



PERSONAL DATA STORAGE and DISPOSAL POLICY

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PERSONAL DATA STORAGE and DISPOSAL POLICY

The protection of personal data is of great importance for QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi (hereinafter referred to as the "Company") and our Company shows maximum sensitivity in this regard. In this direction, the processing of personal data in a manner consistent with the expectations of individuals and in accordance with the law is one of the basic building blocks of our Company.

In this respect, our Company stores and disposes of the personal data obtained during its activities in accordance with the general principles and regulations specified in this Personal Data Storage and Disposal Policy (hereinafter referred to as the "Policy") prepared in accordance with the Constitution, the Personal Data Protection Law No. 6698 (hereinafter referred to as "KVKK" and/or "Law"), the Regulation on Deletion, Destruction or Anonymization of Personal Data (hereinafter referred to as the "Regulation") and other relevant legislation.

1. Purpose

With this Policy, the Company aims to fulfill the obligations determined by the legislation regarding these issues, including the general policies and principles of the Company regarding the storage and disposal of natural person data subject to personal data processing activities within the scope of KVKK.

2. Scope

This Policy covers all personal data subject to the Company's data processing activities within the scope of KVKK. In addition, unless otherwise stated in this Policy, the documents referred to by the Policy include both physical and digital copies.

3. Definitions

- "Explicit Consent"** Consent on a specific issue, based on information and freely given,
- "Recipient Group"** The category of natural or legal person to whom personal data is transferred by the data controller,
- "Constitution"** Constitution of the Republic of Turkey,
- "Related User"** Persons who process personal data within the organization of the data controller or in accordance with the authorization and



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instruction received from the data controller, except for the person or unit responsible for the technical storage, protection and backup of the data,

“Disposal” Deletion, destruction or anonymization of personal data,

“Recording Environment” Any medium containing personal data that is fully or partially automated or processed by non-automated means, provided that it is part of any data recording system,

“Personal Data” Any information relating to an identified or identifiable natural person (e.g. name-surname, Turkish ID Number, e-mail, address, date of birth, credit card number, bank account number - Therefore, the processing of information relating to legal entities is not covered by the KVKK),

“Related Person” The natural person whose personal data is processed,

“Processing of Personal Data” Any operation performed on personal data such as obtaining, recording, storing, preserving, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system,

“Board” Personal Data Protection Board,

“Sensitive Personal Data” Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data,



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“Periodic Disposal” In the event that all of the conditions for the processing of personal data in the KVKK disappear, the deletion, destruction or anonymization process specified in this Policy and to be carried out ex officio at recurring intervals,

“Data Controller” The person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data recording system),

4. RECORDING ENVIRONMENTS REGULATED BY POLICY

The Company stores all personal data subject to data processing activities within the scope of KVKK in the following environments where personal data processed by fully or partially automated or non-automated means, provided that they are part of any data recording system:

ELECTRONIC ENVIRONMENTS:

- Micro Accounting/Payroll
- File Server
- DC
- Micros POS

PHYSICAL ENVIRONMENTS:

- Department Cabinets
- Archive (Within the company and through service procurement)

Our Company databases, third-party databases, email accounts, desktop computers, Company employees' vehicles (e.g. cell phones), backup areas, paper files, etc.

5. REASONS FOR STORAGE AND DISPOSAL OF PERSONAL DATA

The following principles are taken as basis by the Company during the performance of personal data processing activities:

- Compliance with the law and good faith,



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- Ensuring that personal data is accurate and, where necessary, up to date,
- Processing for specific, explicit and legitimate purposes,
- Being relevant, limited and proportionate to the purpose for which they are processed,
- Storing for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

The Company stores and uses personal data in accordance with the above-mentioned principles for the purposes of personal data processing in the relevant articles of the QVV Mühendislik Sanayi Ve Ticaret Ltd Şti Personal Data Protection and Processing Policy and in accordance with the conditions for processing personal data in Articles 5 and 6 of the KVKK specified below, and destroys personal data ex officio or upon the request of the personal data subject in the event that all of these conditions disappear.

Pursuant to Articles 5 and 6 of the KVKK, personal data are processed and stored in the following cases:

(a) Presence of Explicit Consent of the Personal Data Subject

The first condition for processing personal data is the explicit consent of the subject. The explicit consent of the personal data subject must be related to a specific matter, based on information and free will.

(b) Explicitly Provided for in Law

The personal data of the data subject may be processed in accordance with the law without obtaining his/her explicit consent, if expressly provided for in the Laws.

(c) Failure to Obtain Explicit Consent of the Personal Data Subject Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect the life or physical integrity of himself/herself or another person.

(d) Direct Relevance to the Formation or Performance of the Contract

Provided that it is directly related to the formation or performance of a contract, it is possible to process personal data if it is necessary to process personal data belonging to the parties to the contract.

(e) Legal Obligation

If data processing is mandatory for our Company to fulfill its legal obligations, the data of the personal data subject may be processed.

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(f) Publicization of Personal Data by the Personal Data Subject

If the data subject has made his/her personal data public by himself/herself, the relevant personal data may be processed limited to the publicization.

(g) Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data subject may be processed.

(h) Data Processing is Mandatory for the Legitimate Interest of our Company

Provided that it does not harm the fundamental rights and freedoms of the personal data subject, the personal data of the data subject may be processed if data processing is mandatory for the legitimate interests of our Company.

Accordingly, the basis of the personal data processing activity may be only one of the above-mentioned conditions, or more than one of these conditions may be the basis of the same personal data processing activity.

6. METHODS APPLIED FOR THE PROCESS OF DISPOSAL OF PERSONAL DATA and TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN FOR THE LEGAL DISPOSAL OF PERSONAL DATA

Our Company deletes, destroys or anonymizes personal data by the following methods in the event that all of the conditions for processing personal data specified in Articles 5 and 6 of the KVKK disappear. Our Company shows the utmost care and attention in the destruction of personal data. In this context, our Company takes the necessary technical and administrative measures in accordance with the provisions of Article 12 of the KVKK and the Regulation, the general principles stated above, this Policy and the decisions of the Personal Data Protection Board, according to the technological possibilities and the cost of implementation regarding the following issues. All transactions carried out within the scope of destruction are recorded by our Company and such records are kept for the specified periods. Unless otherwise decided by the Personal Data Protection 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.

(a) Methods of 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 necessary technical and administrative measures according to technological



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possibilities and implementation cost in order to ensure that deleted personal data is not accessed and reused for the relevant users.

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

In the cloud system, data is deleted by issuing a delete command. During the aforementioned process, the relevant user is deleted on the cloud system and the authorization to retrieve the data is removed.

Personal data on paper media are erased using the blackout method. With the blackout process, the personal data on the relevant document is cut out when possible, and when not possible, it is rendered invisible to the relevant users by using fixed ink in a way that cannot be returned and cannot be read with technological solutions.

Office files on the central server are deleted with the delete command in the operating system of the file or the access rights of the relevant user are removed on the file or the directory where the file is located.

Personal data on portable media are stored encrypted and deleted using software suitable for these media.

The relevant rows containing personal data are deleted with database commands (DELETE etc.).

(b) Methods of Disposal 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 implementation cost.

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

- Physical Disposal: Personal data may also be processed by non-automated means, provided that they are part of any data recording system. When destroying such data, the system of physically destroying the personal data in such a way that it cannot be used afterwards is applied. Destruction of data in paper and microfiche media should also be carried out in this way, as it is not possible to destroy them in any other way.
- Depending on the type of media, the destruction methods that can be used are listed below:
 - i) Network devices (switch, router, etc.): The storage media inside these devices are fixed. Most of the time, the products have a wipe command but not a destroy feature.



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ii) Flash based environments: Flash-based hard disks with ATA (SATA, PATA, etc.), SCSI (SCSI Express, etc.) interfaces are destroyed using the <block erase> command if supported, or using the manufacturer's recommended erase method if not supported.

iii) Mobile phones (Sim card and fixed memory spaces): Fixed memory spaces in portable smartphones have an erase command, but most do not have a destroy command. Therefore, only the erase activity is performed.

iv) Optical disks: Data storage media such as CDs and DVDs. They are disposed of by physical destruction methods such as incineration, fragmentation and melting.

- Destruction of personal data on paper and microfiche environments:

As the personal data on such media is permanently and physically written on the environment, the main environment must be disposed of. This is done by shredding or clipping the media with paper shredding or clipping machines into incomprehensibly small pieces that cannot be reassembled.

- Disposal of personal data in the cloud:

During the storage and use of personal data in such systems, they are encrypted by cryptographic methods and, where possible, encryption keys are used for personal data, in particular for each cloud solution from which services are received. When the cloud computing service relationship ends, all copies of the encryption keys necessary to make personal data usable are disposed of.

- During the above-mentioned situations, the Company fully complies with the provisions of the KVKK, the Regulation and other relevant legislation in order to ensure data security and takes all necessary administrative and technical measures.

(c) Methods of 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 natural 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, recipients or recipient groups. Our Company takes all necessary technical and administrative measures regarding the anonymization of personal data according to technological possibilities and implementation cost.



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In this context, our Company applies the following methods for anonymizing 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 the data from the relevant software in such a way as to make it inaccessible and non-reusable in any way for the Relevant Users.
- Deleting the relevant data in the cloud system by issuing a delete command; removing the access rights of the relevant user on the file or the directory where the file is located on the central server; deleting the relevant rows in databases with database commands or deleting the data on portable media, i.e. flash media, using appropriate software can be considered within this scope.
- However, if the deletion of personal data will result in the inability to access and use other data within the system, provided that the following conditions are met, personal data will also be deemed deleted if the personal data is archived by making it unassociated with the person concerned.

a) Not accessible to any other institution, organization or person,

b) Taking all necessary technical and administrative measures to ensure that personal data is only accessed by authorized persons.

c) Secure Erasure by an Expert: In some cases, it may agree with an expert to erase personal data on its behalf. In this case, personal data shall be securely erased by the person who is an expert in this field in such a way that it cannot be accessed and reused in any way for the Relevant Users.

- Obfuscation of Personal Data in Paper Environment:

It is the method of physically cutting and removing the relevant personal data from the document or making it invisible by using fixed ink in such a way that it cannot be reversed and cannot be read with technological solutions in order to prevent the misuse of personal data or to delete the data requested to be deleted.

7. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN FOR SECURE STORAGE OF PERSONAL DATA AND PREVENTION OF UNLAWFUL PROCESSING AND ACCESS

Our Company informs and trains the persons involved in the storage and destruction of personal data about the law on the protection of personal data and the processing of personal data in accordance with the law. In this context, employees of our Company and persons who learn personal data due to their duties store and destroy

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such information in accordance with the provisions of KVKK and other relevant legislation. This obligation continues even after the relevant persons leave their duties.

8. STORAGE AND DISPOSAL PERIODS

Our Company retains and destroys personal data only for the period specified in the legislation it is obliged to comply with or for the period required for the purpose for which they are processed.

If the personal data subject applies to our Company and requests the destruction of his/her personal data, our Company:

- (a) If all the conditions for processing personal data have disappeared:
 - (i) finalize the request of the personal data subject within thirty days at the latest and inform the personal data subject; and
 - (ii) If the personal data subject to the request has been transferred to third parties, notifies the third party of this situation; ensures that the necessary actions are taken before the third party.
- (b) If all the conditions for processing personal data have not disappeared, the request of the personal data subject may be rejected by explaining the reason in accordance with the third paragraph of Article 13 of the KVKK and notifies the personal data subject in writing or digitally within thirty days at the latest.

9. PERIODIC DISPOSAL PERIODS

Our Company disposes of personal data in the first periodic destruction process following the date on which the obligation to destroy personal data arises. In this context, our Company subjects personal data to destruction in 3-month periods if the obligation to dispose of personal data arises. The aforementioned period does not exceed the maximum periodic destruction period specified in Article 11 of the Regulation in any case and under any circumstances.



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The approximate storage and disposal periods of the data processed by the company are written as follows and are included in the inventory organized by the company.

Data Subject	Storage Duration	Disposal Duration
Employee	10 years following the termination of the employment relationship	Within 30 days of the data subject's application for destruction
Employee	10 years following the termination of the employment relationship	Within 180 days after the end of the retention period
Employee (Health Information)	20 years following the termination of the employment relationship	Within 180 days after the end of the retention period
Employee Candidate	Maximum 2 years	Within 180 days after the end of the retention period
Business Partner/Solution Partner/Consultant	10 years following the termination of the employment relationship	Within 180 days after the end of the retention period
Visitor	2 years	Within 180 days after the end of the retention period
Occupational Health and Safety Practices	10 years following the termination of the employment relationship	Within 180 days after the end of the retention period
Log/Recording/Tracking Systems	2 years	Within 180 days after the end of the retention period
Guest Registration Information	10 years	Within 180 days after the end of the retention period
Website Visitors	2 years	Within 180 days after the end of the retention period
Potential Guest	2 years	Within 180 days after the end of the retention period
Intern	1 year	Within 1 week after the end of the storage period



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10. ENFORCEMENT

This Policy entered into force on the date it was published on the website. The Policy may be updated from time to time in order to adapt to changing conditions and legislation. The updated Policy will enter into force on the date it is published on <http://qvv.com.tr/>. In case of any contradiction between this Policy and the provisions of KVKK, Regulation and QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi Personal Data Protection and Processing Policy, the provisions of KVKK, Regulation and QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi Personal Data Protection and Processing Policy shall prevail.