

AKSER LED VE ELEKTRONİK SAN. VE TIC.A.S.
PERSONAL DATA STORAGE AND DESTRUCTION POLICY

1. INTRODUCTION

1.1. Purpose

This **Personal Data Storage and Destruction Policy** (hereinafter referred to “**Policy**”) applies completely to **AKSER LED VE ELEKTRONİK SAN. VE TIC.A.S.** (hereinafter referred to “**Company**”) in accordance with the applicable legislation and is based on the nationally accepted basic principles on personal data destruction. It contains the frameworks and principles on the necessary destruction works under the relevant legislation.

The provision that "the procedures and principles on deletion, destruction or anonymization of personal data are arranged in the regulation" is specified in Article 7, paragraph three of the Personal Data Protection Law (herein after referred to "**Law**"). Pursuant to this provision and Article 22, paragraph one, sub-clause (e) of the Law, the Regulation on Deletion, Destruction or Anonymization of Personal Data (hereinafter referred to “**Regulation**”) is prepared by the Personal Data Protection Board (hereinafter referred to “**Board**”) and published in the copy dated of 28.10.2017 and numbered 30224 of the Official Gazette.

Based on the above arrangement, the purpose of this Policy is to determine the procedures and principles on deletion, destruction or anonymization of personal data processed in performance of the activities of the Company in accordance with the Regulation.

1.2. Scope

The personal data pertaining the employees, employee candidates, visitors and the third persons, with whom our company has a legal relationship, and the third persons in cooperation with our company and the employees of such third persons is in the scope of this Policy, and this Policy applies to all recording media, where personal data owned or managed by the Company are processed, and to the activities related to personal data processing.

1.3. Abbreviations and Definitions

Term	Definition
Receipt Group	The category of natural or legal persons, to whom personal data is transferred by the data controller.
Express Consent	A consent on a specific subject based on information and expressed with a free will.
Anonymization	Making the personal data unrelated to an identified or identifiable real person in any way even by matching other data.
Electronic Media	Media, where the personal data can be created, read, changed and written

	by using the electronic devices.
Non-Electronic Media	All written, printed, visual and other media other than electronic media.
Related person	A real person, whose personal data is processed.
Related user	The persons, who process the personal data in the organization of the data controller or in accordance with the authority and instructions received by the data controller except the person or department responsible for technical storage, protection and backup of the data.
Destruction	Deletion, destruction or anonymization of the personal data.
Law	Personal Data Protection Law No.6698.
Recording media	Any medium containing the personal data that is or processed fully or partially automatically or in any non-automatic ways, provided that it is a part of any data recording system.
Personal data	Any information about any identified or identifiable real person.
Personal data owner	A real person, whose personal data is processed.
Processing of personal data	Any operations performed on the data such as obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, taking over, making available, classifying or preventing use of the personal data that is or processed fully or partially automatically or in any non-automatic ways, provided that it is a part of any data recording system.
Personal data processing inventory	An inventory, in which the data controllers describe and detail the personal data processing activities performed depending on the business processes, personal data processing purposes, data category, the recipient group transferred, and the maximum period of time required for the purposes, for which the personal data are processed, the personal data foreseen to be transferred to foreign countries, and the measures taken for data security.
Board	Personal Data Protection Board.
Authority	Personal Data Protection Authority.
Proprietary personal data	Any data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures of the individuals, and any biometric and genetic data.
Periodic destruction	Any deletion, destruction or anonymization operations specified in the personal data storage and destruction policy and to be performed directly at the recurring intervals, if all the conditions for processing the personal data specified in the law are eliminated.
Policy	The policy considered data controllers for the process of determining the maximum time required for the purpose of processing the personal data, and for deletion, destruction and anonymization.

Registration	Registration of the data controllers kept by the Personal Data Protection Authority
Data processor	A real or judicial entity, who processes personal data on behalf of the data controller based on the authority given by the data controller.
Data recording system	A recording system, in which the personal data is configured and processed according to any particular criteria.
Data controller	A real or judicial entity, who determines the purposes and means of processing the personal data and is responsible for establishment and management of the data recording system.
Regulation	Regulation on Deletion, Destruction or Anonymization of the Personal Data published and promulgated in the copy dated of 28.10.2017 and number 30224 of the Official Gazette.

2. RESPONSIBILITY and DISTRIBUTION OF DUTIES

All departments and employees of the company support the responsible departments actively to take any technical and administrative measures for purposes of implementing the technical and administrative measures taken by the responsible departments under the Policy as required, increasing training and awareness of the department employees, monitoring and inspecting them permanently, preventing the personal data from being processed illegally, preventing the personal data from being accessed illegally, ensuring that the personal data is stored legally, and ensuring the data security in all media, in which the personal data is processed.

Titles, departments and task descriptions of the persons in charge during the personal data storage and destruction processes are given below:

Table 1: Task distributions during the storage and destruction processes

Title	Department	Task description
Data Processing Officer	Data Processing	Ensuring the compliance of the processes included in the task with the storage period, managing the periodic destruction process, and performing the necessary audits and controls to respond to the requests of the Data Owners.
Accounting Department Manager	Accounting	Ensuring the compliance of the processes included in the task with the storage period, managing the periodic destruction process, and checking whether the book and document keeping obligations under the Turkish Trade Law

		No.6100 and Tax Law are maintained and eliminated or not.
Human Resources Manager	Human Resources	Ensuring the compliance of the processes included in the personal data of the employees with the storage period, managing the periodic destruction process, and receiving and responding to the requests of the employees to be informed about their rights specified in the Law.

3. RECORDING MEDIA

The personal data are stored securely by the Authority in the media listed in Table 2 in accordance with the Law.

Table 2: Personal data storage media

Electronic Media	Non-Electronic Media
<ul style="list-style-type: none"> • Servers (Domain, backup, e-mail, database, web, file sharing, etc.) • Software (office software) and information security devices (firewall, log file, antivirus, etc.) • Mobile devices (phone, tablet, etc.) • Optical discs (CD, DVD, etc.) • Removable sticks (USB, Memory Card etc.) • Printer, scanner, copier • Removable flash drives such as USB, hard disk, etc. • Desktop and laptop PCs 	<ul style="list-style-type: none"> • Paper • Manual data recording systems • Written, printed and visual media • Folders • Files

4. INFORMATION ABOUT DATA STORAGE AND DESTRUCTION

The personal data of the real persons including employees, employee candidates, trainees, trainees' relatives, suppliers, supplier's representatives, supplier's employees, product or service purchasers, representatives/employee of product or service purchasers, potential product or service purchasers, shareholders/partners, visitors, etc. is stored and destructed by the Company in accordance with the Personal Data Protection Law.

In this context, the detailed information about data storage and destruction is given below respectively:

4.1. Information About Data Storage

The concept “personal data storage” is defined in Article 3 of the Law, and in Article 4 of the Law, it is stated that the personal data must be related, limited and reasonable to the purpose for which they are processed, and must be kept for the period stipulated in the relevant legislation or for the purpose for which they are processed, and the conditions on processing of the personal data are listed in Articles 5 and 6 of the Law.

Accordingly, the personal data is stored in line with the Company’s business activities for a period stipulated in the relevant legislation or in accordance with our processing purposes.

4.1.1. Legal Reasons Requiring Data Storage

The **Company** keeps the personal data processed in line with its business activities for the period stipulated in the relevant legislation. In this context, the personal data is stored for the storage periods in the legislations and especially in

- Tax Procedure Law No.213;
- Identity Reporting Law No.1774;
- Labor Law No. 4857;
- Social Security and General Health Insurance Law No.5510;
- Law No.5651 on Regulating the Online Broadcasts and Combating the Crimes Committed Through These Broadcasts;
- Turkish Law of Obligations No.6098;
- Turkish Trade Law No.6102;
- Occupational Health and Safety Law No.6361; and
- Personal Data Protection Law No.6698.

4.1.2. Processing Purposes Requiring Data Storage

The company stores the personal data processed in line with its business activities and for the following purposes:

- To perform the emergency management processes;
- To carry out the information security processes;
- To perform the employee candidate / trainee / student selection and placement processes;
- To carry out the application processes of the working candidates;
- To perform the obligations under the employment contracts and legislations for the employees;
- To conduct the processes for the fringe benefits and benefits of the employees;
- To conduct the Audit / Ethical Activities;
- To carry out the training activities;
- To execute the access authorizations;
- To carry out any activities in accordance with the legislation;
- To conduct the finance and accounting affairs;

- To provide security of the physical spaces;
- To carry out the assignment processes;
- To follow up and perform the legal affairs;
- To conduct the internal audit / investigation / intelligence activities;
- To conduct the communication activities;
- To carry out the human resources processes;
- To perform/inspect the Business Activities;
- To carry out the occupational health/safety activities;
- To carry out the activities to ensure business sustainability;
- To conduct the logistics activities;
- To perform the goods/service production and operation processes;
- To carry out the goods/service procurement processes;
- To conduct the goods/service sales processes;
- To carry out any activities for customer satisfaction;
- To perform the organization and event management;
- To conduct the performance evaluation processes;
- To carry out the risk management processes;
- To execute the contract processes;
- To provide the security of the real properties and resources;
- To perform the supply chain management processes;
- To manage the compensation policy;
- To carry out the marketing processes of the products/services;
- To provide the security of the data controller operations;
- To carry out the work and residence permit procedures of the foreign employees;
- To keep the authorized persons, institutions and organizations informed; and
- To carry out the management activities.

4.2. Reasons Requiring Data Destruction

The personal data is deleted, destructed or anonymized by the Company directly or upon the request of the related person in the following circumstances:

- In case that the provisions of the relevant legislation that form the basis of the data processing are changed or canceled;
- If the purpose requiring the data processing or storage is no longer available,
- If the related person withdraws his/her express consent, where the personal data is processed only upon the express consent;
- In case that the application for deletion and destruction of the personal data within the framework of the rights of the data owner is accepted pursuant to Article 11 of the Personal Data Protection Law;

- If the Company refuses the application made by the related person to delete or destruct the personal data, finds the given response insufficient or fails to respond within period specified in the Personal Data Protection Law, makes a complaint to the Board and this request is found suitable by the Board; and
- In case that the maximum period requiring storage of the personal data has passed over and there are no conditions to justify storage of the personal data for a longer period of time.

5. TECHNICAL AND ADMINISTRATIVE MEASURES

The technical and administrative measures are taken by the Company to store the personal data, to prevent it from being processed and accessed illegally, and to destruct the personal data legally in accordance with the sufficient actions determined and announced by the Board for any proprietary personal data pursuant to Article 12 and Article 6, clause 6 of the Personal Data Protection Law.

5.1. Technical Measures

The measures taken by the Company for the personal data processed by it are as follows:

- The network security and application security are provided.
- The key management is implemented.
- The security measures are taken for procurement, development and maintenance of the information technology systems.
- The security of personal data stored in the cloud is provided.
- The access logs are kept regularly.
- The data masking measures are implemented, when necessary.
- Powers of the employees, who have a job change or leave their job, are cancelled in this field.
- The current anti-virus systems are used.
- The firewalls are used.
- The personal data are backed up and the security of such backed up personal data is also provided.
- The Log records are kept without any user intervention.
- The intrusion detection and prevention systems are used.
- The cyber security measures are taken and their application is monitored permanently.
- Encryption is done.
- The data loss prevention software is used.

5.2. Administrative measures

The measures taken by the Company for the personal data processed by it are as follows:

- The confidentiality commitments are made.
- Any Necessary security measures are taken for entering and exiting any physical media containing the personal data.
- The physical media containing the personal data are secured against external risks (fire, flood, etc.).

- Security of the media containing the personal data is ensured.
- The personal data is reduced as much as possible.

6. PERSONAL DATA DESTRUCTION TECHNIQUES

At the end of the period specified in the relevant legislation or the storage period required for the purpose, for which they are processed, the personal data are destroyed by the Company by using the following techniques directly or upon application of the relevant person and again in accordance with the provisions of the relevant legislation.

6.1. Deletion of the Personal Data

The personal data are deleted by the methods given in Table-3.

Table 3: Deletion of the personal data

Data Recording Media	Description
Personal data in the physical media	The personal data in the physical media are deleted by using the method or by storing the document in a secure medium that will not be accessed by the relevant users in any way.
Personal data in the servers	The access authorization of the related users is removed by the system administrator for the personal data contained in the servers, the storage period of which expires, and the deletion operation is conducted for such personal data.
Personal data in the databases	The related user is prevented from being accessed to the personal data contained in the databases by making the task and authorization assignment.
Personal data in the mobile devices (USBs, Hard disks, CDs, DVDs, etc.)	The related user is prevented from being accessed to the file.

6.2. Destruction of the Personal Data

The methods used by us as the company for purpose of implementing the destruction operation of the personal data personally are as follows:

Table 4: Destruction of the Personal Data

Data Recording Media	Description
Personal data in the physical media	The personal data contained in the hardcopy environment, the storage period of which expires, is destroyed irreversibly in paper trimming machines.
Personal data in the perimeter (network devices, flash-based media, optical systems, etc.) and	The devices containing the personal data are destroyed by the physical processes such as

local systems	incineration, fragmentation, and melting. Furthermore, the personal data in the device are made unreadable by the demagnetization method, and the destruction process is performed. However, As a result of entering the random data entry on the existing data by the special software, recovery of old data is prevented and the destruction process is applied.
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6.3. Anonymization of the Personal Data

Anonymization of the personal data means that such data may be made unrelated to an identified or identifiable real person, even if it is matched with other data.

In order for personal data to be anonymized, it must be made unrelated to a real identified or identifiable person, even by using appropriate techniques in terms of the recording medium and the relevant field of activity such as the return of personal data by the data controller or third parties and/or matching the data with other data.

7. STORAGE VE DESTRUCTION PERIODS

For the personal data processed by the Company inline to its business activities;

- The storage periods based on the personal data related to all personal data within the scope of activities performed in connection with processes are included in the Personal Data Processing Inventory;
- The storage periods based on the data categories are included in VERBIS; and
- The process-based storage periods are included in this Personal Data Storage and Destruction Policy.

The personal data destruction process is conducted in accordance with the retention periods determined by the Company under the legislation and with each relationship. The personal data, the storage period of which expires, is deleted, destroyed or anonymized within the periodic destruction periods determined by the Company.

Table 5: Table of Process Based Storage and Destruction Periods

Process	SAKLAMA SÜRESİ	İMHA SÜRESİ
Performance of the processes for the employees of the Human Resources department	15 years after the employee leaves the job	It is destroyed within the periodic destruction period of first 6 month from the end of the storage period.
Performance of the processes for the trainees	10 years from completion of the training	It is destroyed within the periodic destruction period of

		first 6 month from the end of the storage period.
Performance of the processes for the employee candidates	1 year after the application is not accepted	It is destructed within the periodic destruction period of first 6 month from the end of the storage period.
Performance of the processes for the trainee candidates	1 year after the application is not accepted	It is destructed within the periodic destruction period of first 6 month from the end of the storage period.
Performance of the contractual relationships	10 years from expiration of the contract	It is destructed within the periodic destruction period of first 6 month from the end of the storage period.
Camera Records	30 days from recording	It is destructed automatically at the end of the record time.
Performance of the Accounting and Finance Processes	30 years from recording	It is destructed within the periodic destruction period of first 6 month from the end of the storage period.

The direct deletion, destruction and anonymization operations for the personal data, the storage period of which expires, are conducted by the departments specified under the title “2. RESPONSIBILITY and DISTRIBUTION OF DUTIES.”

8. PERIODIC DESTRUCTION PERIOD

Pursuant to Article 11 of the Regulation, it is determined by the Company that the periodic destruction period is six [6] months. Accordingly, The Company carries out the periodic destruction operation in June and December of every year.

9. PUBLICATION AND MAINTENANCE OF THE POLICY

The policy is published in two different media as wet signed (printed paper) and electronically, and disclosed to the public on the website. The printed paper copy is also kept in the file in the Human Resources Department.

10. UPDATING PERIOD OF THE POLICY

The policy is updated as needed and when changing processes are available.

11. EFFECTIVENESS AND ABROGATION OF THE POLICY

This Policy is deemed to have entered into force after it is published at the company's website.

If it is decided that the policy be repealed, the old copies of the Policy with wet signature are canceled and signed by the signature of the company officer and the company stamp signed (by attaching the seal "cancelled" or entering the phrase "cancelled") and kept by the Human Resources Department for at least 5 years.