



EYPTR Privacy Statement

The European Youth Parliament Türkiye values your privacy and the protection of your personal data. Our goal is for you to be and feel safe when we process your personal data both during and outside our sessions. That is why we are committed to keeping your personal data safe and comply with applicable data protection legislation, not least through transparency about our processing through this statement.¹

1. Who is responsible for your personal data?	1
2. How and what personal data do we process?	2
Management of membership	2
Application for funding	2
Management of sessions/events	4
National Selection Process	4
Promote the association and its events	4
Streamline the work of the media team	4
Conform to legal obligations	
Operate the Website and understand how it is used	6
3. From where do we source your personal data?	9
4. What other parties do we disclose your personal data to?	9
5. What are your privacy rights?	10
6. How do we store your personal data?	11
7. How will we make changes to this statement?	12

1. Who is responsible for your personal data?

The European Youth Parliament Türkiye is the legal entity who assumes the role of data controller, meaning that we determine the purposes and means of the processing of your personal data.

Legal Name: Avrupa Gençlik Parlamentosu Derneği (AGPD)

Address: Tomtom Mahallesi, İstiklal Caddesi, Beyoğlu İş Merkezi, No:187 Kat:2 D:145 Beyoğlu /
İstanbul // Türkiye

Email Address: privacy@eyp.org.tr

Website: eyp.org.tr

¹Pursuant to Law No. 6698 on the Protection of Personal Data (KVKK); Art. 4 (general principles), Art. 10 (obligation to inform), Art. 11 (rights of data subjects).



2. How and what personal data do we process?

Purpose Management of membership		
Personal data <u>General personal data</u> such as name, email address, phone number, date of birth, gender, and home address.		
What we do	Legal basis	Storage period
• Add and store your general personal data to our membership database. • Processing membership fees. • Check whether you are eligible to become a member. • Send summons and emails related to the annual meeting. • Send information letters via mail lists.	Legitimate interest, as we believe that our interest in fulfilling the purpose of the processing outweighs your interest in the protection of your personal data. You can obtain information on the balancing test upon request.	As long as you remain a member of EYP Türkiye. Please note that we may need to retain personal data longer due to legal obligations (e.g. bookkeeping laws; see below).
The data is shared with: • Human Resources Department of EYP Türkiye		
Your rights You have the right to object to such use of your personal data as we process on the basis of a legitimate interest. You do this by contacting privacy@eyp.org.tr. To read more about your rights see section 5. Also, You have the right to unsubscribe your current mail list by following the instruction below respective mails. Also, you do this by contacting privacy@eyp.org.tr. To read more about your rights see section 5.		



Purpose Management of sessions/events		
Personal data <u>General personal data</u> such as name, gender, date of birth, travel information, national committee, name & city of school <u>Participant contact information</u> such as name, full address, email, and phone number. <u>Parental/guardian contact details</u> such as name, phone number, email address and consent records. <u>Emergency contact details</u> such as name, full address, email, phone number, and relationship to the participant. <u>Selection Panel sheets</u> for Delegates and Official roles <u>Health data</u> such as illnesses, allergies and special needs. <u>Financial information</u> such as bank details. <u>Personal data shared in communication channels</u> such as Slack or Discord.		
What we do	Legal basis	Storage period
- Contact you before, during, and after the event. - Allow our delegate support to assist you. - Determine who is a minor. - Conduct room allocations. - Receiving and Selecting participants by applications.	Legitimate interest, as we believe that our interest in fulfilling the purpose of the processing outweighs your interest in the protection of your personal data. You can obtain information on the balancing test upon request.	As long as it is necessary for the purposes for which the personal data are processed but for a maximum of 12 months. Selection Panel sheets will be deleted as soon as the session/event concludes. Financial information might be retained longer due to legal obligations (see below).
Arrange catering and accommodation in accordance with the participant's needs.	Consent	Emergency contact detail, parental/guardian data, and health data are deleted two weeks after the session.
The data is shared with: - National Committee Representatives - Event and National Safe Persons - Respective Organisers - Host School (if necessary) - Accommodation Provider		
Your rights You have the right to object to such use of your personal data as we process on the basis of a legitimate interest. To read more about your rights see section 5 .		



Purpose Conduct the National Selection Process		
Personal data <u>General personal data</u> such as name, e-mail, national committee and name of school. <u>Photos of participants</u> <u>Jury review</u> such as the notes taken by the Jury Team.		
What we do	Legal basis	Storage period
• Take a portrait picture during the beginning of the session so the Jury Team can identify you. • Documenting and evaluating performance at the session. • Score delegates and rank delegations. • Give feedback. • Inform other National Committees that you will participate in their sessions.	Legitimate interest, as we believe that our interest in fulfilling the purpose of the processing outweighs your interest in the protection of your personal data. It also lies in your interest to be able to receive feedback. Additionally, the selection process cannot be done without the jury being able to identify you. You can obtain information on the balancing test upon request.	Until the Jury Team has sent the delegation ranking to the national board and the window for feedback to delegates has closed.
The data is shared with: • National Committee Representative(s) • Jury Team of the Session		
Your rights You have the right to object to such use of your personal data as we process on the basis of a legitimate interest. You do this by contacting privacy@eyp.org.tr . To read more about your rights see section 5 .		



Purpose Promote the association and its events Streamline the work of the media team		
Personal data <u>Pictures and videos of participants</u> <u>Personal data shared in communication channels</u> such as Slack <u>Personal Data shared with the Media Team</u>		
What we do	Legal basis	Storage period
• Take pictures/videos • Take a portrait picture of participants who have chosen not to consent, so the Media Team can accommodate their wishes when editing for example. • Edit the pictures/videos/personal data from media projects (e.g. color correction, remove/blur personal data of participants who have chosen not to consent to sharing clear pictures etc.). • Share the session picture. • Share pictures/videos where participants' faces are not clearly visible such as when blurred or when it is taken from behind. • Marketing communication on social media and per email to past participants (e.g. calls for official).	Legitimate interest, as we believe that our interest in promoting the association and its events <u>as well as</u> streamlining the work of the media team outweighs your interest in the protection of your personal data. You can obtain information on the balancing test upon request.	All pictures/videos/other personal data participants' choose to share when participating in a media team project are stored as long as it is necessary for the purposes for which the personal data are processed. Portraits for identification purposes are removed when post-production is complete.
• Share other pictures/videos than described above such as small group pictures or close-up pictures. • Marketing communication on social media (e.g. calls for official). • Share media team projects.	Consent.	Your email is stored until you unsubscribe, unless we process it due to another purpose & legal basis. For the rest, see above.
The data is shared with: • Our umbrella organisation, EYP Network (Schwarzkopf Foundation), https://eyp.org/privacy-policy/ • Meta Platforms, Inc. https://www.facebook.com/privacy/explanation/ (e.g. pages, groups and Instagram) • Google LLC https://policies.google.com/privacy/ (e.g. storage restricted to session officials) • Flickr, Inc https://www.flickr.com/help/privacy (Picture database restricted to the EYP Network) • Canva Pty Ltd. https://www.canva.com/policies/privacy-policy/		

**Your rights**

You have the right to withdraw your consent at any time. You do this by contacting privacy@eyp.org.tr. Please note, however, that a withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal. You also have the right to object to such use of your personal data as we process on the basis of a legitimate interest. To read more about your rights see [section 5](#).

Purpose

Conform to legal obligations

Personal data

Contact information such as name, National ID Number, Occupation, address, email and phone number.

Payment information such as bank account number, invoices and receipts.

Any other necessary data

What we do	Legal basis	Storage period
• Personal data processing that is necessary to fulfil in legal statutes or court decisions. • Add and store your general personal data to our legal institution AGPD's database, if requested. • Maintain financial records. • Disclose data to public authorities. (e.g. tax office, district governorship) where required by law.	Legal obligation.	Determined by legal requirements: Financial Records: 10 years. Association membership records: 5 years after membership ends (Associations Law Art. 32). Other legal obligations: As required by the relevant legislation.

The data is shared with:

- Supplier used for the internal work within the association (e.g. e-mail, document storage, accounting software etc.)
- Accountant / Independent Auditor
- Public Authorities

Your rights

To read more about your rights see [section 5](#).



Purpose Operate the website and understand how it is used		
Personal data <u>Technical data</u> collected automatically when you visit eyp.org.tr, such as IP address, browser type and version, operating system, access time and referring URL (server logs). <u>Cookie identifiers and the record of your cookie preference</u> stored in your browser. <u>Usage data</u> such as pages viewed, time spent on the site and approximate region.		
What we do	Legal basis	Storage period
- Keep the website running, secure and available. - Remember the cookie preference you have chosen, so that we do not ask you again on every visit. - Remember display settings such as light or dark mode.	Legitimate interest, as these are strictly necessary for the website to function and to remember the choice you have made. No consent is required for strictly necessary cookies under the Personal Data Protection Authority's Cookie Guidance. You can obtain information on the balancing test upon request.	Your cookie preference is stored in your browser until you clear it. Server logs are retained by our hosting provider only for as long as necessary for security and troubleshooting purposes.
- Measure visitor numbers, page views and general usage patterns using Google Analytics 4, so that we can improve the website. - page loading performance is measured by our hosting provider without cookies	Consent. Analytics cookies do not run at all unless you accept them. You can accept or reject them when you first visit the site, and change your choice at any time via the "Cookie Settings" link in the footer.	Up to 14 months from your last visit, or until you withdraw your consent, whichever comes first.
The data is shared with: Google LLC <https://policies.google.com/privacy/> (Google Analytics 4 — only where you have given your consent)		
Your rights You have the right to withdraw your consent to analytics cookies at any time, either via the		



"Cookie Settings" link in the footer of eyp.org.tr or by contacting [<privacy@eyp.org.tr>](mailto:privacy@eyp.org.tr). Please note, however, that a withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal. You also have the right to object to such use of your personal data as we process on the basis of a legitimate interest. To read more about your rights see section 5.

A full description of the cookies we use is available in our Website Privacy and Cookie Policy: <https://eyp.org.tr/privacy-policy>

Purpose		
Application for funding		
Personal data		
<u>General personal data</u> such as name, email address, date of birth, gender, address, and postal code.		
What we do	Legal basis	Storage period
• Disclose the membership database. • Processing necessary to obtain funding for our daily operations and activities.	Legitimate interest, as we believe that our interest in fulfilling the purpose of the processing outweighs your interest in the protection of your personal data. You can obtain information on the balancing test upon request.	As long as necessary to apply for funding, but no longer than two (2) years.
The data is shared with: • Authorities or other bodies from which we apply for funding.		
Your rights You have the right to object to such use of your personal data as we process on the basis of a legitimate interest. You do this by contacting privacy@eyp.org.tr. To read more about your rights see section 5.		



3. From where do we source your personal data?

We collect your personal data from the following sources:

- You **yourself**, when you contact us in any way such as sending an application or filling out a registration form.
- Your **parents or legal guardians**, if the participant is under age of consent.
- Your **school**, when you participate in their delegation to our sessions.
- Our **sister organisations**, when you are sent to our sessions from any of them.
- The **medical emergency sheet** filled out by participants of our sessions.

4. What other parties do we disclose your personal data to?

We share your personal data with the following categories of recipients:

- Our **departmental officers** for information such as general personal data of members registered in the geographical area of the region.
- Our **sister organisations** within the EYP Network (<https://eyp.org/get-involved/>), which is our **umbrella organisation** as a project of the Schwarzkopf Foundation. We share your data for example when sending you abroad or to inform our umbrella organisation if you are eligible to vote during elections.
- Video **teleconferencing** services, such as Google Meet.
- Instant messaging / **communication platform** services, such as Slack and WhatsApp.
- Travel agencies, travel operators, **accommodation** venues, and host schools, if necessary, in case of **travel** bookings such as for sessions, training events, or board meetings.
- **Logistics** companies and shipping agents when, for example, sending small packages in connection to meetings.
- Companies that offer **payment** solutions (banks and other payment service suppliers) when, for example, the delegation fee is paid.
- **Auditors** for review of the association's books and management.
- **Lawyers** and legal counsel, in case of disputes and other legal matters.
- **Public authorities**, if we either are required to do so under law, in order to apply for funding or upon suspicion of crime, or determine there is legitimate and proportional cause for such disclosure such as to search for missing persons.
- **Landlords** in connection with management of office premises and rental matters.
- **Insurance companies** in connection with management of insurance solutions.
- **Telecommunication companies** for phone services and other telecommunication services.



When your personal data is shared with a recipient that is an independent controller of personal data, the recipient's privacy policy and information regarding the processing of personal data applies.

As a principle rule, we only process your personal data within Türkiye. In cases where personal data is transferred abroad, such transfer is carried out in accordance with Article 9 of the KVKK, either based on an adequacy decision by the Personal Data Protection Board (KVKK Board) establishing that the destination country ensures an adequate level of protection, or where no such decision exists, on the basis of written undertakings providing sufficient guarantees and subject to the authorisation of the KVKK Board. You have the right to obtain information on the relevant safeguards upon request.

5. What are your privacy rights?

You may at any time exercise your rights under the KVKK by sending us an email:

privacy@eyp.org.tr

The right to access

This means that you have the right to request a record of our use of your personal data.

The right to rectification

We will, at your request or on your own initiative, correct, de-identify, delete or supplement information that we discover to be incorrect, incomplete or misleading. Please note that you have the burden of proof for demonstrating the inaccuracy or incompleteness of such data.

The right to erasure

We will remove your personal data if we no longer have a valid reason to retain these. As such, erasure will occur if:

1. the personal data are **no longer necessary in relation to the purpose** for which they were processed;
2. the personal data is **based on consent and you choose to withdraw** it, unless there is another legal ground for the processing;
 - However, the withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
3. you **object** to the processing and there are **no overriding legitimate grounds** for processing;
4. the personal data have been **unlawfully processed**; or
5. we have a **legal obligation to erase** the personal data.

However, there may be legal requirements or other compelling reasons why we may not immediately delete your personal information. In such cases, we will stop processing your



personal data for purposes other than complying with the law or which are not necessary for any other compelling reason.

The right to restrict processing

This means that we temporarily limit, i.e. freeze, the use of your personal data. You have the right to request a restriction when:

1. you **invoke the right to rectification** during which we verify the accuracy of the data in question,
2. we **process** the personal data **unlawfully** and you **do not wish it to be erased**,
3. we no longer need the personal data for the purposes of the processing but they are required by you for the establishment, exercise or defence of legal claims,
4. you object to processing as per “the **right to object**”, pending the verification whether our legitimate interest overrides those of yours.

The right to object

You have the right to object to our processing of your personal data when our legal basis for such data is legitimate interest. In such cases, we will only continue to process the data if we have compelling legitimate grounds which override your interests.

Object to Direct Marketing

We may use your email address for direct marketing purposes, for example, when we open a call for either delegates to sessions abroad or for officials to our sessions. If you do not wish for us to use your email address for direct marketing, you are welcome to contact us per email.

The rights in relation to automated decision making

We do not make use of automated decision making.

The right to lodge a complaint

You also have the right to lodge a complaint to the competent national supervisory authority, in particular, in the country of your habitual residence, place of work or of an alleged infringement of the KVKK.

6. How do we store your personal data?

We store your personal data securely using Google Workspace, which provides encrypted cloud storage maintained in Google's secure data centres. Access to our systems is protected for all EYP Türkiye accounts.

We apply a data classification system to ensure that your personal data is only accessible to those who need it. Access to sensitive data such as dietary requirements, health information or financial



records is strictly limited to the relevant organisers or board members, and is deleted as soon as it is no longer needed.

When your personal data is deleted, this is done **permanently** and **irreversibly**. Physical documents containing personal data are securely destroyed after the relevant event or process has concluded, except for when it is legally necessary for us to keep it.

In the event of a personal data breach, we will assess the risk without undue delay and notify the Personal Data Protection Board (KVKK Board) within 72 hours where required. If the breach is likely to result in a high risk to your rights and freedoms, we will also notify you directly.

7. How will we make changes to this statement?

This information may be updated. The most recent version will always be available on our website. If we make any significant changes in how we process your personal data, we will notify you per email. We recommend that you refresh your memory by reading this privacy statement prior to participating in any future session or event.

Lastly, please note that our sister organisations may to an extent process your personal data differently to what we do, which is why we encourage you to read their privacy statement as well, in particular, when participating in their sessions abroad.