

# TURKEY

ANNEX TO THE GLOBAL PRIVACY STATEMENT

Last updated on: 1 October 2024

## WHAT IS THIS ANNEX ABOUT AND WHEN IT IS RELEVANT TO YOU

This annex to the CNH Global Privacy Statement contains additional information and details which are specific to Turkey.

This annex is relevant to you if:

- your Personal Data is processed by an CNH entity established in Turkey;
- you are in Turkey and your Personal Data is processed by a CNH entity outside Turkey that offers goods or services to individuals in Turkey.

## APPLICABLE DATA PROTECTION LAW

The applicable data protection law in Turkey is the Law on Protection of Personal Data No. 6698, which came into effect on April 7th, 2018 (KVKK).

Other than the KVKK, there are a few other central legislative measures that constitute the framework of the protection of Personal Data in Turkey.

## LEGAL JUSTIFICATION FOR THE PROCESSING OF PERSONAL DATA UNDER THE KVKK

The KVKK provides seven legal justifications for the processing of Personal Data. Under the KVKK, at least one of these must apply for the processing of Personal Data to be lawful.

You can find an explanation of the legal justifications for the processing of your Personal Data in Section 3 of the Privacy Statement.

## SPECIAL CATEGORIES OF PERSONAL DATA UNDER THE KVKK

Certain types of Personal Data are subject to additional protection under the KVKK. The special category, which is not commonly listed in privacy laws, includes:

- clothing and appearance

The reason “clothing and appearance” is treated as special categories of Personal Data is that clothing preferences of individuals may be based on their beliefs and local traditions and processing of such data may cause the data subject to face discrimination or another unequal treatment.

## INTERNATIONAL DATA TRANSFERS

Cross-border data transfers can be carried out if one of the following conditions is met.

- **Consent:** The data subject has given his/her explicit consent; or
- **Safe Countries List:** (i) one of the legal justifications set forth under Article 5/2 or Article 6/3 of the Turkish DPL is present, and (ii) the country to which data will be transferred is listed by the Turkish Data Protection Authority (Turkish DPA) as a safe country (Safe Country); or
- **Turkish DPA Approval:** If the country where the data will be transferred is not considered a Safe Country under the Turkish DPA, (i) one of the legal grounds set forth under Articles 5/2 and 6/3 of the Turkish DPL must exist, (ii) the parties must commit in writing that the transfer is concluded under an adequate level of protection, and (iii) the Turkish DPA has approved the transfer.

## YOUR PRIVACY RIGHTS

If you wish to exercise one or more rights you are granted by applicable data privacy law, you can submit a request to us at any time by:

- completing the online [Privacy Request Form](#)
- sending an email to: [Privacy-EMEA@cnhind.com](mailto:Privacy-EMEA@cnhind.com)