

PRIVACY NOTICE ON SECURITY CAMERA RECORDING AND EXCEPTIONAL AUDIO RECORDING

Data Controller: Falcon Tactical Range Club Silah Eğitim ve Güvenlik Hizmetleri Limited Şirketi

Address: Merkez Mahallesi Begonvil Sokak Nef 03 A ve B Blok 1/1I Kağıthane/İstanbul

Email Address: kvkk@falconrangeclub.com

Scope

A security camera system is used at the shooting range and associated areas operated by Falcon Tactical Range Club Silah Eğitim ve Güvenlik Hizmetleri Limited Şirketi at Merkez Mahallesi Begonvil Sokak Nef 03 A ve B Blok 1/1I Kağıthane/İstanbul to ensure the security of the facility, employees, customers, members, firearms, ammunition and other equipment.

This notice has been prepared to inform data subjects about video recording carried out through security cameras located within the shooting range premises and the processing of audio data, which may be undertaken only under the exceptional circumstances described below.

Areas Monitored by Cameras

The security camera system is used at the entrances and exits of the shooting range facility, the reception and registration area, waiting and recreational areas, entrance and exit points to the firing line, shooting rooms, the observation room, firearm and ammunition handover areas, firearm storage areas, storage rooms, shared passageways, administrative areas, offices, the exterior perimeter of the building and other areas where security requirements necessitate its use.

The cameras' fields of view are limited to what is necessary for security purposes. No video or audio recording is carried out in restrooms or similar private areas.

Personal Data Processed

The following personal data may be processed through the security camera system:

1. Video images of individuals within the cameras' fields of view.
2. Operational security data, such as the recording date and time, camera location, recording number, and access and activity logs.
3. Audio data and the content of spoken communications processed in the shooting area and observation room, solely where necessary in relation to an exceptional and specific security incident and strictly limited to that incident.

Purposes of Processing Video Recordings

Video recordings are processed for the following specific and limited purposes:

4. Ensuring the security of the shooting range facility, shooting areas, firearms, ammunition, other equipment and physical assets.
5. Monitoring occupational health and safety measures during shooting activities and identifying serious security breaches, accidents and dangerous conduct.
6. Preventing or investigating unauthorised access, irregularities involving firearms and ammunition, theft, damage, assault and other unlawful acts.
7. Responding promptly to serious security incidents that have occurred or may occur, establishing the circumstances of such incidents, and conducting the necessary administrative or legal proceedings.
8. Responding to duly submitted requests for information and documents from competent public institutions and organisations, judicial authorities or law enforcement agencies.
9. Creating evidence and conducting legal dispute proceedings to the extent necessary for the establishment, exercise or protection of a right.

Principles Governing the Processing of Audio Data

Audio data processing is not used to assess employee performance, subject individuals to continuous surveillance, monitor day-to-day activities or serve general security purposes.

Audio recording shall take place only in the shooting room and observation room of the shooting range.

Audio recording is a measure that may be used only where an exceptional incident occurs, such as an incident involving a firearm, a risk of serious injury, an act directly threatening shooting safety, a suicide attempt, a serious violation involving firearms or ammunition, suspected criminal activity, or a similar incident requiring emergency intervention, and where the incident cannot be adequately established through video recording or less intrusive methods.

In such circumstances, audio data is processed only to the extent required by the nature of the incident and is limited to the area in which the incident occurred, the period during which it occurred, and the persons whose inclusion is necessary to establish the circumstances of the incident. Before a decision is made to undertake exceptional audio recording, an assessment is carried out as to whether the same purpose can be achieved by a less intrusive method.

Method of Collection and Legal Basis for Processing Personal Data

Your personal data is collected by wholly or partly automated means through the security camera systems located at the shooting range facility.

Video recording activities are based on the legal ground that processing is necessary for the legitimate interests of the Company in ensuring the security of the facility, firearms, ammunition, employees, members, customers and visitors, as well as the security of the physical premises.

Where video recordings must be used in connection with a specific security incident, an incident subject to judicial proceedings or a legal dispute, or must be submitted to competent

authorities, processing is based on the legal ground that it is necessary for the establishment, exercise or protection of a right.

Exceptional processing of audio data is carried out only where, in light of the circumstances of the specific incident, processing is necessary for the establishment, exercise or protection of a right. Audio data is not processed unless there is a specific legal ground or incident necessitating audio recording.

Transfer of Personal Data

Video recordings and audio recordings obtained on an exceptional basis may be transferred to the following categories of recipients, solely within the scope of the processing purposes and to the extent necessary:

10. Relevant departments within the Company whose access authorisation has been defined in writing in accordance with their duties, powers and responsibilities.
11. Where legal consultancy, information technology, camera system maintenance, security or technical support services are procured, service providers subject to obligations concerning confidentiality, data security and compliance with instructions.
12. Public institutions and organisations authorised by law, judicial authorities, law enforcement agencies and other competent authorities.
13. Lawyers, mediators, experts, insurance organisations and competent judicial authorities, to the extent necessary for the conduct of a legal dispute.

Your personal data is retained within the Company through information technology companies whose servers are located in Türkiye.

Retention Period and Disposal

Video recordings are retained, as a rule, for 45 (forty-five) days. Audio recordings obtained on an exceptional basis are retained only for the period necessary to investigate the incident and conduct the required legal proceedings.

The retention period for recordings ends when the purpose of processing no longer exists. At the end of that period, recordings are securely deleted, destroyed or anonymised.

In the event of a security incident, accident, complaint, disciplinary inquiry, investigation, lawsuit, enforcement proceedings or another legal dispute, the relevant recordings may be retained only to the extent necessary to conduct and conclude those processes and until the applicable limitation periods have expired.

Data Security Measures

Only persons who need access to the recordings in the performance of their duties and whose access authorisation has been defined may access them. The Company implements appropriate technical and organisational measures to prevent unlawful processing of, and access to, personal data and to ensure the security of the recordings.

Access, viewing, export, copying, deletion and destruction operations relating to the recordings are logged. Access controls, firewalls, strong passwords and physical security measures are implemented in the systems in which the recordings are stored.

Rights of Data Subjects and Application Procedure

Under Article 11 of Law No. 6698 on the Protection of Personal Data, you have the right to apply to the Company to:

- Learn whether your personal data has been processed.
- Request information concerning the processing of your personal data, if it has been processed.
- Learn the purpose of processing and whether your personal data is used in accordance with that purpose.
- Know the third parties to whom your personal data has been transferred.
- Request the rectification of personal data that has been processed incompletely or inaccurately.
- Request the deletion or destruction of your personal data where the applicable conditions are met.
- Request that the aforementioned rectification, deletion or destruction operations be notified to third parties to whom your personal data has been transferred.
- Object to an outcome adversely affecting you that results from the analysis of your personal data exclusively through automated systems.
- Seek compensation for damage suffered as a result of unlawful processing of your personal data.

You may submit applications concerning these rights to Falcon Tactical Range Club Silah Eğitim ve Güvenlik Hizmetleri Limited Şirketi, together with documents verifying your identity, in writing to Merkez Mahallesi Begonvil Sokak Nef 03 A ve B Blok 1/1I Kağıthane/İstanbul, or via the email address kvkk@falconrangeclub.com registered in the Company's system.

The application form prepared to facilitate your application is available on our website. [Click here to view the form.](#)