

# **KVKK & GDPR NEWSLETTER**

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## Decision Summaries • KVKK-GDPR Reviews • Data Breach Notifications •

# 01

### Yamaha Motor Europe N.V. Data Breach Notification

As a result of the data controller's notification of the vulnerability in the Customer Records Management (CRM) system, it has been stated that the breach has been detected on March 26, 2024. It turns out that the vulnerability has been caused by a misconfiguration in the customer portal running on the CRM system, and due to this misconfiguration, any registered user can access the personal data of other users. Personal data affected by the breach includes name-surname, gender, e-mail address and (internal) customer number. For a small number of people, in addition to this information, data such as postal address and phone number are also affected by the breach.

Details of the data breach notification can be found [here](#). (In Turkish)

# 02

### TTZ Pazarlama Plastik Sanayi Limited Şirketi Data Breach Notification

TTZ Pazarlama Plastik Sanayi Limited Şirketi, which has the title of data controller, has reported that it has experienced a data breach as a result of a cyber-attack. The breach began on April 13, 2024, and was detected on April 19, 2024. The data affected by the breach includes identity, contact, location, and many other categories of personal data. In addition, sensitive personal data such as health information has also been affected. The number of people and records affected by the breach could not be determined, and the affected groups included employees, customers, and prospects.

Details of the data breach notification can be found [here](#). (In Turkish)

# 03

### Titiz Plastik Dış Ticaret ve Sanayi Limited Şirketi Data Breach Notification

Titiz Plastik Dış Ticaret ve Sanayi Limited Şirketi has notified the Board that there has been a data breach as a result of a cyber-attack. In the breach, it was stated that some of the company's data was encrypted and a ransom was demanded from the data controller. The data affected by the breach includes identity, contact, and various categories of personal data, as well as sensitive data such as health information. The number of people and records affected by the breach has not yet been determined, and those affected include employees, customers, and potential customers.

Details of the data breach notification can be found [here](#). (In Turkish)

# 04

## SporPark Ayakkabı Tekst. ve Spor Malz.Tic. Ltd. Şti. Data Breach Notification

According to the data breach notification made to the Board by SporPark Ayakkabı Tekst. ve Spor Malz. Tic. Ltd. Şti., cyber attackers seized the username and password of a person and seized the data of other users in the system. The number of people affected by the breach could not be determined. The affected groups are employees, users, members, and customers.

Details of the data breach notification can be found [here](#). (In Turkish)

# 05

## Modaselvim Tekstil San. ve Tic. A.Ş. Data Breach Notification

According to the data breach notification submitted to the Board by Modaselvim Tekstil San. ve Tic. A.Ş., it has been determined that unauthorized access to the systems has been obtained as a result of the seizure of the user information of the company official. The violation was revealed by a blackmail email received on 20.04.2024, but the start date of the violation could not be determined. It was stated that efforts are underway to determine the number of people and records affected by the breach.

Details of the data breach notification can be found [here](#). (In Turkish)



# 06

## Greek Data Protection Authority Has Decided to Impose Administrative Fines for Non-Compliance with Technical and Organizational Measures

"HELLENIC POST SERVICES S.A." (ELTA S.A.) has reported two breach incidents to the Hellenic Supervisory Authority (SA), in accordance with the GDPR. The first incident involves a breach of data encryption for the purpose of demanding ransom in the company's system, resulting from a malicious attack by third parties, while the second incident involves the leakage of personal data, which was subsequently published on the Dark Web.

From the investigation of the incident, the Hellenic DPA found that the controller did not comply with the required technical and organisational measures and failed to ensure the implementation of the processing security policy. This failure resulted in breaches within the controller's system, including vulnerability scanning, unauthorized access to the system resources, execution of malicious processes, disabling of security software, and file encryption.

A fine of 1% of the last available annual turnover was imposed on the data controller on the basis of criteria assessed in accordance with EDPB Guidelines 4/2022 on the calculation of administrative fines.

You can find the detail of the decision [here](#).

# 07

## Icelandic Data Protection Authority Has Decided to Impose Administrative Fines Garðabær Municipality for Use of Google Workspace

In October 2021, the EDPB selected "the use of cloud in the public sector" for its 2022 Coordinated Enforcement Action. The Icelandic DPA decided to investigate the use of cloud services in elementary schools as part of this coordinated action. The investigation was limited to the use of Google Workspace for Education, Google's educational system, in the five largest municipalities in Iceland, in addition to the use of Seesaw in the municipality of Garðabær.

The Icelandic DPA's investigation revealed that students' personal data were not only processed on the instructions of the municipality of Garðabær, but also for Google's own purposes. The municipality failed to demonstrate how further processing by Google was compatible with the purpose for which students' personal data were initially collected i.e., in order to provide education in accordance with the national compulsory school act.

As a result, the Icelandic DPA imposed a fine of approximately, EUR 16.590 (ISK 2,500,000) on the municipality of Garðabær.

You can find the detail of the decision [here](#).

# 08

## Icelandic Data Protection Authority Has Decided to Impose Administrative Fines Kópavogur Municipality for Use of Google Workspace

In October 2021, the EDPB selected “the use of cloud in the public sector” for its 2022 Coordinated Enforcement Action. The Icelandic DPA decided to investigate the use of cloud services in elementary schools as part of this coordinated action. The investigation was limited to the use of Google Workspace for Education, Google’s educational system, in the five largest municipalities in Iceland, in addition to the use of Seesaw in the municipality of Kópavogur.

The Icelandic DPA’s investigation revealed that students’ personal data were not only processed on the instructions of the municipality of Kópavogur, but also for Google’s own purposes. The municipality failed to demonstrate how further processing by Google was compatible with the purpose for which students’ personal data were initially collected i.e., in order to provide education in accordance with the national compulsory school act.

As a result, the Icelandic DPA imposed a fine of approximately, EUR 19.907 (ISK 3,000,000) on the municipality of Kópavogur.

You can find detail of decision [here](#).

# 09

## Icelandic Data Protection Authority Has Decided to Impose Administrative Fines Reykjanesbær Municipality for Use of Google Workspace

In October 2021, the EDPB selected “the use of cloud in the public sector” for its 2022 Coordinated Enforcement Action. The Icelandic DPA decided to investigate the use of cloud services in elementary schools as part of this coordinated action. The investigation was limited to the use of Google Workspace for Education, Google’s educational system, in the five largest municipalities in Iceland, in addition to the use of Seesaw in the municipality of Reykjanesbær.

The Icelandic DPA’s investigation revealed that students’ personal data were not only processed on the instructions of the municipality of Reykjanesbær, but also for Google’s own purposes. The municipality failed to demonstrate how further processing by Google was compatible with the purpose for which students’ personal data were initially collected i.e., in order to provide education in accordance with the national compulsory school act.

As a result, the Icelandic DPA imposed a fine of approximately, EUR 16.590 (ISK 2,500,000) on the municipality of Reykjanesbær.

You can find the detail of the decision [here](#).

# 10

## Icelandic Data Protection Authority Has Decided to Impose Administrative Fines Hafnarfjörður Municipality for Use of Google Workspace

In October 2021, the EDPB selected “the use of cloud in the public sector” for its 2022 Coordinated Enforcement Action. The Icelandic DPA decided to investigate the use of cloud services in elementary schools as part of this coordinated action. The investigation was limited to the use of Google Workspace for Education, Google’s educational system, in the five largest municipalities in Iceland, in addition to the use of Seesaw in the municipality of Hafnarfjörður.

The Icelandic DPA’s investigation revealed that students’ personal data were not only processed on the instructions of the municipality of Hafnarfjörður, but also for Google’s own purposes. The municipality failed to demonstrate how further processing by Google was compatible with the purpose for which students’ personal data were initially collected i.e., in order to provide education in accordance with the national compulsory school act.

As a result, the Icelandic DPA imposed a fine of approximately, EUR 18.580 (ISK 2,800,000) on the municipality of Hafnarfjörður.

You can find the detail of the decision [here](#).

# 11

## Icelandic Data Protection Authority Has Decided to Impose Administrative Fines Reykjavík Municipality for Use of Google Workspace

In October 2021, the EDPB selected “the use of cloud in the public sector” for its 2022 Coordinated Enforcement Action. The Icelandic DPA decided to investigate the use of cloud services in elementary schools as part of this coordinated action. The investigation was limited to the use of Google Workspace for Education, Google’s educational system, in the five largest municipalities in Iceland, in addition to the use of Seesaw in the municipality of Reykjavík.

The Icelandic DPA’s investigation revealed that students’ personal data were not only processed on the instructions of the municipality of Reykjavík, but also for Google’s own purposes. The municipality failed to demonstrate how further processing by Google was compatible with the purpose for which students’ personal data were initially collected i.e., in order to provide education in accordance with the national compulsory school act.

As a result, the Icelandic DPA imposed a fine of approximately, EUR 13.270 (ISK 2,000,000) on the municipality of Reykjavík.

You can find the detail of the decision [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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