**Student and Parent Disclosure Statement**

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# HISAR SCHOOLS STUDENT AND PARENT DISCLOSURE STATEMENT

Hisar Eğitim Vakfı İktisadi İşletmesi (“Hisar Schools”) exercises utmost sensitivity regarding the security of your personal data. Driven by this awareness, we attach great importance to the protection of any type of personal data belonging to persons associated with the Hisar Schools, including persons using our services, by processing said data in accordance with Law no. 6698 on the Protection of Personal Data (“KVKK Law”). With full understanding of this responsibility, Hisar Schools process your personal data as explained below, within the limitations stipulated by regulations, in the capacity of “Data Controller”, as defined in KVKK Law.

## Processing Personal Data and Sensitive Personal Data Associated with the Students and Parents

At Hisar Schools, we process the following personal data and sensitive personal data associated with the students and parents.

Personal Data:

* Identity Information: RoT ID No, full name, nickname, place / date of birth, signature, (if applicable) passport number, (if applicable) athlete license number
* Personnel Information: Gender, guardianship information, citizenship information
* Contact Information: Phone number, E-mail address
* Location Information: Address information
* Professional Experience: Title, professional experience
* Financial Information: Compensation information, movables and immovables information, bank account information, alimony information, tax number, information on the previous financial aid to the student
* Audiovisual Information: Photograph, camera recordings, videos, and photos from the events / projects that take place at the school
* Legal transactions: guardianship certificate
* Other: Examination and report card grades; all kinds of opinions on the student as delivered by the teachers, school counselors, counselor at the university and parent opinions; minutes of PTA meetings

Sensitive Personal Data:

* Medical Information: Disease and allergy information, Physical growth information, Healthcare information
* Biometric and Genetic Data: Blood type

## Personal Data Collection and Processing, Purposes of Processing

The student and parent data shall be processed within the scope of Articles 5 and 6 of KVKK (Law on the Protection of Personal Data) so as to ensure that Hisar Schools perform its operations in accordance with the relevant legislations and procedures for the following purposes.

The data collection purposes as part of the enrollment process:

* Commencing and conducting the enrollment process, arranging the files associated with the documentation required for the enrollment process
* Using the relevant person in various academic processes, if needed by the School, throughout their education at Hisar Schools
* Evaluating the students’ scholarship and financial aid requests based on their success at school and financial status

The data collection purposes as part of the infirmary processes:

* Approval of the rest and sick leave reports obtained from different healthcare institutions by Hisar Schools in the scope of Law No. 5510 on Security And Universal Health Insurance, notifying SSI accordingly, and recording such reports
* Performing the first medical examination at the school’s infirmary following the enrollment, as well as periodic health checks throughout the student’s education, and creating medical files
* Sharing the student’s medical information with the relevant departments at Hisar Schools if deemed necessary as part of the personal medical file records

The data collection purposes as part of the counseling processes:

* Evaluating the personal, academic and psychological situation of the students, and reinforcing their development
* Following up the situation by recording the observations of the relevant people such as teachers and counselors, as well as the assessments on the students
* Recording the important matters discussed with parents regarding the students at PTA meetings in order to take actions in favour of the students, where necessary
* Exchange of information, where necessary, with the external experts / therapists the students get help from
* Making the information and documentation for audits to be conducted by MEB (The Ministry of National Education) available by creating and keeping records of the Disciplinary Board Processes
* Determining the students to participate in the Inclusion Program conducted by the Ministry of National Education as part of the Individualized Education Program (IEP) according to the procedures of the Ministry of National Education Regulation on the Special Education and Guidance Services
* Reinforcing the students’ orientation and adaptation to school through the activities co-organized by the Hight School counseling department and senior students for the newcomers as part of the Peer Support Program
* Managing the high school students’ educational assessment processes in line with the Ministry of National Education Regulation on the Special Education and Guidance Services and sharing the assessment results with the Ministry of Education within the framework of the Counseling Research Center (CRC) application processes of high school students

Data collection purposes as part of the processes conducted by the Registrar’s Office:

* Recording, managing and, where required, sharing with the relevant parties the necessary information to manage the internal processes associated with the student
* Keeping a track of the graduating high school students and submission of the diploma to the students in question
* Following up the high school students’ success in passing the courses annually, and recording the results on the Pass-Fail Record Book for availability of information during audits to be conducted by MEB

The data collection purposes as part of the general educational processes:

* Monitoring the student’s academic and social development
* Reinforcing the student’s academic and social development
* Assessing the student’s academic achievement

Data collection purposes as part of the clubs and events, community services, international projects and AP coordination processes:

* Preparation of the documentation required by the relevant federation for students who want to participate in the tournaments
* Duly preparing the student yearbook content
* Providing transportation services for school trips when the school busses are to be the means of transport
* Observing the student activities and recording teachers’ opinions during the club events in order to duly respond to any unwanted behaviors observed and making the club’s files available for potential public audits
* Recording the community service projects,
* Sharing the videos and photos from the community service events on social media accounts created for such purposes; sharing those videos and photos with the institutions that host the events; developing students’ creativity by making short films on the projects through use of videos and photos; working on documentaries with audiovisual recordings related to the project and posting them on social media accounts
* Facilitating communication between the students and the organizations to hold the conference, while handling domestic and overseas conference registration process
* Sharing videos and photos from local and overseas conferences and on social media, e-bulletins and the school’s website

Data collection purposes as part of the Hisar Academy Culture & Arts Center, and Hisar Sports Club processes

* Recording and evaluating the applications to the Hisar Academy programs and sending invitations for the events
* Recording the agreements signed with the student athletes and parents
* Recording the license certificates of student athletes

The data collection purposes as part of the library processes:

* Keeping the track of the books temporarily allocated for the students at the school library in order to avoid any delays and losses associated with the delivery of books
* Keeping a record of the books owned by the school’s library
* Keeping a statistical record of the books on the basis of such categories as theme, author, target audience etc.

The data collection purposes as part of the university counseling processes:

* Arranging trial examinations to prepare the students for the national university exams, and monitoring their success accordingly
* Facilitating and reinforcing the preparation and examination process for students who apply for undergraduate studies abroad

The data collection purposes as part of the accounting and financial processes:

* Planning, following up and recording the payments and relevant financing procedures

Data collection purposes as part of security procedures for access to and circulation within the facilities and Internet access

* Ensuring safety through surveillance cameras and by keeping a record of Internet access
* Enhancing service quality
* Fulfillment of legal obligations Hisar Schools is subject to as per Law no. 5651 on the Regulation of Publications on the Internet

The data collection purposes as part of Corporate Communication:

* Sending monthly e-bulletins on the academic and social activities, as well as sports and arts efforts of Hisar Schools and student projects
* Announcing the activities at Hisar Schools via e-mail

We additionally record and retain the contact information of our alumni in order to maintain the corporate legacy of Hisar Schools and ensure the active continuity of the activities of our Alumni Association by staying in contact with our alumni

## Parties with whom Processed Personal Data is Shared and Purposes Thereof

Your personal data collected can be shared with the parents, students and alumni, shareholders of Hisar Schools, Hisar School officials, business partners, persons or third parties that provide services, as well as the competent public authorities and natural persons, particularly including the Ministry of National Education, under the framework of the terms and purposes related to processing personal data, as described in articles 8 and 9 of the Law on the Protection of Personal Data in order to ensure that our departments perform the necessary operational activities, establish safety at school, executed the enrollment and the other relevant procedures and ensure the fulfillment thereof in line with the legislation and Corporate procedures. To this end, Hisar Schools share data as follows:

* Sharing identity data with the organizations and institutions that arrange events for participation in such activities as conferences, tournaments, school trips etc.
* Sharing location and contact details with the school’s contracted service firms in order to facilitate transportation to school or the events led by the school itself
* Sharing photos with the publishing houses during the preparation of school’s yearbook
* Sharing visual records to feature the school events on social media accounts and the website of Hisar Schools
* Sharing medical data with the food engineer assigned at the school and cafeteria to observe the student healthcare
* Exchange of information with the student’s therapist, if any, in special cases, where it is deemed necessary, in order to follow up and reinforce the psychological development of the student
* Sharing data with the intermediary systems and platforms that host applications for the universities abroad, and with the universities
* Sharing data with the publications that help leverage the trial exams during the preparation for national university examination
* Data transfer required due to the nature of conclusion of an agreement with the contracted banks during the payment of tuition fees

## Method and Legal Justification for Collection of Personal Data

Although the procedures may vary depending on the nature of your relationship with Hisar Schools, your personal data can be collected verbally, in writing or electronically in an automatic or non-automatic manner via the Hisar Schools departments and offices, websites, social media accounts, as well as mobile apps and other means. Your personal data collected in the aforementioned manner may be processed and shared also for the purposes specified in article 2 and 3 herein within the scope of the terms and purposes applicable to processing personal data, as specified in articles 5 and 6 of KVKK. Moreover, your personal data might be processed when you use our website, visit Hisar Schools or the website thereof, participate in the training courses, seminars or organizations arranged by Hisar Schools.

Regarding the personal data it processes during the execution of its operational processes associated with the students, Hisar Schools observe the Hisar Schools Policy on Processing and Protecting Personal Data; Regulation on Preschool Education and Primary Education Institutions of the Ministry of National Education; Regulation on Private Educational Institutions of the Ministry of National Education; Regulation on Private Education and Counseling Services of the Ministry of National Education; Law no. 5651 on Regulation of Publications on the Internet; Law no. 5510 on Social Insurances and General Health Insurance.

Hisar Schools retain your personal data solely as described in the relevant legislation and / or internal policies or throughout the period required for purposes of processing. In this regard, first of all, the period stipulated in the legislation for personal data retention is observed. In the event of failure to foresee such period, personal data is retained for the period of time deemed necessary for data processing purposes in accordance with the directives in internal policies. In the event of termination or if the justification for processing ceases, personal data is removed, destroyed or anonymized.

## Your Rights As the Data Subject, As Specified in Article 11 of KVKK

As the personal data subjects, if you send a request regarding your rights to Hisar Schools via the below-mentioned methods, as governed herein, we will handle such request as soon as possible and free of charge within thirty days at the latest. However, if such handling requires an additional cost, Hisar Schools will charge the fee in the tariff determined by the Personal Data Protection Board. In this scope, data subjects are entitled to:

* Receive information on whether personal data has been processed or not,
* Request information on the subject in the event that data has been processed,
* Find out the purpose of processing such personal data and whether it has been used in line the intended purpose,
* Be informed about third parties to whom the personal data has been transferred domestically or abroad,
* Request correction of personal data in case of incomplete or incorrect processing and that the transaction made within this scope be notified to third parties where personal data is transferred,
* Request deletion or destruction of personal data, although it has been processed in accordance with KVKK and other relevant provisions of the law, in case the reasons that require processing of data no longer exist; and request that any transaction made in this scope be notified to the third parties to whom personal data is transmitted;
* to object to any condition that arise against subjects where processed data is exclusively analyzed by automatic systems;
* to claim indemnification in case of loss occasioned by a treatment of his/her personal data revealed to be contrary to the Law.

Any applications associated with these rights must be submitted to Hisar Schools by completing the application form on the website of Hisar Schools in writing or via a registered electronic mail (KEP) address, or mobile signature, or by using your e-mail address on file with us, based on your previous notifications. Additional confirmation procedures might be required by Hisar Schools in order to determine whether the application actually belongs to you and, accordingly, protect your rights (e.g. by sending SMS or contact via phone). In the event that the application is made by a third party on behalf of the personal data subjects, the third party must hold a notary-certified special power attorney as granted by the data subject.

You may send your request regarding your rights that you wish to exercise, from among the rights specified in article 11 of KVKK, alongside the necessary information that facilitates your identification, to enjoy your rights mentioned above, you can complete the below form and submit a signed copy thereof to the following address, alongside the documentation that facilitates your identification personally or via notary or the other methods specified in KVKK: Göktürk Merkez Mahallesi İstanbul Caddesi No:3 Eyüpsultan/Istanbul. Or you may submit the relevant form to info@hisarschool.k12.tr with electronic signature securely.

If you do not receive any response to your application within 30 calendar days, as set forth by law, or in case of rejection of your application, and if you believe that such response is insufficient, you may raise a complaint to the Personal Data Protection Council within 30 days following the response from Hisar Schools and, under any circumstances, within 60 calendar days following the date of application.