

Employee Candidate Privacy Notice

As Codeway Dijital Hizmetler Anonim Şirketi and Codeway Barcelona SL (together, “**Codeway**”), acting as the data controller, we aim to inform you through this privacy notice about the processing of your personal data in connection with your employment application process.

For the purposes of this Privacy Notice:

- **Employee Candidate:** Means the natural person who applies for a position at Codeway.
- **Data Subject:** Means the natural person whose personal data is processed.
- **Personal Data:** Means any information relating to an identified or identifiable natural person.
- **Processing of Personal Data:** Means any operation or set of operations performed on personal data, whether wholly or partly by automated means or by non-automated means, provided that such processing forms part of a data recording system, including the collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or restriction of the use of personal data.
- **Data Controller:** Means the natural or legal person who determines the purposes and means of the processing of personal data and is responsible for the establishment and management of the data recording system.

I. Your Personal Data Processed and Categories of Personal Data

Data Categories	Personal Data Processed
Identity Information	Name-Surname, Nationality, Date of Birth, Age, Driver’s License Information, Gender
Contact Information	Address/Residential Address, Email Address, Telephone Number
Personnel Information	Information Contained in the Resume (CV), Professional/Personal Competencies, Foreign Language Proficiency, Interview Information (Date, etc.), Interview and Hiring Assessments, Military Service Information
Professional Experience Information	Education Information (University/Graduation Date/Field of Study), Applied-for Position/Title/Location/Type of Employment, Current or Previous Position/Title/Employer/Duration of Employment, Information Regarding Previous Professional Experience, Information Regarding Courses/Seminars Attended and Certificates/Awards/Recognitions Obtained for Professional Purposes, Social Media Accounts Containing Professional Work/Information (e.g., LinkedIn, GitHub, etc.), if provided, Portfolio
Visual Records	Photographs
Audio Recording	Audio Recordings Obtained Through Technological Solutions Used During Interview Sessions
Candidate Information	Visa Information, Salary Expectations, Information Provided About You by Individuals Provided as References, Transcripts Generated as a Result of Converting Audio Recordings into Text.

II. Purposes and Legal Grounds for the Processing of Your Personal Data

Data Category	Purpose of Processing	Legal Basis
• Identity Information • Contact Information • Personnel Information • Professional Experience Information • Visual Records • Audio Recordings • Candidate Information	Assessment of the applicant's suitability for the relevant position by recruitment specialists and managers based on the application, execution of recruitment and placement processes, planning of human resources processes, and carrying out retention and archiving activities for these purposes.	Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject
	Analysis of submitted applications using AI-powered tools and assessment of their suitability for the relevant position	Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject
• Identity Information • Contact Information • Personnel Information • Professional Experience Information • Visual Records • Candidate Information	Retention and archiving activities for the planning of human resources processes in relation to positions that may become available in the future, and communication with relevant candidates	Explicit consent
• Identity Information • Contact Information • Personnel Information • Professional Experience Information • Audio Recordings • Candidate Information	Audio recordings and transcription of audio recordings for the purposes of conducting candidate assessment activities and recruitment processes	

III. Processing of Your Personal Data Through Artificial Intelligence

Codeway may use artificial intelligence tools in its recruitment processes, in accordance with applicable legislation and for the processing purposes set out above under the heading “Purposes and Legal Grounds for the Processing of Your Personal Data.” In this context, Codeway uses third-party AI-powered tools in the following areas to enhance the efficiency and consistency of its recruitment and placement processes.

- Identifying candidates who may be suitable for an open position;
- Screening, parsing, and organizing application materials (e.g., resumes), and matching candidates’ skills and experience against the requirements of the relevant position;
- Assisting with or supporting the performance of recruitment-related assessments;
- Recording and transcribing interviews.

Please note that the aforementioned AI-powered tools are used to support our recruitment specialists and hiring managers in carrying out their respective processes. These tools do not replace such personnel or substitute human judgment. Codeway independently determines how and to what extent the outputs generated by these tools are used and remains solely responsible for the final decisions concerning your application and candidacy.

If you prefer that AI-powered tools, not be used in the assessment of your job application, please note that opting out of the use of such tools will not have any adverse effect on the evaluation of your application or your candidacy. In such case, your application will be evaluated through a process involving human review.

IV. Purposes of the Transfer of Your Personal Data and Categories of Recipients

The personal data referred to above is shared with the following categories of recipients for the purposes set out below:

- **With suppliers located abroad from whom we receive infrastructure services**, for the purposes of obtaining information technology infrastructure services, cloud services, electronic communications and email delivery services, and carrying out data retention and archiving activities;
- **With suppliers located abroad from whom we receive services for the management of human resources processes**, for the purposes of managing human resources processes, collecting job applications, providing services for the simultaneous transcription of audio recordings into written text, and managing candidate assessment processes through AI and other similar technologies,
- **With overseas subsidiaries and affiliates**, for the purposes of ensuring that human resources processes are carried out in a coordinated manner among the Group companies.

V. Method of Collection of Your Personal Data

Your personal data is collected and processed through automated means, in electronic and physical environments, via the information and documents you provide to us for the purposes set out above.

VI. Your Rights as a Data Subject and Contact Information

Under the applicable legislation on the protection of personal data, you may exercise your data subject rights by submitting an application through any of the following methods:

a. For Turkey

- (i) In writing to the address “Esentepe Mh. Büyükdere Caddesi Ferkoo Apt. No:175/141 Şişli/İstanbul”,
- (ii) via email, from the email address previously notified to us and registered in our systems, to hello@codeway.co,
- (iii) via registered electronic mail to the registered electronic mail address codewaydijital@hs02.kep.tr,

If responding to your application requires an additional cost, you may be required to pay a fee.

b. For Spain

- (i) In writing to the address “Avenida de Roma, 81 (Estel Building), 08029 Barcelona, Spain”,
- (ii) via email, from the email address previously notified to us and registered in our systems, to hello@codeway.co,

Kind regards.

Last Update Date: 5 October 2026

Explicit Consent Texts for Employee Candidates

1- Explicit Consent Text for Audio Recording

To ensure that your interview experience is conducted seamlessly and without unnecessary distractions, based on your explicit consent, we use an AI-powered note-taking tool to record and transcribe our interviews. This enables you to focus fully on the interview and is intended to ensure that your responses provided during the interview are accurately and completely recorded.

For further information regarding this process, please refer to the Employee Candidate Privacy Notice.

The audio recording of your interview and the transcript generated from such recording will be used and transferred solely for the purposes of internal evaluation and the conduct of recruitment processes.

If you do not wish to provide your explicit consent to the recording of your interview, you may choose not to provide such consent on this page. Choosing not to provide your explicit consent will not adversely affect the evaluation of your candidacy or your status in the recruitment process in any way.

In this regard, do you consent to Codeway recording your interview?

- ☐ Yes, I consent to the recording of my interview.
- ☐ No, I do not provide my consent to the recording of my interview.

2- Explicit Consent Text for the Retention of Candidate Information for the Purpose of Contacting Relevant Candidates at a Later Date

Your application is important to us. In this context, based on your explicit consent, we may retain the information and documents you provide to us during the application process for up to two years following the date of your application, for the purposes of planning our human resources processes in relation to suitable positions that may become available in the future and contacting you regarding such opportunities.

For further information regarding this process, please refer to the Employee Candidate Privacy Notice.

In this regard, do you consent to Codeway contacting you regarding suitable job opportunities for up to 2 years following the date of your application?

- ☐ Yes, I consent.
- ☐ No, I do not provide my consent.