

# HİSARLAR MAKİNA PERSONAL DATA RETENTION AND DISPOSAL POLICY

## 1. PURPOSE OF DISPOSAL POLICY

The purpose of preparing this Disposal Policy (Policy) is, in case the personal data processed in accordance with the Law No. 6698 on the Protection of Personal Data (Law), the personal data processing conditions in Articles 4, 5 and 6 of the Law no longer exist, demonstrating of the methods of deletion, destruction or anonymization of personal data by **HİSARLAR MAKİNA** ex officio or upon the request of the data subject in accordance with the Regulation on the Deletion (Regulation), Destruction or Anonymization of Personal Data published in the Official Gazette dated 28/10/2017.

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|---------------------------------------|--|
| <b>Disposal</b>                       | Deletion, destruction or anonymization of personal data.   |
| <b>Recording Medium</b>               | Any medium where personal data is processed wholly or partially automatically or non-automatically, provided that it is a part of any data recording system.   |
| <b>Personal Data</b>                  | Any information relating to an identified or identifiable natural person.  |
| <b>Personal Data Policy</b>           | It refers to the Protection of Personal Data and Privacy Policy prepared by <b>HİSARLAR MAKİNA</b> .   |
| <b>Processing of Personal Data</b>    | All kinds of operations performed on the data such as obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system. |
| <b>Anonymization of Personal Data</b> | Making personal data incapable of being associated with an identified or identifiable natural person under any circumstances, even by matching with other data.  |
| <b>Deletion of Personal Data</b>      | Deletion of personal data, making personal data inaccessible and non-reusable for Relevant Users.  |
| <b>Destruction of Personal Data</b>   | The process of making personal data inaccessible, irretrievable and unusable by anyone in any way.   |
| <b>Periodic Destruction</b>           | The deletion, destruction or anonymization process, which will be carried out ex officio at repetitive intervals and specified in the personal data storage and destruction policy, in the event that all of the personal data processing conditions in the Law are eliminated.  |

### **3. RECORDING MEDIUMS WHERE PERSONAL DATA ARE STORED**

Personal data of data subjects are securely stored by HİSARLAR MAKİNA in the environments listed below in accordance with the relevant legislation, especially the provisions of the Law:

#### **Electronic media:**

- CRM
- MS SQL Server
- Email Box
- Microsoft Office Programs
- Image Recorders

(Additions can be made according to different electronic media used in HİSARLAR MAKİNA.)

#### **Physical Medium**

- Unit Cabinets
- Files
- Archive

(Additions can be made according to different physical medium used in HİSARLAR MAKİNA.)

### **4. EXPLANATIONS REGARDING THE REASONS REQUIRING STORAGE AND DISPOSAL**

Personal data of data subjects are stored by HİSARLAR MAKİNA, especially for the following purposes, within the limits specified in the Law and other relevant legislation:

- a. Sustaining commercial activities,
- b. Fulfillment of legal obligations,
- c. Planning and execution of employee rights and fringe benefits,
- d. Processing the above-mentioned physical or electronic media in order to manage customer relations.

#### **The reasons for data retention are as follows:**

- a. Personal data is directly related to the establishment and performance of contracts,
- b. Establishment, use or protection of a right of personal data,
- c. Provided that personal data does not harm the fundamental rights and freedoms of individuals, HİSARLAR MAKİNA has a legitimate interest,
- d. Fulfilling any legal obligations of HİSARLAR MAKİNA with personal data,
- e. Explicitly stipulating the storage of personal data in the legislation,
- f. Explicit consent of data subjects in terms of storage activities that require the explicit consent of data subjects.

In accordance with the Regulation, the personal data of the data subjects are deleted,

destroyed or anonymized by **HİSARLAR MAKİNA** ex officio or upon request in the cases listed below:

- a. Changing or repealing the provisions of the relevant legislation, which is the basis for the processing or storage of personal data,
- b. The disappearance of the purpose that requires the processing or storage of personal data,
- c. Elimination of the conditions requiring the processing of personal data in Articles 5 and 6 of the Law,
- d. In cases where the processing of personal data takes place only on the basis of express consent, the data subject withdraws his consent,
- e. The data controller accepts the application made by the data subject regarding the deletion, destruction or anonymization of his/her personal data within the framework of his/her rights in subparagraphs 2 (e) and (f) of Article 11 of the Law,
- f. In cases where the data controller rejects the application made by the data subject for the deletion, destruction or anonymization of his personal data, his response is found insufficient or he does not respond within the time stipulated in the Law; complaining to the Board and approval of this request by the Board,
- g. The absence of any conditions justifying the retention of personal data for a longer period of time, although the maximum period for keeping personal data has passed.

## **5. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA**

In accordance with Article 12 of the Law, **HİSARLAR MAKİNA** takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent the unlawful processing of the personal data it processes, to prevent unlawful access to the data and to ensure the preservation of the data and also it makes or has the necessary inspections made in this context.

All of the technical and administrative measures taken are regulated in the Personal Data Policy. In the event that the processed personal data is taken by third parties by unlawful means, despite all technical and administrative measures have been taken, **HİSARLAR MAKİNA** informs the relevant units (Personal Data Protection Authority) as soon as possible.

### **5.1. Technical Measures:**

- Technical measures are taken in accordance with the developments in technology, the measures taken are periodically updated and renewed.
- Access and authorization technical solutions are implemented in accordance with the legal compliance requirements determined on the basis of the business unit.
- Access authorizations are limited and authorizations are reviewed regularly.
- The technical measures taken are checked periodically, the risky issues are re-evaluated and the necessary technological solution is produced.
- Software and hardware including virus protection systems and firewalls are installed.
- Personnel knowledgeable in technical matters are employed.
- Security scans are regularly passed to detect security vulnerabilities in applications where personal data is collected. The security vulnerabilities found are closed.
- Provides control of system vulnerabilities by taking penetration test service when needed.
- The destruction of personal data is ensured in a way that cannot be recycled and leaves no audit trail.

## 5.2 Administrative Measures:

- Employees are trained on technical measures to prevent unlawful access to personal data.
- Personal data processing on a business unit basis, in accordance with legal compliance requirements, personal data access and authorization processes are designed and implemented within **HİSARLAR MAKİNA**. In limiting access, whether the data is of special nature and its importance are also taken into account.
- **HİSARLAR MAKİNA** has added the following records for the legal processing of personal data to any document that regulates the relationship with its personnel and contains personal data:

It is necessary to act in accordance with the obligations stipulated by the law,

Personal data should not be disclosed,

Personal data should not be used unlawfully.

Continuation of the confidentiality obligation regarding personal data even after the termination of the employment contract with **HİSARLAR MAKİNA**.

- Employees are informed that they cannot disclose the personal data they have learned to others in violation of the provisions of the Law and that they cannot use it for purposes other than processing, and that this obligation will continue after they leave their job, and necessary commitments are taken from them in this direction.
- Provisions are added to the contracts concluded by **HİSARLAR MAKİNA** with the persons to whom the personal data is transferred in accordance with the law that the persons to whom the personal data are transferred will take the necessary security measures to protect the personal data and ensure that these measures are complied with in their own establishments.
- In case the processed personal data is obtained by others unlawfully, it notifies the person concerned and the Board as soon as possible.
- When necessary, it employs knowledgeable and experienced personnel about the processing of personal data and provides training to its personnel within the scope of personal data protection legislation and data security.
- **HİSARLAR MAKİNA** carries out the necessary inspections and has them done in order to ensure the implementation of the provisions of the Law. It eliminates privacy and security vulnerabilities that arise as a result of audits.

## 6. MEASURES TAKEN REGARDING THE DISPOSAL OF PERSONAL DATA

Although it has been processed in accordance with the provisions of the relevant law, **HİSARLAR MAKİNA** may delete or destroy personal data, upon its own decision or upon the request of the personal data subject, in the event that the reasons requiring its processing are eliminated. After the deletion of personal data, the persons concerned will not be able to access and use the deleted data again in any way. An effective data tracking process will be managed by **HİSARLAR MAKİNA** regarding the identification and monitoring of personal data destruction processes. The sequence of the process will be to determine the data to be deleted, to identify the relevant persons, to determine the access methods of the persons and to delete the data immediately afterwards.

**HİSARLAR MAKİNA** may use one or more of the following methods, depending on the environment in which the data is recorded, in order to destroy, delete or anonymize personal data.

## 6.1. Methods for Deletion, Destruction and Anonymization of Personal Data

### 6.1.1. Deletion of Personal Data

Deletion of personal data is the process of making personal data inaccessible and non-reusable for the relevant users. As a method of deleting personal data, **HİSARLAR MAKİNA** can use one or more of the following methods:

- Personal data in the paper environment will be processed by drawing, painting, cutting or deleting with the blanking method.
- Access rights of users for office files in the central file will be removed.
- Rows or columns containing personal information in databases will be deleted with the 'Delete' command.
- When necessary, it will be securely deleted with the help of an expert.

### 6.1.2. Destruction of Personal Data

Destruction of personal data is the process of making personal data inaccessible, unrecoverable and unusable by anyone in any way.

- **Physical Destruction**
- **Destroying with a Paper Shredder**
- **De-magnetizing:** It is the method of corrupting the data on it in an unreadable way by passing the magnetic media through special devices where it will be exposed to high magnetic fields.

### 6.1.3. Making Personal Data Anonymous

Anonymization of personal data means that personal data cannot be associated with an identified or identifiable natural person under any circumstances, even by matching them with other data. **HİSARLAR MAKİNA** can use one or more of the following methods to anonymize personal data:

- **Masking:** Data masking is a method of anonymizing personal data by removing the basic identifying information of personal data from the data set.
- **Deregistration:** In the deregistration method, the data line containing the singularity among the data is removed from the records and the stored data is anonymized.
- **Sectional Hiding:** The sectional hiding method, on the other hand, provides anonymization by hiding the relevant data if it has a determinative feature, since a single data creates a very rarely visible combination.
- **Global Coding:** With the data derivation method, a more general content than the content of the personal data is created and it is ensured that the personal data cannot be associated with any person. For example, specifying ages instead of birth dates, specifying the region of residence instead of full address...

• **Adding Noise** The method of adding noise to the data is anonymized by adding some positive or negative deviations to the existing data at a determined rate, especially in a data set where numerical data are predominant. For example, in a data group with weight values (+/-) 3 kg deviation is used to prevent the real values from being displayed and the data is anonymized. The deviation applies equally to each value.

Personal data that has been anonymized in accordance with Article 28 of the Law may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the Law and the explicit consent of the personal data subject will not be sought.

**HİSARLAR MAKİNA** will be able to take decisions ex officio regarding the deletion, destruction or anonymization of personal data and freely determine the method to be used according to the category it has chosen. In addition, if the person concerned chooses one of the categories of deletion, destruction or anonymization of his personal data during the application, within the scope of Article 13 of the Regulation, **HİSARLAR MAKİNA** will be at its discretion regarding the methods to be used in the relevant category.

## 7. PERSONAL DATA RETENTION AND DISPOSAL PERIODS

**HİSARLAR MAKİNA** stores personal data for the period necessary for the purpose for which they are processed. In the event that the primary purpose of collecting personal data or, if any, the basis for secondary processing specified in this Policy disappears, personal data may continue to be stored for the periods specified in the Law.

If a period of time is stipulated in the legislation regarding the storage of the personal data in question, this period shall be complied with. In the absence of a period stipulated in the legislation, personal data in the Law and legislation will be kept for the maximum period of time. These periods have been determined by evaluating the data categories and data subject groups of **HİSARLAR MAKİNA**, considering the maximum limitation period (10 years) in the Turkish Code of Obligations, which will ensure that the data obtained as a result of this evaluation will fulfill the obligations in the laws.

In the event that the obligation to delete, destroy or anonymize due to the expiry of these periods arises, **HİSARLAR MAKİNA** deletes, destroys or anonymizes personal data in the first periodical destruction process following this date.

## 8. COMPANY PERIODIC DISPOSAL TIMES

Periodic destruction period of **HİSARLAR MAKİNA** is **(PERIODIC DISPOSAL TIME MUST BE DETERMINED)** years. Personal data, whose storage period has expired, is destroyed in accordance with the procedures set forth in the Policy, in ...-year periods, within the framework of this destruction policy. In the said systems, the information will not be retrieved again, and the documents, files, CDs, floppy disks, hard disks, if any, in which the data are recorded, will be deleted in a way that cannot be recycled.

## 9. PERSONNEL

Within the scope of the Law, **HİSARLAR MAKİNA**, as a data controller, is obliged to fulfill its obligations in terms of the implementation of the data storage and destruction process of the Law, together with its personnel, based on the 1st paragraph of Article 11 of the Regulation. Each department responsible will be responsible for inspecting whether the relevant users in the departments act in accordance with this Policy and Personal Data Policy prepared within the framework of the Law and Regulation. All department head will report the transactions they perform in accordance with this Policy during the specified periodical destruction periods to **HİSARLAR MAKİNA** Personal Data Controller. The decision made in the results of the study for these reports will be put into practice.

## 10. APPLICATION OF THE RELEVANT PERSON

The person concerned may request the deletion or destruction of their personal data by applying to **HİSARLAR MAKİNA** with the application petition of the Personal Data Policy, which can be obtained upon request from **HİSARLAR MAKİNA**, pursuant to Article 13 of the Law and Article 12 of the Regulation.

1. If all the conditions for processing personal data are no longer valid, the data controller deletes, destroys or anonymizes the personal data subject to the request. The data controller finalizes the request of the data subject **within thirty days** at the latest **and informs the data subject**.
2. If all the conditions for processing personal data have been removed and the personal data subject to the request has been transferred to third parties, the data controller informs the third party of this situation and ensures that the necessary actions are taken within the scope of the Regulation before the third party.
3. If all the conditions for processing personal data are not eliminated, this request may be rejected by the data controller by explaining the reason, and the refusal is notified to the relevant person in writing or electronically within thirty days at the latest. **HİSARLAR MAKİNA** may refuse to delete the personal data of the data controller for the following reasons:
  - a. Processing personal data for purposes such as research, planning and statistics by making it anonymous with official statistics.
  - b. Processing personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy or personal rights or constitute a crime.
  - c. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.
  - d. Processing of personal data by judicial authorities or execution authorities in relation to



investigation, prosecution, trial or execution proceedings.

e. The processing of personal data is necessary for the prevention of crime or for criminal investigation.

f. Processing of personal data made public by the personal data subject.

g. Personal data processing is required by the responsible and authorized public institutions and organizations and professional organizations in the nature of public institutions for the execution of supervisory or regulation duties and for disciplinary investigation or prosecution based on the authority granted by the law.

h. The processing of personal data is necessary for the protection of the economic and financial interests of the State with regard to budgetary, tax and financial matters.

i. The possibility of the personal data subject's request to prevent the rights and freedoms of other persons.

j. Making demands that require disproportionate effort.

k. The requested information is publicly available.

### **10.1 Personal Data Subject's Right to Complain to the KVK (Personal Data Protection) Board**

In case the application is rejected in accordance with Article 14 of the Law, the response is found insufficient or the application is not answered in due time, he/she may file a complaint with the Board within thirty days from the date of learning of **HİSARLAR MAKİNA**'s response, and in any case **within sixty days** from the date of application..

## **11. INFORMATION THAT THE COMPANY MAY REQUEST FROM THE APPLICANT PERSONAL DATA SUBJECT**

**HİSARLAR MAKİNA** may request information from the person concerned in order to determine whether the applicant is the subject of personal data. **HİSARLAR MAKİNA** may ask questions about the personal data subject's application in order to clarify the issues in the personal data subject's application.

## **12. REVISION AND ABOLISHMENT**

In case the Policy is changed or repealed, the amended version of the Policy or a new policy sample will be announced on the website of **HİSARLAR MAKİNA** (<https://hisarlar.com.tr/>).