

	<b>PERSONAL DATA STORAGE AND DESTRUCTION POLICY</b>	Document No:	KVK.PL004
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## 1. PURPOSE AND SCOPE

The purpose of this policy is to fulfil our obligations depending on the ‘Regulation on the Deletion, Destruction or Anonymization of Personal Data’ (“Regulation”) and to inform the data owners about the principles of determining the maximum storage time required for the purpose for which the personal data are processed, as well as the procedures and principles regarding the deletion, destruction and anonymization processes.

Personal data belonging to Company employees, employee job candidates, interns, suppliers, business partners, customers, visitors and other third parties are within the scope of this policy. This policy is applied to all recording environments where personal data is processed and activities for the storage and destruction of personal data managed by the Company.

## 2. DEFINITIONS

**Presidency/Başkanlık:** Presidency of the Personal Data Protection Authority.

**Board/Kurul:** Personal Data Protection Board.

**Institution/Kurum:** Personal Data Protection Institution.

**Law/KVKK:** Law No. 6698 Personal Data Protection.

**Information Text:** Information statement given to the data subject about the purpose, method of data collection, storing duration, how it is stored and rules of data sharing with third parties.

**Inventory:** Inventory is the list of personal data processing activities related with the business processes of the Data Controller. The purposes of data collection, processing reasons, categories, storing periods, groups of persons subject of the data, the rules of data sharing with internal and foreign data recipients and the precautions for data security are listed in relation with the Business Processes.

**Data Subject:** Natural person whose personal data is processed.

**Processing:** Depending on the Article 3 of KVKK, the process of ensuring personal data availability by means of recording, storing, preserving, changing, rearranging, disclosing, classifying, transferring and taking over.

**Personal Data:** Any information related to an identified or identifiable natural person. For example; name-surname, citizenship identification number, e-mail, address, date of birth, bank account number, etc.

**Processing of Personal Data:** Operations like obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, performed on personal data, such as in whole or in part, by automatic or non-automatic means, provided that it is part of any data recording system.

**Special Personal Data:** Personal data related with race, ethnic origin, religion, sect or other belief, political opinion, philosophical belief, dress code, association, foundation or union membership, health, sexual life, criminal conviction and security measures, biometric and genetic data.

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**VERBİS:** The information system that is used by Data Controllers to apply for registry and perform other registry related transactions; which is created and managed by the Başkanlık/Presidency and accessible via the internet.

**Data Controllers Registry:** Data Controllers Registry kept by the Presidency/Başkanlık.

**Data Controller:** A natural or legal entity who determines the purposes and means of personal data processing and responsible from management of data recording system.

**Data Processor:** A natural or legal entity who processes personal data on behalf of the data controller based on the authority granted by the data controller

**Data Controller Contact Person:** The natural person declared by the Data Controller during registration in the Registry, for communication with the Institution/Kurum regarding the obligations of legal entities resident in Turkey or not in Turkey, within the scope of the Law and secondary regulations to be issued based on this Law.

**Anonymization:** Processing of a personal data in a way that it cannot be associated with a natural person's identity.

**Deletion:** The process of making personal data inaccessible and non-reusable for the relevant users.

**Destruction:** The process of destroying relevant users' personal data by rendering it inaccessible, irreversible and non-reusable by anyone.

### 3. EXPLANATIONS FOR STORAGE AND DESTRUCTION

Personal data of data owners are processed, stored and destroyed by the Company in physical (Files, Folders, Cabinets, Archives) and electronic (Servers, Application Software, Databases, Portable Devices, Cloud) environments in a secure manner, within the limits specified by the KVKK and other relevant legislation. The personal data is used according to the purpose of obtaining them to realize commercial activities, to fulfil legal commitments, increase service quality, regulate employee rights, manage customer and supplier relations, fulfil storage and archive obligations.

#### 3.1. Reasons for Storage

Our Company stores personal data for the following purposes within the scope of its activities, for a period stipulated in the relevant legislation or in accordance with our processing purposes:

- Necessity for establishment and execution of contracts,
- Necessity for the purpose of establishing, using or protecting a right
- Mandatory for the Company's legitimate interests if it does not harm the fundamental rights and freedoms of individuals,
- For the Company's fulfilment of any legal obligation,
- Clearly stipulated in the legislation,
- Explicit consent of data owners, Explicit consent of data owners is available for storage activities that require explicit consent of data owners.

#### 3.2. Reasons for Destruction

According to the Regulation, in the following cases, personal data of data owners shall be deleted, destroyed or anonymized by the Company ex officio or upon the request of the data owner:

- Change or abolition of the relevant legislative provisions constituting the basis for the processing or storage of personal data,
- The purpose requiring the processing or storage of personal data is eliminated,

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- The conditions requiring the processing of personal data in Articles 5 and 6 of the KVKK are eliminated,
- In cases where the processing of personal data is carried out solely based on the condition of explicit consent, the relevant person withdraws his/her consent,
- The data controller accepts the application made by the relevant person for the deletion, destruction or anonymization of his/her personal data within the framework of his/her rights in Article 11 of the KVKK,
- If a complaint is made to the Board, about the data controller's rejection of an application made by the data owner requesting the deletion, destruction or anonymization of his/her personal data, or if the response given to the relevant person is found insufficient or if the company does not respond within the period stipulated in the Law and this complaint is approved by the Board then the relevant personal data is deleted or destroyed or anonymized.
- When the maximum period required the storage of personal data has expired and there are no conditions that would justify storing personal data for a longer period.

#### 4. TECHNICAL AND ADMINISTRATIVE MEASURES

In order to securely store personal data, prevent unlawful processing and access, and lawfully destroy personal data, the Company has taken technical and administrative measures within the framework of the measures determined and announced by the Board/Kurul for Special Personal Data in accordance with Article 12 and Article 6, paragraph 4 of the KVKK.

##### 4.1. Technical Measures

- Measures are taken for network and application security.
- VPN is used for personal data transfers via network.
- Security measures are taken for procurement, development and maintenance of Information Systems.
- Security of personal data stored in the cloud is ensured.
- Authorization matrix has been created for employees.
- Access logs are kept regularly.
- Corporate policies are prepared and implemented regarding Access, Information Security, Usage, Storage and Destruction.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Log records are kept in a way that prevents user intervention.
- Intrusion detection and prevention systems are used.
- Penetration tests are performed periodically.
- Cyber security measures have been taken, and their implementation is constantly monitored.
- Encryption is used.
- Data loss prevention software is used.
- Policies are applied to ensure data security during remote working.

##### 4.2. Administrative Measures

- Employees are periodically trained on Data Security.
- The Authorizations for employees whose duties changed or leave their jobs are immediately revoked.
- Disciplinary regulations that include data security provisions are in place for employees.

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- Personal data security policies and procedures have been announced and implemented.
- Policies and procedures for special personal data security are determined and implemented.
- Personal data is reduced as much as possible.
- Personal data security breaches are reported immediately.
- Personal data security is monitored.
- Physical security of environments containing personal data is ensured.
- Security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.
- Periodic and unplanned internal audits are conducted.
- Signed contracts include data security provisions.
- Awareness of data processing service providers is ensured on data security.
- Audits are conducted at regular intervals on data security of data processing service providers.

## 5. METHODS FOR DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

The Company deletes, destroys or anonymizes Personal Data at the end of the retention period of the relevant legislation or at the end of the retention period necessary for the purpose for which they are processed, or upon the request of the Data Owner.

### 5.1. Anonymization of Personal Data

Anonymization of personal data is the process of masking personal data in such a way that it cannot be associated with an identified or identifiable natural person, even if it is matched with other data. Our company may anonymize personal data when the reasons requiring the processing of personal data processed in accordance with the law are eliminated.

In accordance with Article 28 of the KVKK; anonymized personal data may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the KVKK and the explicit consent of the personal data owner is not required.

### 5.2. Deletion of Personal Data

Deletion of personal data is the process of making personal data inaccessible and non-reusable for the relevant users in any way. The Company may use the following techniques in order to perform the deletion of personal data in accordance with the law:

DATA RECORDING MEDIA	DELETION METHOD
Personal Data on the Servers	The access rights of the users on the directory where the file containing personal data is located are removed.
Personal Data in the Applications	Relevant users are prevented from accessing personal data by changing their access rights.
Personal Data on Portable Devices	Files containing Personal Data are encrypted to prevent the access of the relevant users.
Personal Data in the Physical Environment	Personal data for which the requiring storage period has expired, is made inaccessible and non-reusable by any means for employees other than the unit manager responsible for the archive.

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### 5.3. Destruction of Personal Data

To perform the lawful destruction of personal data by the Company, we may use the following techniques:

DATA RECORDING MEDIA	DESTRUCTION METHOD
Personal Data on the Servers	To destruct the personal data on servers' random data consisting of 0's and 1's is written over the relevant data to make it impossible to read and recover old data.
Personal Data in the Applications	The relevant lines containing personal data are destroyed with database commands (Delete etc.).
Personal Data on Portable Devices	Personal data in portable devices is destroyed by breaking, shredding or burning the relevant media or disks.
Personal Data in the Physical Environment	Personal data in the physical environment is destroyed by grinding with a paper cutting machine or by burning.

### 6. STORAGE AND DESTRUCTION PERIODS

Company determines the storage periods of personal data obtained depending on a retention period stated in the legislation.

PROCESS	STORAGE PERIOD	DESTRUCTION PERIOD
HR Employee processes	10 Years	First periodic destruction period following the end of the storage period
Sales, Offer and Contract processes	10 Years	First periodic destruction period following the end of the storage period
Accounting and Finance processes	10 Years	First periodic destruction period following the end of the storage period
Relations with Official Institutions	10 Years	First periodic destruction period following the end of the storage period
Customer Relations processes	10 Years	First periodic destruction period following the end of the storage period
Supplier Relations processes	10 Years	First periodic destruction period following the end of the storage period
Log Recording Systems	2 Years	First periodic destruction period following the end of the storage period
Camera Recordings	1 Month	First periodic destruction period following the end of the storage period

According to Article 11 of the Regulation, the period of periodic destruction has been determined by our Company as 6 (six) months. All transactions regarding the deletion, destruction and anonymization of personal data are recorded and the records in question are stored for at least three years, excluding other legal obligations.

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## 7. OWNERSHIP AND COMPLIANCE

The Company Data Controller is responsible for the implementation and monitoring of this Policy. If the Policy is updated, the update will enter into force on the date it is approved, and the most up-to-date version of the policy will be published on the company website.