



DATA STORAGE, DESTRUCTION AND ANONYMIZATION POLICY

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1 AIM AND SCOPE

This document is prepared to fulfill our obligations as AKGUN Computer Program and Services Industry Trade Incorporated Company ("AKGUN A.Ş.") in our capacity as the data officer as per the Law on the Protection of Personal Data No.6698 ("PDPL" or "Law") and Regulation on the Deletion, Destruction or Anonymization of Personal Data ("Regulation") taking effect upon being published in the Official Gazette dated October 28, 2017, which is the secondary regulation of the law, and to inform the data owners about the principles of identifying the maximum duration of data storage required for the purpose of personal data processing and processes of deletion, destruction and anonymization of data. This policy includes the employees of AKGUN A.Ş., our active and potential customers, visitors and other real persons in relation with AKGUN A.Ş

2 DEFINITIONS AND ABBREVIATIONS

Definitions / Abbreviations	
Explicit Consent	Consent related to a particular subject, which is based on information and explained by free will.
Relevant User	Persons, who process personal data within the organization of the data officer or in accordance with the authority and instructions received from the data officer, except for the person or unit responsible for the technical storage, protection and backup of the data.
Destruction	Personal data deletion, destruction or anonymization.
Law/PDPL	Law/PDPL Law on the Protection of Personal Data No.6698
Recording Media	Any environment, in which personal data is processed by non-automatic means, whether fully or partially automated or as part of any data recording system.
Personal Data	All kinds of information about identified or identifiable real person.
Processing of Personal Data	All kinds of operations performed on the data such as acquiring, recording, storage, preservation, alteration, rearrangement, disclosure, transfer, acquisition, rendering available, classification or prevention of use of personal data by non-automatic means, whether fully or partially automated or as part of any data recording system.
Anonymization of Personal Data	Making personal data not to be associated with an identified or identifiable real person under any circumstances, even by matching it with other data.

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Deletion of Personal Data	Deletion of personal data; making personal data inaccessible and unusable in any way for the respective users.
Destruction of Personal Data	The process of making personal data inaccessible, irrevocable and reusable by anyone in any way.
Board	Personal Data Protection Board.
Sensitive Personal Data	Data on race or ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, association, foundation or trade union membership, health, sexual life, criminal convictions and security measures and biometric and genetic data of the persons.
Periodic Destruction	In the event that all requirements of processing of personal data contained in the law are eliminated, the process of deleting, destroying or anonymizing the personal data to be directly performed at the intervals specified in the storage and destruction policy.
Data Owner / Contact Person	A real person, whose personal data is processed.
Data Officer	Real person or legal person determining the purpose and means of personal data processing, responsible for the establishment and management of data recording system.
Regulation	Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.

3 RELATED DOCUMENTS

Law on the Protection of Personal Data No.6698
Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.
AKGUN A.Ş. Clarification Text
AKGUN A.Ş. Data Owner Application Form
AKGUN A.Ş. Personal Data Protection Policy
AKGUN A.Ş. Cookie Policy
AKGUN A.Ş. Confidentiality Policy
AKGUN A.Ş. Consent Statement
AKGUN A.Ş. Personal Data Processing Inventory

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4 ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Chairman of the Board of Directors/ General Manager/Assistant General Managers	Responsible for ensuring that employees act in accordance with the policy.
PDP Committee	Responsible for preparing, developing, executing, publishing and updating the policy in relevant media.
PDP Committee - Quality and Method Development Coordinator	
PDP Committee - Technical Services Manager	Responsible for providing the technical solutions needed in the implementation of the policy.
PDP Committee - Administrative and Financial Affairs Coordinator - Human Resources Manager	Responsible for the execution of the policy in accordance with his/her duties.

5 IMPLEMENTATION

5.1 PRINCIPLES

The storage and destruction of personal data is carried out by AKGUN A.Ş. subject to the following principles:

1. Principles listed in Article 4 of the Law and technical and administrative measures specified in Article 12 of the Law and Article 6.2 of this policy, provisions of the relevant legislation, Board decisions and this Policy are observed fully in the deletion, destruction and anonymization of personal data.
2. All operations related to deletion, destruction, anonymization of personal data **are registered by AKGUN A.Ş. and these records are stored for minimum 3 years, excluding other legal obligations.**
3. Unless a decision is taken by the board to the contrary, the appropriate method of directly deleting, destroying or anonymizing personal data is chosen by us. However,

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at the request of the person concerned, the appropriate method will be selected by explaining the reason.

4. If all conditions for processing personal data contained in the Articles 5 and 5 of the Law are eliminated, personal data shall be deleted, destroyed or anonymized directly by AKGUN A.Ş. or at the request of the person concerned. In this regard, if the person concerned applies to AKGUN A.Ş.;
 - a. The requests submitted are finalized no later than 30 (thirty) days and information is provided to the person concerned,
 - b. If the data subject to the request has been transferred to third parties, this is notified to the third party, to which the data has been transferred, and it is ensured that necessary actions are taken by third parties.

5.2 EXPLANATIONS ON REASONS REQUIRING STORAGE AND DISPOSAL

Personal data of data owners, are stored within limits specified in the PDPL and other relevant legislation in a safe manner in the abovementioned physical or electronic environments especially for the sustainability of commercial activities, fulfillment of legal obligations and planning and exercise of employee rights and benefits and managing customer relations.

Reasons for storage are as follows:

1. Storage of personal data because it is directly related to the establishment and execution of contracts,
2. Storage of personal data for the purpose of establishing, using or protecting a right,
3. Provided that personal data does not harm the fundamental rights and freedoms of persons, storage is mandatory for the legitimate interests of AKGUN A.Ş.,
4. Storage of personal data for the purpose of fulfilling of any legal obligation by AKGUN A.Ş.,
5. Clear statement of storage of personal data in legislation,
6. Explicit consent of the data owners in terms of storage activities that require the explicit consent of the data owners.

In accordance with the regulation, personal data belonging to data owners are deleted, destroyed or anonymized directly by AKGUN A.Ş. or upon request:

1. Amendment or repeal of the provisions of the relevant legislation that are the basis for the processing or storage of personal data,
2. Elimination of the purpose requiring processing or storage of personal data,
3. Elimination of the conditions in Articles 5 and 6 of the Law requiring processing of personal data,
4. In cases where processing of personal data occurs only in accordance with the condition of express consent, withdrawal of the consent by the person concerned,

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5. Acceptance of the application by the person concerned for the deletion, destruction or anonymization of personal data within the framework of the rights in sub-paragraphs 2(e) and (f) of the Article 11 of the Law, by the data officer,
6. If the data officer rejects an application submitted by the person concerned with a request to delete, destroy or anonymize his/her personal data and his/her response is found insufficient or s/he does not respond within the time stipulated in the law; a complaint is filed with the Board and this request is deemed appropriate by the Board,
7. Although the maximum time required to store personal data has passed, there are no conditions that justify storing personal data for a longer period of time,

5.3 STORAGE AND DESTRUCTION DURATIONS

In determining the storage and destruction durations of your personal data obtained by AKGUN A.Ş. in accordance with the provisions of the PDPL and other relevant legislation, the criteria specified below are used, respectively:

1. If the legislation provides for a period of time for the storage of such personal data, this period is observed. After the expiration of the specified period, action is taken on the data within the scope of sub-paragraph 2.
2. If the period stipulated in the legislation for the storage of such personal data expires or if the relevant legislation does not provide for any period of time for the storage of such data, respectively;
 - a. Based on the definition in Article 6 of the PDPL, personal data is classified as personal data and sensitive personal data. All personal data determined to as sensitive data shall be destroyed. The method to be applied in the destruction of the data in question is determined by the degree of importance of nature and storage of data at AKGUN A.Ş.
 - b. For example, for the compliance of data storage to the principles in Article 4 of the PDPL, it is questioned whether AKGUN A.Ş. has a legitimate reason for data storage. Data, storage of which is found to be contrary to the principles in Article 4 of the PDPL, is deleted, destroyed or anonymized.
 - c. It is determined which exceptions provided for in the Articles 5 and 6 of the PDPL can be applied to the data storage. Reasonable durations are determined for the storage of data within the framework of the exceptions identified. If these periods expire, the data will be deleted, destroyed or anonymized.

The storage, destruction and periodic destruction periods determined by AKGUN A.Ş. can be found in the **"Personal Data Processing Inventory"** included in the annex to this policy.

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Personal data that has expired will be destroyed in accordance with the procedures set out in this policy at intervals of **6-month period** within the framework of the destruction periods set out in the annex to this policy.

All operations related to deletion, destruction, anonymization of personal data are registered and these records are stored for ***minimum three years***, excluding other legal obligations.

5.4 PROCEDURES OF STORAGE AND DESTRUCTION OF PERSONAL DATA BY AKGUN A.Ş.

5.4.1 RECORDING MEDIA

Personal data of data owners is stored by AKGUN A.Ş. securely in accordance with the relevant legislation, especially the provisions of the PDPL and international data security principles.

Electronic media:

- Servers (domain, backup),
- e-mail, database, web, file sharing, etc.
- Software (office software, portal, EBYS, VERBIS).
- Information security devices (firewall, intrusion detection and blocking, log file, antivirus, etc.)
- Personal computers (desktop, laptop)
- Mobile devices (phone, tablet, etc.)
- Optical discs (CD, DVD, etc.)
- Portable memory (USB, memory card, etc.)
- Printer, scanner, copier.

Physical environments:

- Manual data recording systems (survey forms, visitor log book)
- Written, printed, visual media
- Unit cabinets/ARCHIVE

5.4.2 TECHNICAL AND ADMINISTRATIVE MEASURES

For the purposes of secure storage of your personal data, unlawful processing, prevention of access and destruction of data in accordance with the law, all administrative and technical measures taken by AKGUN A.Ş. within the framework of the Article 12 of the PDPL are listed below:

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Administrative Measures:

- AKGUN A.Ş. conducts the necessary audits and have these conducted to ensure the implementation of the provisions of the Law in its own institution or organization.
- If the personal data processed is obtained by others by illegal means, AKGUN A.Ş. shall notify the person concerned and the Board as soon as possible.
- As for the sharing of personal data, AKGUN A.Ş. signs a framework agreement with the persons, with whom personal data is shared, or provides data security with the provisions to be added into the contracts.
- AKGUN A.Ş. employs personnel knowledgeable and experienced about the processing of personal data and provides its personnel with the necessary PDP training.

Technical Measures:

- To ensure data security, AKGUN A.Ş. employs knowledgeable and experienced persons and provides the personnel with the necessary PDP training.
- AKGUN A.Ş. has established and implements TS ISO/IEC 27001 Information Security Management System and technical measures and conducts necessary internal controls in this context.
- It carries out risk analysis, data classification, IT risk assessment and business impact analysis within the established systems.
- It ensures the provision of technical infrastructure and creation of relevant matrices that will prevent and/or monitor the leakage of personal data outside the institution.
- It ensures that access of the employees working at the information technology units are under the control of the officers.

5.4.3 INTERNAL AUDIT

In accordance with the Article 12 of the Law, AKGUN A.Ş. regularly conducts internal audits of the implementation of the provisions of the Law and the provisions of this Personal Data Storage and Destruction Policy and Personal Data Protection and Processing Policy.

If, as a result of internal audits, deficiencies or defects related to the implementation of these provisions are identified, these deficiencies or defects will be remedied as soon as possible. If it is understood that the personal data under the responsibility of AKGUN A.Ş. is obtained by others by illegal means, AKGUN A.Ş. shall notify the person concerned and the PDP Board as soon as possible (within 72 hours).

5.4.4 PERSONNEL

Personnel taking part in the process of storage and destruction of personal data within the company shall include one employee from Human Resources Department, one employee from Administrative Affairs Department, one employee from IT Department and destruction

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minutes kept by the personnel and changes in the storage procedure shall be informed to the General Manager's Office and Legal Department.

5.4.5 PROCEDURES FOR DELETING, DESTROYING AND ANONYMIZING PERSONAL DATA

Personal data obtained by AKGUN A.Ş. in accordance with the PDPL and other relevant legislation shall be destroyed directly by AKGUN A.Ş. or upon the application of the person concerned by means of the following methods in accordance with the provisions of the law and the relevant legislation if the purpose of data processing specified in the Law and Regulation is no longer available.

a. Methods for Deleting and Destroying Personal Data:

Procedures and principles related to the methods of deletion and destruction of personal data by AKGUN A.Ş. are listed below:

Deletion of Personal Data:

Secure Deletion from Software: when deleting data processed by fully or partially automated means and stored in digital media, methods are used to delete data from the relevant software in such a way that it is in no way accessible and reusable for the relevant users.

Deleting relevant data in the cloud system with a delete command; removing the access rights of the relevant user on the file or directory, where the file is located on the central server; deleting relevant rows in databases using database commands; or deleting data contained in portable media, i.e. flash memory, using appropriate software, can be considered in this context.

However, if deletion of personal data results in the inability to access and use other data within the system, the personal data will also be considered deleted if the personal data is archived, making it unable to be associated with the person concerned, provided that the following conditions are met.

- Restricting access by any other institution, organization or person,
- Taking all necessary technical and administrative measures to ensure that personal data is accessed only by authorized persons.

Secure Deletion by an Expert: In some cases, an agreement can be concluded with an expert to delete personal data on his or her behalf. In this case, personal data is securely deleted by a person, who is an expert in this regard, in such a way that it is in no way accessible to the relevant users and is made unusable again.

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Destruction of Personal Data in Paper Media: To prevent non-purposeful use of personal data or to delete the requested data, the related personal data is physically cut out of the document or made invisible using fixed ink, which cannot be recycled and read with technological solutions.

Destruction of Personal Data:

De-magnetization: a method of unreadable data degradation by passing magnetic media through special devices, where it will be exposed to high magnetic fields. It should be noted that if destruction by this method is not successful, the destruction process be completed only by physical destruction of the media.

Physical Destruction: Personal data can also be processed by non-automatic means, provided that it is part of any data recording system. When destroying such data, a system of physical destruction of personal data is implemented in such a way that it cannot be used later. Destruction of data in paper and microfiche media shall also be carried out in this way, since they cannot be destroyed in any other way.

Overwriting: Overwriting is a method of data destruction that makes it impossible to read and recover old data by writing random data consisting of 0 and 1s minimum seven times over magnetic media and rewritable optical media using special software.

During the abovementioned circumstances; AKGUN A.Ş. fully complies with the provisions of the PDPL, Regulation and other relevant legislation to ensure data security and takes all necessary administrative and technical measures.

b. Methods of Anonymizing Personal Data:

Procedures and principles related to the methods of anonymization of personal data by AKGUN A.Ş. are listed below:

Methods of Anonymization Not Providing Value Irregularity

Anonymous methods not providing value irregularity are methods of anonymization that are applied by generalizing, relocating or removing a specific group of data or sub-data from a group, without changing or adding/subtracting the personal data being stored.

Variable Extraction: “High-degree descriptive” ones are extracted from the variables in the dataset created after the data collected by the method of extracting descriptive data, making the existing data set anonymous.

Extracting Records: In the method of extracting from the record, the data row containing a singularity between the data is extracted from the records and the stored data is

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anonymized. For example, if a company has one senior manager, the data belonging to that person will be extracted from the records, where the seniority, salary and gender data of employees at the same level is kept, and the remaining data will be anonymized.

Regional Suppression: In the regional suppression method, suppression of the relevant data provides anonymization if a single data has a determinative nature due to the fact that it creates a merely visible combination. For example, if only one person among the relevant data managers on the substitute list of the company's football team is 65 years old, typing 'Unknown' instead of 'Age:65' or leaving this section blank will provide anonymization in a dataset that also stores information about whether they can play football in terms of age, gender and health.

Lower and Upper Limit Encoding: Lower and upper limit encoding method is anonymized by combining values in a data group with predefined categories by determining a specific criterion. For example, the year of the personnel at the workplace can be anonymized by combining the data as (very experienced), (experienced) or (inexperienced) according to the years spent at the workplace being less than 5 years, 5 to 10 years or more than 10 years:

Generalization: With the data aggregation method, data is aggregated and personal data is made disassociated with any person. For example, showing that there are as many employees as Z at the age of X without showing the age of the employees individually.

Global Encoding: Data derivation creates a more general content than the content of personal data, making personal data disassociated with any person. For example, specifying ages instead of dates of birth; specifying the region of residence instead of an open address.

Methods of Anonymization Providing Value Irregularity

In anonymizing methods that provide value irregularity, unlike those that do not provide value irregularity, it creates distortion by changing some data in personal data groups. Deviations in accordance with the expected/desired benefit will need to be applied carefully when using these methods. By ensuring that the total statistics are not distorted, one can continue to achieve the expected benefit from the data.

Adding Noise: Method of adding noise to data is adding a number of deviations in plus and minus directions to the existing data at the specified rate, especially in a data set, where numerical data is weighted, making the data anonymous. For example, in a data group with weight values, using the (+/-) 3 kg deviation, the actual values are prevented from being displayed and the data is anonymized. The deviation is applied equally to each value.

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Micro Merger: In the micro merger method, all data will first be divided into groups in a meaningful order (such as large to small), and the value obtained by averaging the groups will be written instead of relevant data in the existing group, providing anonymization.

For example, for salary information, if two groups of below and above 10,000, the sum of the salaries of people, who receive salaries of 10,000 and less, is divided by the number of people, and this value obtained is written into the salary set of everyone, who receives a salary of less than 10,000.

Data Exchange: In the data exchange method, values of the variable between the pairs selected among the data stored are exchanged with one another. In this method, which is used for data that can be categorized in general, the goal is to transform the database by exchanging the data of the data owners with each other.

For example, income information for people with data 'Age: 45', 'Gender: Female', 'Province: Ankara', 'Age: 30', 'Gender: Female', 'Province: Izmir' and 'Age: 25', 'Gender: Male', 'Province: Izmir', and income information for those with data 'Age: 35', 'Gender: Male', 'Province: Istanbul' were changed within each other and the database was transformed.

As per the Article 28 of the PDPL, if personal data is processed for purposes such as research, planning and statistics by anonymizing with official statistics, this will be outside the scope of the law and explicit consent will not be required.

6 UPDATE AND COMPLIANCE

Due to changes in the law, AKGUN A.Ş. reserves the right to make changes to the Personal Data Processing and Protection Policy or to this Personal Data Storage and Destruction Policy in accordance with the decisions of the Institution or developments in its sector or in the field of Information Technology.

This policy prepared by AKGUN A.Ş. entered into force on 01.12.2021.

In the event of a change in the policy, the effective date of the policy and related articles will be updated accordingly.