

Hisar School General Data Protection Committee Guidelines

Purpose of the Guidelines and Scope

Item 1: The purpose of these guidelines is

To form the Hisar School Personal Data Protection Committee and determine its conduct.

Item 2: Definitions

- A. Law 6698: refers to the General Data Protection Law issued in the Official Gazette dated 24.03.2016,
- B. Data Officer: refers to the individual or legal entity who determines the purpose and means of processing personal data and is responsible for recording and managing data,
- C. Making The Data Public: refers to processing of the personal data, which, under no circumstances, should be associated with a specific individual even by matching it with other data.

Purpose, Formation and Structure of the Committee

Item 3: Purpose of the Committee

To carry out work in the following areas and to provide guidance and assistance to the General Manager and the Executive Committee.

- A. To ensure that the data privacy is well understood within the institution, to increase awareness and to determine the risks involved,
- B. To define and keep data privacy policies and standards up-to-date,
- C. To prepare policies, processes and procedures and keep them up-to-date,
- D. To affect the assessment linked to the possible risks within the scope of projects,
- E. To take action toward specified precautions and to design inspection tools regarding the processes,
- F. To ensure security checks related with newly-adopted systems are in place,
- G. To follow up on activities and actions concerning security and ensuring that security mechanisms established are actively in operation,
- H. To record and report any incidents corresponding to the disclosure of personal data,
- I. To define, follow up and report on the applications, complaints and personal records of the data officers,
- J. To analyze the lessons learned from the outcome of the events that take place within the scope of personal data protection and organize trainings accordingly.

Item 4: Forming the Committee

- A. Committee members and the Committee Chair are assigned by the General Manager for 3 years of service from among the following departments.
 - a. Internally
 - i. IT Department
 - ii. MoE and/or Student Affairs
 - iii. Human Resources
 - iv. Vice Principal
 - b. Externally
 - i. Legal Advisors
- B. The Committee meets at least biannually and submits a report to the General Manager and the Executive Committee regularly.
- C. The chair's duties and responsibilities include, but are not limited to, the following;
The Chair shall:
 - a. Ensure that the Committee functions properly, that all issues are discussed and effective decisions are made and carried out.
 - b. Provide leadership & ensure committee members are aware of their obligations and that the committee complies with its responsibilities.
 - c. Recognize conflict and disagreement in this topic and use problem-solving skills to deal with them.
 - d. Inform the General Manager and The Executive Committee about the committee issues and actions.
 - e. Provide effective communication and coordination with the General Manager and the Executive Committee.
 - f. Officiate and conduct meetings. Ensure meeting are called and held in accordance with the School's mandate, terms of reference or by-laws.
 - g. Ensure that the conduct of the meetings is productive and professional.
 - h. Manage the crisis situations efficiently.

Item 5: Methods and Procedures

- A. Duties and responsibilities of the Committee are indicated in the chart below in Annex 1.
- B. Responsibilities associated with the processes and life cycle are shown in the chart given in Annex 2.

Item 6: Elucidation and Decision

- A. The Committee carries out the duties indicated in Annexes 1 and 2 and informs the General Manager and the Executive Committee of the outcome.
- B. In the event that a decision has to be made and an action to be taken about the personal data protection, proposals created by the Committee are submitted to the General Manager and the Executive Committee for decision-making.

- C. During its work the Committee benefits from the documentation below and, when necessary, revises these documents before submitting them to the Executive Committee.
 - a. Elucidation letter,
 - b. Personal Data Processing Inventory and Data Classification Proposal,
 - c. Processing and Protection of Data Policies,
 - d. Data Retention and Destruction Policy,
 - e. Complaint Application and Infringement Management Proposal,
 - f. Personal Right Infringement Notification Form,
 - g. Personal Data Disposal Form,
 - h. Contact Application Form
- D. The General Manager monthly informs the Founder's Representative about decisions and applications

Enforcement and Execution

Item 7: These guidelines go in effect upon approval by the Board of Directors of Hisar Education Foundation.

Item 8: Provisions stated in these guidelines are enforced by the General Manager. The General Manager is responsible against the Founder's Representative in all provisions.