

# Turkish Airlines

## Protection of Personal Data

### Announcement for UM Passengers

#### Introduction

Türk Hava Yolları Anonim Ortaklığı (hereinafter referred to as “THY”, “Company” or “We”), pays the utmost attention to the lawfulness of the processing of personal data of its customers. The *Turkish Airlines Protection of Personal Data Announcement for UM Passengers* (“Announcement”) herein have been prepared in accordance with the Article 10 of Law on Protection of Personal Data numbered 6698 (“Law”) and EU General Data Protection Regulation (“GDPR”) to ensure that the personal data of our unaccompanied minor (“UM”) passengers and their esteemed legal representatives that are buying tickets, making reservations or during similar operations at our ticket sale offices, check-in counters at airports or our agencies are processed under their full control and in a transparent manner.

In this respect, within this Announcement we provide you information on, as a data controller, which personal data of yours we process and for what purposes, the third parties we share your data with, your rights and methods that you may contact us.

For more detailed information about the processing of your personal data, you may read the *Türk Hava Yolları Anonim Ortaklığı Privacy Notice on the Processing and Protection of Personal Data* published on <https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html>. For more detailed information about GDPR you may read the GDPR Privacy Notice published on <https://www.turkishairlines.com/en-tr/legal-notice/gdpr-privacy-notice>.

#### How Do We Collect Your Personal Data?

Your personal data can be collected while you are buying tickets, making reservations or during similar operations at our ticket sale offices, check-in counters at airports or our agencies via printed documents and/or through electronic systems. As per the Law, your personal data may only be processed where one or more conditions that are stipulated under Law are present. As THY, regardless of the purpose for which we process your personal data, we process it in accordance with the provisions of national and international law, primarily the general principles stated under Article 4 of the Law and by relying on conditions for lawful data processing listed under Article 5 and 6 of the Law.

#### Which Personal Data We Process?

General information on your personal data processed by THY are as follows (For more detailed information about the type of personal data processed, you may read the *Türk Hava Yolları Anonim Ortaklığı Privacy Notice on the Processing and Protection of Personal Data* published on <https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html> :

- **Identity and Contact Information:** Personal data such as name, surname, identification number, passport information and contact information such as e-mail address, phone and cell phone number or social media contact information that you

have provided to us while creating accounts, making plane ticket reservations or applying for exclusive services offered by THY and its partners.

- **Flight Information:** Reservation or ticket information or other information related to your flights,
- **Advance Passenger Information ("API"):** Personal data relating to your name, nationality, birth date, gender, type and number of your travel documents and its date of validity, and its issuing country.
- **Evaluations and requests:** Information regarding your assessments, complaints and requests relating to our services.
- **Payment Information:** Credit/Debit card information, bank account information, IBAN information, balance and receivable information and other financial data,
- **Membership Program Information:** If you are a member, information regarding Miles&Smiles ve Turkish Airlines Corporate Club membership programs.
- **Disease, Allergy, Special Dietary Requirements Information:** Upon your request and consent, we may process UM Passengers disease, allergy information and special dietary requirements, in order to provide the service that the UM Passenger needs during the travel.
- **Cabin Tablets Photo Records:** In case related services requested from THY, images of flight experience recorded through Cabin Tablets may be processed.

## Why Do We Process Your Personal Data?

THY will process your personal data for the following purposes. (For more detailed information about the purposes of processing of your personal data, you may read the *Türk Hava Yolları Anonim Ortaklığı Privacy Notice on the Processing and Protection of Personal Data* published on <https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html>.

- **Management of flight reservations and other related services:** Performing operational transactions such as flight booking, issuing flight tickets, check-in transaction regarding baggage and cargo transportation, flight card preparation, boarding and other services related to your flight.
- **Communication:** Informing our customers regarding our regular operations such as establishing communication with you via SMS, e-mail or telephone for the purposes of conveying booking information, confirmation regarding the purchase of your ticket or to provide payment and flight details. (Please be noted that the electronic messages transmitted for the purposes stated above, or for other similar service information and excluding messages transmitted for marketing purposes shall not require the consent of the recipient as per the Article 6 of the *Regulation on Commercial Communication and Commercial Electronic Messages* and may be transmitted to you by THY without obtaining your consent.)
- **Evaluations of Request and Opinions:** Receiving opinion, complaint and evaluations of our customers on our services through written/online form and surveys and evaluating them,
- **Legal Obligations:** Ensuring compliance with the national and international legislation to which THY is subjected to and fulfilling the obligations arising from the relevant legislation,

- **Service Customization:** Offering, proposing and introducing the programs, services and products to the related persons and performing the activities for the customization of them according to the usage habits and needs of the related persons,
- **Membership Programs:** In case you are a member of our membership programmes, in particular to Miles&Smiles, Turkish Airlines Corporate Club, carrying out the necessary work to take advantage of related loyalty program services and carrying out the relevant business processes.
- **Services to Improve Travel Experience:** Providing services in order to improve travel experience and increase passenger satisfaction such as Cabin Tablets Application (which provides personalized souvenir photos during journeys) and in-flight entertainment system (“IFE”).

## To Whom We Transfer Your Personal Data and Why?

Under certain circumstances, we may transfer your personal data that we process to third parties residing within borders or abroad, in accordance with the provisions of national and international law, particularly Article 8 and 9 of the Law.

Third parties that we may transfer your data can be listed categorically as follows:

- **Our business partners or suppliers residing within borders or abroad;** e.g., Security firms, ground operation service providers at airports, transportation service providers, global distribution systems, partner airlines that will provide you services during connecting flights,
- **Group companies,** e.g. certain services offered by THY are carried out by our affiliates, within this context, your personal data may be shared with our relevant affiliates. You may find more detailed information regarding our group companies on [Türk Hava Yolları Anonim Ortaklığı Privacy Notice on Protection and Processing of Personal Data](https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html) <https://www.turkishairlines.com/en-tr/legal-notice/privacy-policy/index.html> or from the following link: <https://www.turkishairlines.com/en-us/press-room/about-us/index.html>
- **Suppliers;** e.g. software companies that we procure technical services, security firms, transportation service providers.
- **Foreign countries that the transportation is carried out to and private and public institutions authorized by national or international legislations;** e.g. to enforcement agencies, executive or judicial bodies in relation to ongoing investigations or when travelling to United States of America, to United States National Security Council etc.

## What are Your Rights as Data Subjects?

As data subjects, you are entitled to a number of rights under Article 11 of the Law in relation to your personal data. We would like to inform you about the rights that you are entitled to and the ways you may use them.

The rights you have under the Article 11 of the Law are as follows:



Learn whether data relating you are being processed,



Request further information if personal data relating to you have been processed,



Learn the purpose for the processing of personal data and whether data are being processed in compliance with such purpose,



Learn the third-party recipients to whom the data are disclosed within the country or abroad,



Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred,



Request deletion or destruction of personal data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law and other applicable laws and request such process to be notified to third persons to whom personal data is transferred,



Object to negative consequences that you experienced as a result of analysis of the processed personal data by solely automatic means,



If you are subject to GDPR, please visit <https://www.turkishairlines.com/en-pl/legal-notice/gdpr-privacy-notice/> for more information about your rights.

You can easily use your rights mentioned above and easily communicate the related requests to us via contact information below. Data subjects' requests concerning the above-listed rights shall be concluded by us within thirty days at the latest, in accordance with the limitations provided by the Law. In principle, data subject requests shall be concluded free of charge. However, Turkish Airlines reserves its right to demand a fee from the tariff specified by the Board, in case the request requires additional costs. Our Company may request certain information from the data subject in order to determine that the applicant is in fact the Data Subject, and additional questions can be directed to the applicant to clarify matters regarding the applications.

#### THY HQ ENTITY

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If you live in Germany and have an unresolved concern you can also contact our German DPO:



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