects (job candidates). For further details on security of personal data, please refer to the section on the security of personal data under this document.

1.8. Retention Period of Personal Data of Candidates

The University retains the personal data of job candidates (administrative) for 2 (two) years. According to the YÖK regulations, the personal data of candidates applied for academic posts shall be retained indefinitely.

B. Security and Transfer of Your Personal Data and How to Exercise Your Rights over Personal Data

Pursuant to Article 12 of KVKK, all your personal data that was shared with us shall be kept confidential on the database of the University and shall not be disclosed to third parties.

The University shall take the following measures, as a minimum, to ensure security of the processed personal data, to prevent unlawful access and to prevent unlawful data processing:

- All pages where personal data is collected through the website are protected by SSL certificate.
- The University takes measures such as hashing, encrypting, log management timestamping, operation records, clearance and control matrix and physical security measures to enable protection of IT systems including personal data against unauthorized access and unlawful data processing.
- The network hosting website and all systems including personal data is protected by firewall.
- Our website uses cookies to offer a better browsing experience and to enable functional operability of the site.

The University keeps the personal data of both online and actual visitors by law and may disclose to the relevant public institutions and organizations upon request.

You are entitled to the following rights pursuant to Article 11 of the Law in regard to your personal data disclosed to us within the scope of the purposes and processing methods specified in this Policy on the Protection of Personal Data:

- a) To learn whether or not her/his data is being processed,
- b) To request information if her/his personal data has been processed,
- c) To learn the purpose of processing her/his personal data and whether or not the data is processed in compliance with such purpose,
- d) To find out the third-party recipients to whom the data is transferred within the country or abroad,
- e) In case her/his personal data is processed incomplete or incorrect, to request rectification of the same,

- f) To request erasure or destruction of her/his personal data under the conditions specified in Article 7 of the KVKK,
- g) To request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,
- h) To raise objections for the negative consequences occurring against her/his as a result of analysis of the processed personal data by solely automatic means,
- i) To demand compensation for the damages s/he has suffered as a result of an unlawful processing of the personal data.

You can submit your application to exercise the rights mentioned above by filling the “Application Form” found on our website (www.ku.edu.tr) and the methods indicated in that form.

C. Keeping of Your Personal Data Accurate and Current

Job candidates, whose personal data are processed, agree and acknowledge that it is essential to keep the personal data obtained through contractual relationship accurate and current to be able to exercise their rights on their personal data in accordance with KVKK and other relevant regulations, and that they will be fully and solely responsible for any consequences arising from misinformation. You can make changes and/or updates to your collected personal data by contacting kisiselverilerim@ku.edu.tr

D. Deletion, Destruction and Anonymization of Your Personal Data

Your personal data processed for the purposes set forth in this Personal Data Protection Policy shall be “anonymized” and remain in use when the initial purpose requiring the processing under Article 7(f)(i) of the Law no. 6698 is no longer valid and the respective legal periods as per Article 138 of the Turkish Penal Code expire.

Upon the end of the prescribed time period as specified in the relevant legislation or as required by the purpose of processing, the University shall use any one or more of the methods described in the Guidelines for the Deletion, Destruction and Anonymization of Personal Data published by the Personal Data Protection Board as it deems suitable for its business processes and operations to anonymize the personal data processed with respect to administrative job candidates, and continue to use the anonymized data in this manner. Personal data processed with respect to academic job candidates shall be retained indefinitely.

E. Categorization of Personal Data

Data Subject	Data Categories
Job Candidates (Administrative + Academic)	Identity Data, Contact Data, Professional Career Data, Educational Background, Visual and Audio Data
Job Candidates (Academic)	Data collected as part of assignment file

F. Amendments and Updates to the Policy

The University may amend or update this Policy pursuant to legal regulations and the University Policy on the Protection and Processing of Personal Data in order to comply with the amendments to be made in other policies, procedures and directives of the University and in accordance with law. The applicable Policy text reflecting the relevant amendments and updates shall be notified to respective persons by e-mail.