

[AÇIK]



# PERSONAL DATA STORAGE AND DISPOSAL POLICY

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## 1. PURPOSE

This Personal Data Storage and Disposal Policy ("Policy") has been prepared by TRB 360("Company") as a data controller with the purpose of fulfilling the obligations of the Data Controller in accordance with the Personal Data Protection Law numbered 6698 ("Law") and the Regulation on Deletion, Destruction, or Anonymization of Personal Data, which constitutes the secondary regulation of the Law, and related legislation, and to inform about the principles of determining the maximum storage periods required for the purposes for which personal data are processed, as well as the processes of deletion, destruction, and anonymization.

## 2. SCOPE

This Policy has been prepared for the persons whose personal data are processed by TRB 360 through automatic or non-automatic means provided that they are part of any data filing system.

## 3. DEFINITIONS

Table 1. Definitions

Definition	Explanation
<b>Explicit Consent</b>	Consent about a specific subject is based on information and expressed in free will.
<b>Data Subject</b>	Refers to the natural person whose personal data are processed.
<b>Disposal</b>	Deletion, destruction, or anonymization of personal data.
<b>Law</b>	Refers to the Personal Data Protection Law No. 6698 published in the Official Gazette dated 07.04.2016 and numbered 29677.
<b>Recording Medium</b>	Any type of environment that keeps the personal data processed wholly or partially by automated means or non-automated means provided that form part of a data filing system.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Anonymization of Personal Data</b>	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.
<b>Processing of Personal Data</b>	Any operation that is performed on personal data, wholly or partially by automated means or non-automated means provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.

<b>Personal Data Subject</b>	Refers to the natural person whose personal data are processed.
<b>Deletion of Personal Data</b>	Making personal data inaccessible and unusable for the relevant users in any way.
<b>Destruction of Personal Data</b>	The process of rendering personal data inaccessible, irretrievable, or non-reusable by anyone, by no means.
<b>Board</b>	Personal Data Protection Board
<b>Periodic Disposal</b>	The deletion, destruction, or anonymization process is determined in the personal data storage and disposal policy and is to be carried out periodically ex officio, in the event that all of the conditions for processing laid down in the Law no longer exist.
<b>Data Processor</b>	The natural or legal person who processes personal data on behalf of the data controller upon its authorization.
<b>Data Filing System</b>	The system where personal data are processed by being structured according to specific criteria.
<b>Data Controller</b>	The natural or legal person who determines the purpose and means of processing personal data and is responsible for the establishment and management of the data filing system.
<b>Regulation</b>	Regulation on the Deletion, Destruction, or Anonymization of Personal Data was published in the Official Gazette on October 28, 2017.

#### 4. ABBREVIATIONS

Table 2. Abbreviations

Abbreviation	Explanation
IEC	International Electrotechnical Commission
ISO	International Organization for Standardization

## 5. REFERENCES AND RESOURCES

Table 3. References and Resources

Reference/Resource Number	Reference/Resource Name
6698	Personal Data Protection Law
-	Regulation on the Deletion, Destruction, or Anonymization of Personal Data
-	Communique on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform
-	Communique on the Principles and Procedures for the Request to Data Controller
ISO/IEC 27001:2013	Information Security Management System

## 6. Recording Medium of Personal Data

Personal data stored within the company are sensitively stored in the following recording mediums in accordance with the nature of the data and legal obligations.

The recording medium used for the storage of personal data is generally on paper and digital media such as servers, and hard or portable disks within the Company.

The Company takes all necessary technical and administrative measures in accordance with the nature of the relevant personal data and the medium in which it is kept in order to store personal data securely and to prevent unlawful processing and access.

These measures include but are not limited to, the following technical and administrative measures to the extent appropriate to the nature of the personal data and the environment in which it is kept within the scope of ISO/IEC 27001:2013 Information Security Management System.

All transactions regarding the deletion, destruction, or anonymization of personal data are recorded by the Company and such records are kept for a maximum of 15 (fifteen) years unless longer periods are required to be kept in accordance with other laws/legislation.

Unless otherwise decided by the Board, personal data will be disposed of by the Company at the end of the specified storage periods in the event that all of the conditions for processing personal data specified in Articles 5 and 6 of the Law are no longer applicable.

The deletion, destruction, and anonymization of personal data are carried out in full compliance with the Law, relevant regulations, decisions of the Board, and this Policy.

In the event that the data subject requests the Company to delete, destroy, or anonymize their personal data, the requests are responded to within 30 (thirty) days at the latest. In the event that the data subject to the request has been transferred to third parties in accordance with the Personal Data Protection and Processing Policy, this situation is notified to the third party to whom the data has been transferred and necessary actions are taken before the third party.

### 6.1. Technical Measures

The Company takes the following technical measures in accordance with the nature of all mediums where personal data is stored, the relevant data, and the medium in which the data is stored:

- Key management is implemented.
- The security of personal data stored in the cloud is ensured.
- Access logs are kept on a regular basis.
- Employees who are reassigned or leave their jobs are no longer authorized in this area.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Personal data is backed up and the security of backed-up personal data is ensured.
- User account management and authorization control systems are implemented and monitored.
- Log records are kept without user intervention.
- Attack detection and prevention systems are used.

## 6.2. Administrative Measures

The Company takes the following administrative measures in all mediums where personal data is stored in accordance with the nature of the relevant data and the medium in which the data is stored:

- There are disciplinary regulations that include data security provisions for employees.
- Training and awareness-raising activities on data security for employees are carried out at regular intervals.
- Corporate policies on access, information security, use, storage, and disposal have been prepared and implemented.
- Confidentiality undertakings are made.
- Signed contracts contain data security provisions.
- Extra security measures are taken for personal data transferred via paper and the relevant documents are sent in confidentiality-grade document format.
- Personal data security policies and procedures have been determined.
- Personal data security is monitored.
- Necessary security measures are taken for entry and exit to and from physical mediums containing personal data.
- Physical mediums containing personal data are secured against external risks (fire, flood, etc.).
- Security of mediums containing personal data is ensured.
- Personal data is minimized as much as possible.
- Existing risks and measures have been identified.
- Protocols and procedures for the security of special categories of personal data have been determined and implemented.
- Internal periodic and/or random audits are carried out and conducted.
- Data processing service providers are periodically audited for data security.

## 7. Explanations on Storage and Disposal of Personal Data

Personal data belonging to employees, employee candidates, visitors, and other persons, institutions, and organizations with whom the Company has a relationship are stored and disposed of in accordance with the Law.

In this context, detailed explanations regarding storage and disposal are given below respectively.

### 7.1. Explanations on Storage

Within the framework of our Company's activities, personal data are stored for the period stipulated in the relevant legislation or in accordance with our processing purposes.

### 7.2. Legal Reasons Requiring Storage

In our Company, personal data processed within the framework of its activities are stored for the period stipulated in the relevant legislation.

### 7.3. Storage and Disposal Processes

Your personal data are stored and processed in accordance with the conditions for the processing of personal data set out in Articles 5 and 6 of the Law, and in the event that all of the aforementioned conditions disappear, personal data are deleted, destroyed, or anonymized ex officio or upon the request of the personal data subject.

## 8. Personal Data Disposal Techniques

All transactions regarding the disposal processes are processed by our Company and such records are kept for at least 6 (six) months, excluding other legal obligations.

Unless otherwise decided by the Board, our Company chooses the appropriate method of ex officio deletion, destruction, or anonymization of personal data according to technological possibilities and implementation cost, and explains the reason for the appropriate method upon request of the personal data subject.

### 8.1. Methods for Deletion of Personal Data

Deletion of personal data is the process of making personal data inaccessible and non-reusable in any way for the relevant users. Our Company takes all kinds of technical and administrative measures according to technological possibilities and implementation costs in order to make deleted personal data inaccessible and unusable for the relevant users.

In this context, our Company applies the following methods for the deletion of personal data:

Table 4. Methods for Deletion of Personal Data

Data Recording Medium	Explanation
<b>Personal Data on Servers</b>	For the personal data on the servers, deletion is made by the IT Operations and Integration Directorate by removing the access authorization of the relevant users for those whose storage period has expired.
<b>Personal Data in Electronic Medium</b>	The personal data stored in electronic media that expire after the period of time required for their storage shall be rendered inaccessible and non-reusable in any way for employees (relevant users) other than the database administrator.
<b>Personal Data in Physical Medium</b>	Personal data on paper medium must be deleted using the blackout method. The blackout process is performed by cutting out the personal data on the relevant document, where possible, and making it invisible by using ink in a way that cannot be reversed and cannot be read with technological solutions.

### 8.2. Methods for Destruction of Personal Data

Destruction of personal data is the process of making personal data inaccessible, unrecoverable, and non-reusable by anyone in any way. Our Company takes all necessary technical and administrative measures regarding the destruction of personal data according to technological possibilities and the cost of implementation.

In this context, our Company applies the following methods for the destruction of personal data:



Table 5. Methods for Destruction of Personal Data

Data Recording Medium	Explanation
<b>Personal Data in Physical Medium</b>	The personal data on a paper medium whose storage period has expired shall be irreversibly destroyed in paper shredding machines.
<b>Personal Data in Magnetic Medium</b>	Physical destruction of personal data on a magnetic medium, such as melting, incineration, and pulverization, is applied to those whose storage period has expired.

### 8.3. Anonymization of Personal Data

Anonymization of personal data is to make personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if personal data is matched with other data. In order for personal data to be anonymized; personal data must be rendered unassociated with an identified or identifiable real person, even through the use of appropriate techniques in terms of the recording medium and the relevant field of activity, such as reversal and matching of data with other data by our Company, recipient or recipient groups. Our Company takes all necessary technical and administrative measures regarding the anonymization of personal data according to technological possibilities and implementation costs.

## 9. Storage and Disposal Periods of Personal Data

Table 6. Storage and Disposal Periods of Personal Data

Data Category	Storage Period	Disposal Period
<b>Identity</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Contact</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Personal</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Legal Transaction</b>	10 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Customer Transaction</b>	10 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Physical Space security</b>	6 months from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period

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<b>Transaction security</b>	2 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Finance</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Professional experience</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Marketing</b>	10 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Audio and Visual Recordings</b>	6 months from the Termination of the Legal Relationship or Rejection of the Application	At the first periodic disposal following the end of the storage period
<b>Health Information</b>	10 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Criminal conviction and security measures</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Philosophical Beliefs, Religions, Sects, and Other Beliefs</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Other - Reference Identity Data</b>	3 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Other - Reference Contact Data</b>	3 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Other - Military Service Status</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Other - Signature</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Other - Work Permit Certificate</b>	15 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period
<b>Risk Management</b>	3 years from the Termination of the Legal Relationship	At the first periodic disposal following the end of the storage period

**Biometric Data**2 years from the Termination of the  
Legal RelationshipAt the first periodic disposal  
following the end of the storage  
period

## 10. UPDATE AND COMPLIANCE

The Company reserves the right to make changes in this Personal Data Storage and Disposal Policy due to amendments to the Law, in accordance with the decisions of the Authority or in line with the developments in the sector.