

# **KVKK & GDPR NEWSLETTER**

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# 01

## Vava Cars Turkey Otomotiv Anonim Şirketi Data Breach Notification

You can access the information regarding the data breach notification, which was decided to be published by the Board on November 9, 2023 and took place on October 31, 2023 and was detected on the same day, below. The breach was the result of an internal user's credentials being compromised and used to access application data. It is stated that the identity, contact, finance and other data categories of employees, users, subscribers/members, customers and potential customers affected by the breach.

You can find the details of the data breach notification [here](#). (In Turkish)

# 02

## Demirkol Otel İşletmeciliği Turizm ve Tic. A.Ş. Data Breach Notification

The breach occurred on November 4, 2023 with a ransomware attack. It was determined that the personal data categories of the five people affected by the breach were identity, communication, location, personnel, legal transaction, customer transaction, transaction security, risk management, finance, professional experience, marketing, audiovisual records, and race and ethnicity information.

You can find the details of the data breach notification [here](#). (In Turkish)

# 03

## BS Bizim Personel Danışmanlık Hiz. A.Ş. Data Breach Notification

In the data breach notification submitted to the Board by BS Bizim Servis Personel Danışmanlık Hiz. A.Ş., which has the title of data controller, it was determined that the breach took place on October 26, 2023 with a ransomware attack. It is stated that the categories of personal data affected by the breach are identity, personnel, legal action, transaction security, union membership, criminal conviction and security measures.

You can find the details of the data breach notification [here](#). (In Turkish)



# 04

## Union of Chambers of Agriculture of Türkiye Data Breach Notification

In the personal data breach notifications submitted to the Board by the Union of Chambers of Agriculture of Türkiye, which has the title of data controller, it was determined that the breach occurred on November 20, 2023 and that a user registered in the Chambers of Agriculture Information System (ZOBIS) performed MERNIS web service inquiries from different IP addresses using his account information.

You can find the details of the data breach notification [here](#). (In Turkish)

# 05

## Kaymek Kayseri Mesleki Eğitim ve Kültür A.Ş. Data Breach Notification

In the data breach notification submitted to the Board by Kaymek Kayseri Mesleki Eğitim ve Kültür A.Ş., which has the title of data controller, it was determined by the letter sent to the data controller by the Information Technologies and Communication Authority Information Technologies Department and it was determined that the violation occurred by clicking on the link sent via e-mail. It is stated that the categories of personal data affected by the breach are identity, contact, location, personal and race and ethnicity from the category of sensitive personal data.

You can find the details of the data breach notification [here](#). (In Turkish)





# 06

## Swedish DPA Decided to Impose an Administrative Fine on H&M

Swedish DPA (IMY) has initiated a supervision of H&M due to six complaints from individuals who objected to receiving direct marketing from the company. The complaints come from people among other in Poland and Italy but have been handed over to IMY because H&M has its headquarters in Sweden. In its decision, IMY states that H&M has violated the GDPR by not ceasing to handle the complainants' personal data for direct marketing without undue delay, despite the complainants objecting to this. The decision states that the company did not have sufficient systems and routines in place to make it easier for those who complained to exercise their right to object to direct marketing. IMY issues an administrative fine of SEK 350,000 (approximately 28,500 EUR) against the company for violations of the GDPR.

Details of the summary of the decision can be found [here](#).

# 07

## Decision to Impose an Administrative Fine by French DPA to Groupe Canal by Data Protection

French DPA (CNIL) has received a number of complaints concerning difficulties encountered by individuals in having their rights taken into account by GROUPE CANAL+, publisher of channels and distributor of pay-television offers. The French DAP imposed a fine of EUR 600,000 on GROUPE CANAL.

Details of the summary of the decision can be found [here](#).





# 08

## Croatian DPA Imposed an Administrative Fine on EOS Matrix

On March 22, 2023, the Croatian Data Protection Authority received an anonymous petition indicating unauthorized processing of a very large number of personal data of natural persons (debtors) by the debt collection agency (data controller) EOS Matrix d.o.o. The petition was accompanied by a USB stick containing 181641 personal data in the form of name, surname, date of birth and identification number of natural persons with outstanding debts to credit institutions purchased by EOS Matrix d.o.o. The petition also stated that 294 natural persons in the database were minors at the time of compilation of the database. The Croatian Data Protection Authority imposed an administrative fine of EUR 5,470,000.00 on the data controller EOS Matrix d.o.o. for violation of Articles 5, 6, 9, 12, 13 and 32 of the GDPR.

Details of the summary of the decision can be found [here](#).

# 09

## Administrative Fine Imposed on Swedish School by Swedish DPA

Swedish DPA (IMY)'s review was initiated as a result of complaints which claimed that Aspudden's school, which belongs to the City of Stockholm, conducts comprehensive camera surveillance in large parts of the school and that no information about the camera surveillance has been provided to guardians and students. IMY criticizes the school for the choice of legal basis for the camera surveillance, that all camera surveillance took place around the clock and that the cameras' recording area was not limited but filmed too large areas for the purposes. All in all, the deficiencies found mean that IMY issues an administrative sanction fee of SEK 800,000 (approximately 67,950 EUR) against the Board of Education in the City of Stockholm. IMY instructs the school to limit the camera surveillance during the day and also presents views on how the school should inform about the camera surveillance that takes place.

Details of the summary of the decision can be found [here](#).



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Should you have any requests for the English translation of the announcements and decisions of the Turkish DPA, please contact us.

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