

**EMAAR GROUP HUMAN RESOURCES' PROCEDURE ON PROTECTION OF  
PERSONAL DATA**

**1. Objective**

**The objective of this procedure is to ensure that processes related to recruitment, training, job orientations, career and talent management, performance management, follow-up of personnel affairs and organizational development conducted within the body of Emaar Group Human Resources Department are compliant with 6698 numbered Code on Protection of Personal Data (“CPPD”) and Emaar Group's Policy on Protection of Personal Data.**

**2. Scope of the Procedure**

**This procedure covers the issues on following activities carried out within the body of Emaar Group Human Resources Department;**

- i. recruitment processes,**
- ii. employees' trainings and orientation,**
- iii. career and talent management of employees,**
- iv. performance management of employees,**
- v. follow-up of personnel affairs,**
- vi. processing all kinds of personal data concerning insurance and bank procedures of employees, and**
- vii. organizational development of the institution.**

**3. Purpose of Processing Personal Data**

**Emaar Group Human Resources Department commits processing personal data of employees of Emaar Group complying with following purposes and pursuant to the principles specified within the frame of 4th article of CPPD:**

- i. Performance of recruitment processes,**

- ii. **Utilizing rights and fulfilling liabilities arising from labour, social security, tax etc. legislations,**
- iii. **Taking out private health insurance policy and conducting procedures required within this scope,**
- iv. **Including personal data onto website with the purpose of informing,**
- v. **Settlement of disputes arising from labour law,**
- vi. **Making institutional planning,**
- vii. **Providing order, control, security, management and harmony in workplace and collecting finger print, identity information and photo etc. data within this scope,**
- viii. **Achieving camera, video record and photo etc. data acquired from office activities.**

#### **4. Personal Data Protection in Recruitment Process**

**Personal data requested by Emaar Group Human Resources Department from candidates in recruitment process** are evaluated within the scope of CPPD and provisions of related legislation.

Following data cannot be requested without obtaining explicit consent of related candidate during recruitment procedures:

- i. Identity card, driver's license, passport, residency certificate, birth certificate, certificate of military service, head shot etc. documents and/or printed copies of those;
- ii. Various information on penal conviction and security measures, including criminal record;
- iii. all kinds of contact information such as address, telephone, e-mail etc.
- iv. Photograph, video, finger print etc. biometric and genetic data;

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- v. all kinds of information and documents included in resume of Data Owner such as diploma, foreign language knowledge, foreign language examination result certificate, academic record, certificates on occupational competence and membership of associations and/or printed or digital copies of these;
- vi. blood type and medicines regularly used, if any, and health reports;
- vii. Photograph and video records shot during presentations, trainings, conferences and other activities or for security purposes; and
- viii. race, ethnic origin, political opinion, philosophical belief, religion, communion or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal convictions and security measures etc. data and Special Quality Personal Data such as biometric and genetics.

## 5. Data Collection Methods

**Emaar Group Human resources department may collect personal data by means of oral communication, e-mail, website, fax, telephone, mail, courier, hand delivery etc. methods.**

## 6. Permission for Processing and Transfer

Processing personal data at home and abroad and transfer of these to real and legal third parties at home and abroad is carried out pursuant to the provisions of Emaar Group's policies on protection of personal data together with Code on Protection of Personal Data and provisions of related legislation.

## 7. Security of Personal Data

**Emaar Group Human Resources Department** carries out the obligations concerning data security pursuant to Code on Protection of Personal Data and provisions of related legislation and Emaar Group's Policy on Protection of Personal Data.

## 8. Rights Associated with Personal Data

Data owners may use the rights related to them pursuant to the provisions of Emaar Group's policies on protection of personal data together with Code on Protection of Personal Data by applying to **Emaar Group Human Resources Department**.

**9. Measures for the Protection of Personal Data and Maintaining these Correctly and Currently**

**Emaar Group Human Resources Department** protects personal data pursuant to Code on Protection of Personal Data and provisions of related legislation and Emaar Group's Policy on Protection of Personal Data.

**10. Deletion, Demolition or Anonymization of Personal Data**

**Emaar Group Human Resources Department** may delete, demolish or anonymize personal data acquired with the explicit consent of candidates during recruitment process **pursuant to** Code on Protection of Personal Data and provisions of related legislation and Emaar Group's Policy on Protection of Personal Data **provided that processing conditions** are completely disappeared.