

PERSONAL DATA PROTECTION POLICY

Last updated: 25.09.2026

The purpose of this Personal Data Protection Policy (the "**Policy**") is to provide information on the personal data processing activities carried out by Göçük Law Firm ("**Göçük**") in accordance with Law No. 6698 on Protection of Personal Data ("**LPPD**"), the European Union General Data Protection Regulation ("**GDPR**") and other relevant legislation, and on the systems it has adopted for the protection of personal data. In this context, the aim is to inform the persons whose personal data is processed, primarily our clients and potential clients, business partners, employees and job applicants, suppliers, website visitors, newsletter subscribers and other third parties who contact Göçük. For detailed information on specific processing activities, the **Privacy Notice**, for cookies the **Cookie Policy**, and for cases requiring explicit consent the **Explicit Consent Statement** shall be relied upon; in the event of a conflict with these documents, the specific documents shall prevail.

Determination of data controller / data processor capacity: Göçük acts as the **data controller** with respect to website visitors, potential clients, suppliers, employees and job applicants, as it determines the purposes and means of processing itself. With respect to case/enforcement/dispute file data that it processes within the scope of the legal services it provides to its clients (including data belonging to the opposing party, witnesses, experts and third parties), however, it mostly acts **on the client's instructions and for the establishment, exercise or protection of a right**; the obligation to inform data subjects regarding these activities is, as a rule, fulfilled by the relevant client.

1. Legal Basis for Processing Personal Data

Göçük processes personal data only where (i) it is expressly provided for by law, (ii) it is necessary for the protection of the life or physical integrity of the data subject or of another person who is unable to give consent due to actual impossibility or whose consent is not legally valid, (iii) processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of that contract, (iv) it is necessary for Göçük to fulfil its legal obligations, (v) the data has been made public by the data subject, (vi) it is necessary for the establishment, exercise or protection of a right, (vii) it is necessary for Göçük's legitimate interests, provided that this does not harm the fundamental rights and freedoms of the data subject, or (viii) the data subject has given explicit consent (LPPD Article 5).

Data relating to persons' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, constitute special categories of personal data. The processing and transfer of special categories of personal data is possible in the presence of the additional conditions set out in LPPD Article 6/3 (expressly provided for by law, made public, necessary for the establishment/exercise/protection of a right, etc.) or with the explicit consent of the data subject.

Special categories of personal data other than data relating to health and sexual life may be processed without the explicit consent of the data subject in cases stipulated by law. Personal data relating to health and sexual life, however, may be processed without the explicit consent of the data subject only for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, or by **persons under an obligation of confidentiality**. Since attorneys are bound to keep professional secrecy under Article 36 of the Attorneyship Law No. 1136, Göçük may benefit from this exception to the extent necessary within the scope of the file; however, the exercise of data subject rights shall be fulfilled to the extent that it does not violate the legitimate interests of third parties (the opposing party, file subjects, etc.) or professional secrecy.

2. Purposes and Methods of Processing Personal Data

Göçük obtains personal data falling within the categories of *identity, contact, legal transaction, customer transaction, physical premises security, professional experience, visual/audio recording, transaction security and special categories of data* through methods such as electronic mail, website, telephone, post, courier and hand delivery, and undertakes to process personal data in accordance with the principles on the protection of personal data and the following purposes:

- **Our clients' and potential clients'** personal data is processed for the purposes of performing all kinds of legal representation and legal advisory activities, conducting communication activities, managing client relations, conducting pre-contractual negotiation and offer processes, managing reporting and finance/accounting processes, fulfilling legal obligations and ensuring information/physical premises security.

- **Our employees' and job applicants'** personal data is processed within the framework of human resources policies, for the purposes of performance of the employment contract, occupational health and safety, fulfilment of obligations under social security and tax legislation, personnel file activities, performance evaluation and conduct of recruitment processes.
- **Our suppliers' and cooperating institutions' employees and officials, and third parties'** personal data is processed for the purposes of conducting operational and commercial activities, fulfilling obligations arising from contractual relationships and conducting tax/declaration processes.
- **Our website visitors'** personal data is processed for the purposes of maintaining the basic functions of the site, facilitating navigation, improving its performance and optimising our services.
- **E-newsletter and legal development announcement subscribers'** personal data is processed on the basis of explicit consent for the purpose of providing information about current legal developments and event announcements.

For an illustrative breakdown of the categories of data processed:

Data Category	Example Data
Identity	Full name, Turkish ID number, date of birth
Contact	Telephone, e-mail, address
Legal Transaction	Request/complaint information, pre-contractual negotiation records
Customer Transaction	Invoice/payment information
Professional Experience	CV, reference information (job applicants)
Physical Premises Security	Camera recording (if any)

Visual/Audio Recording	Event/seminar photographs (with explicit consent)
Transaction Security	IP address, cookie ID, log records
Special Categories of Data	Health, criminal conviction, trade union membership, etc. (only where shared by the data subject of their own volition within the scope of the relevant legal service)

3. Transfer of Personal Data Within Türkiye

Where any of the lawfulness grounds specified in Article 1 of this Policy exists, personal data is transferred without the need for explicit consent; otherwise, no transfer is made without the explicit consent of the data subject.

Where the legal grounds set out in Article 1 exist and in line with the purposes set out in Article 2, Göçük transfers personal data to service providers and suppliers established in Türkiye, independent audit/financial advisory firms, banks, law enforcement authorities, courts, enforcement offices, notaries, relevant professional chambers, tax offices and other attorneys/law firms.

4. Transfer of Personal Data Abroad

4.1. Transfer Abroad under the LPPD

Göçük may process personal data abroad and transfer it abroad where the data subjects have given their explicit consent. However, where any of the lawfulness grounds specified in Article 1 of this Policy exists and in the foreign country to which the personal data will be transferred (i) adequate protection exists, as determined and announced by the Personal Data Protection Board ("**Board**"), or (ii) where adequate protection does not exist, the data controllers in Türkiye and in the relevant foreign country undertake adequate protection in writing (by means of the **standard contract** prescribed by the Board) and the Board's permission has been obtained or the Authority has been notified, the transfer abroad may be made without seeking the consent of the data subject (LPPD Article 9 and the Regulation dated 10.07.2024).

Based on the principles set out above, Göçük may transfer the personal data it obtains to the cloud/e-mail service providers it uses that are established abroad, to clients and/or business partners established abroad, and to competent public institutions and organisations.

4.2. Transfer under the GDPR

Göçük may transfer the personal data it obtains to countries outside the European Economic Area ("EEA"). As a rule, in order for personal data to be transferred to countries outside the EEA, the country of transfer must have been declared by the European Commission to be a safe country providing an adequate level of protection. If the recipient is not among the countries providing adequate protection, Göçük may carry out the data transfer on the basis of (i) binding corporate rules, or (ii) **standard contractual clauses (SCC)** published or approved by the European Commission.

If none of the above conditions can be met, the transfer may only be carried out in exceptional cases such as the explicit consent of the data subject, the data subject entering into a contractual relationship that requires transfer abroad, the conclusion/performance of a contract in the interest of the data subject, public interest, the establishment/exercise/defence of legal claims, or the protection of vital interests.

5. Measures Regarding the Retention, Security and Protection of Personal Data

In order to prevent the unlawful processing of personal data, prevent unlawful access to personal data and ensure that personal data is retained in accordance with the law, Göçük takes all necessary technical and administrative measures to ensure an appropriate level of security. In this context, the following measures, which are listed by way of example and without limitation, are applied:

- Processes and procedures for the processing of personal data are defined and periodically reviewed,
- Regular briefings and training sessions are organised to raise employees' awareness of the protection of personal data,
- Confidentiality undertakings are signed with suppliers involved in personal data processing and transfer processes,

- Physical files and documents are kept in locked environments closed to unauthorised access in order to ensure confidentiality,
- Personal data is stored separately, retention periods are systematically monitored, and destruction processes are carried out for data whose retention period has expired,
- Regular system checks are carried out for information and infrastructure security, and information systems are updated by monitoring technological developments.

In the event of any data breach, Göçük shall in accordance with the legislation and pursuant to the LPPD and the GDPR, notify the relevant institutions and organisations and the data subjects within a reasonable time and in cases falling within the scope of the GDPR, no later than **72 hours**.

6. Rights of Data Subjects

Data subjects may exercise the following rights regarding their personal data under LPPD Article 11 by applying to Göçük:

- To learn whether their personal data is processed,
- To request information if their personal data has been processed,
- To learn the purpose of processing of their personal data and whether it is used in accordance with that purpose,
- To learn the third parties to whom personal data is transferred, within Türkiye or abroad,
- To request rectification of personal data if it has been processed incompletely or inaccurately,
- To request the deletion or destruction of personal data within the framework of LPPD Article 7,
- To request that the rectification, deletion and destruction operations be notified to third parties to whom personal data has been transferred,
- To object to the occurrence of a result against the person themselves by means of the analysis of the processed personal data exclusively through automated systems,

- To request compensation for damages in the event of suffering harm due to the unlawful processing of personal data.

Data subjects falling within the scope of the GDPR additionally have the following rights:

- To obtain information about personal data processing activities,
- To access their processed personal data and the processing activity,
- To request the rectification of their personal data,
- To request the erasure of their personal data ("right to be forgotten"),
- To request the restriction of personal data processing activities,
- To request that rectification, erasure or restriction operations be notified to the third parties to whom data has been transferred,
- To request the transfer of their personal data to another data controller,
- To object,
- Not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

In order to exercise the rights specified above, data subjects may submit their requests, or the completed **Data Subject Application Form**, together with information enabling their identity to be verified, through one of the channels specified in Article 9 of the Privacy Notice to Göçük. Applications are concluded as soon as possible depending on their nature and within **30 days** at the latest. In the event that the application is rejected, found insufficient or not answered in time, the right to lodge a complaint with the Personal Data Protection Board is reserved.

7. Amendments to the Personal Data Protection Policy

Göçük may make any changes it deems necessary to this Policy when data processing procedures or legislative provisions change. Such changes shall take effect upon publication of the updated Policy text on the gocuk.com.tr website.

Contact: For any questions regarding this Policy, you may reach us at bilgi@gocuk.com.tr / 0 (232) 484 48 46.