**ROBERT COLLEGE**

**WEBSITE CONFIDENTIALITY AND COOKIES POLICY**

It is primordial for Robert College (“**RC**” or “**the school**”) to protect the confidentiality of those who visit the school’s website [www.robcol.k12.tr](http://www.robcol.k12.tr). The Website Confidentiality Policy (“**Policy**”) includes details about (1) processing personal data, (2) Cookies Policy, and (3) the enforcement of the Website Confidentiality Policy.

1. **PROCESSING PERSONAL DATA**

The personal data accessed while you visit our website may be processed by the school in its capacity as data controller, as per the provisions of the Personal Data Protection Law 6698 (“**The** **Law**”) explained below. To learn more about the processing of your personal data, please see the RC Personal Data Protection Policy [*link*]

**THE PURPOSE OF PROCESSING PERSONAL DATA**

Your personal data acquired while you visit our website may be processed, in accordance with the articles 5 and 6 of The Law to conduct following proceedings: if you make a donation, to issue an invoice; if you are a parent, to facilitate access to the parents’ portal for the parents’ association’s contact information and activities, the times for parent-teacher meetings , the forms required by MEB, the weekly menus, the parents’ newsletter; if you are a student or a graduate, to make it easy for you to join projects or to write articles; or to submit your questions and comments about the residential life or the website for accomplishing purposes below:

* To accomplish the necessary tasks by the school’s various departments as required for the school’s activities,
* To conduct the operations to make the school’s services available to respective people,
* To plan and to implement the school’s human resources policies and processes,
* To ensure the legal, technical and commercial security of the school and of those who have a business relationship with the school.

**THE PARTIES TO WHOM YOUR PERSONAL DATA ARE TRANSFERRED, AND THE PURPOSE OF DATA TRANSFER**

Your personal data acquired while you visit our website may be transferred for the above stated purposes to our business partners, to our suppliers, to the legally authorized public institutions and agencies and natural persons, as per the provisions stipulated in articles 8 and 9 of The Law about the conditions and purposes of personal data processing.

**PERSONAL DATA COLLECTION METHOD, AND THE LEGAL GROUND**

Any informationrelating to an identified or identifiable natural person is considered as personal data. Your personal data acquired while you visit our website are collected, as per the data processing provisions in The Law, by cookies which are technology files.

**THE RIGHTS OF THE DATA SUBJECTS**

Article 11 of The Law defines your rights as below:

* To learn whether or not your personal data have been processed,
* If your personal data have been processed, to request information about it,
* To learn the purpose of processing your personal data, and whether or not they have been used for the intended purposes,
* To know which third parties within Turkey or abroad your personal data have been transferred to,
* To request rectification if your personal data are processed incompletely or inaccurately, and to ask that the third parties to whom your data were transferred be notified of the amendments,
* To request deletion or destruction of your personal data in the case that the reasons for processing the data have disappeared even though they were duly processed according to The Law, and ask that the third parties to whom your data were transferred be notified of this change,
* To object to the processing, exclusively by automatic means, of your personal data, which leads to an unfavourable consequences for you,
* To request compensation for any damages you incurred because of an unlawful processing of your personal data.

To submit your applications concerning your above rights, fill in the Robert College Data Subject Application Form which you can access at [www.robcol.k12.tr](http://www.robcol.k12.tr). Depending on the nature of your request, your application will be processed free of charge within the shortest possible time and within thirty days at the latest; however, in the case that the process involves additional charges, you may be asked for payment according to the tariff set by the Personal Data Protection Board.

1. **COOKIES POLICY**

We use cookies to make it possible for you to use our website most effectively, and to enhance your user experience. If you do not wish to use cookies, you can delete them on your browser settings, or deny access. However, we would like to point out that this would affect the way you use our website. As long as you do not change the cookies settings on your browser, we will assume that you accept them.

**WHAT ARE COOKIES, AND WHY ARE THEY USED?**

Cookies are short text files placed on your device or your server by the websites that you visit.

The main purposes of storing cookies on our website are:

* To enhance the functionality and the performance of the website in order to improve the services that we offer to you,
* To improve the website, to offer new features over the website, and to personalize the services that we offer to you,
* To ensure the legal and the commercial security of the website, of yourself, and of the school.

**THE TYPES OF COOKIES THAT WE USE ON OUR WEBSITE**

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| --- | --- |
| Session Cookies | These temporary cookies only last as long as you use our website and are deleted once you close your browser.  The main purpose of using such cookies is to ensure the smooth operation of the website for the length of time that you use it.  For example, they can facilitate filling out the online forms that are pages long. |
| Persistent Cookies | They are used to increase the functionality of the website and to offer faster and more efficient services to the visitors.  They identify the users’ preferences and are stored on your device by the browsers.  Some types of persistent cookies may be used to make you customized suggestions having regard to aspects such as your intended use of the website.  With the use of persistent cookies, the system checks if there is a cookie stored on your device by our website when you visit our website the next time; if yes, it determines the content that you will access and thus it offers you enhanced services. |

**THE COOKIES USED ON OUR WEBSITE**

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| Technical Cookies | They facilitate the correct functioning of the website and help identifying the web pages and the fields that do not function. |
| Authentication Cookies | When users access the website with their password, such cookies identify that they are site users and the users do not have to enter their password on each page over again. |
| Flash Cookies | They serve to activate the visual or audio content on the website. |
| Customization Cookies | To remember user preferences when they visit different pages on different websites, for example your language preference. |
| Analytical Cookies | They track the analytical results such as number of website visitors, the pages viewed, visiting periods of web site, the pages scrolled etc. |

**CAN COOKIES BE DISABLED BY DATA SUBJECTS ?**

You can customize your cookies preferences by changing the settings on your browser:

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| Adobe Analytics | <http://www.adobe.com/uk/privacy/opt-out.html> |
| AOL | [https://help.aol.com/articles/restore-security-settings-and-enable-cookie- settings-on-browser/](https://help.aol.com/articles/restore-security-settings-and-enable-cookie-%20settings-on-browser/) |
| Google Adwords | <https://support.google.com/ads/answer/2662922?hl=en> |
| Google Analytics | <https://tools.google.com/dlpage/gaoptout> |
| Google Chrome | <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647> |
| Internet Explorer | [https://support.microsoft.com/en-us/help/17442/windows-internet-explorer- delete-manage-cookies/](https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-%20delete-manage-cookies/) |
| Mozilla Firefox | <http://support.mozilla.com/en-US/kb/Cookies> |
| Opera | <http://www.opera.com/browser/tutorials/security/privacy/> |
| Safari | <https://support.apple.com/kb/ph19214?locale=tr_TR> |

1. **ENFORCEMENT OF THE WEBSITE CONFIDENTIALITY POLICY**

The Policy is effective from May 21, 2019. In the case that all or part of its content is updated, the effective date of the Policy will be amended accordingly.

The Policy is posted on the school’s website ([www.robcol.k12.tr](http://www.robcol.k12.tr)) and is available to the personal data subjects.

Detailed information about the processing of personal data can be accessed at *link* (*RC Personal Data Protection Policy*).