

POLICY FOR STORAGE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

1. PURPOSE

As MAARİFA, since the enactment of the Personal Data Protection Law No. 6698 (“KVKK” or “Law”), we attach great importance to the protection of personal data belonging to all natural persons we come into contact with while conducting our commercial activities. This **Policy for Storage, Destruction, and Anonymization of Personal Data (“Policy”)** has been prepared to inform you about the processes and principles of collecting, using, sharing, storing, deleting, destroying, and anonymizing personal data by MAARİFA.

In this Policy, the principles regarding the processing of personal data belonging to data subjects by MAARİFA are provided in accordance with the order of the regulations in KVKK. These explanations cover MAARİFA employees, our active and potential customers, our visitors, and other natural persons in contact with MAARİFA.

As a Data Controller with the obligation to register in the Registry, MAARİFA is obliged to prepare a Policy to store personal data in line with the personal data inventory, and to delete, destroy, or anonymize it when necessary, and to act in accordance with this Policy.

The following principles will be valid in the storage and destruction of personal data:

- a) The general principles in Article 4 of the Law will be complied with.
- b) MAARİFA acknowledges that preparing this Policy alone does not mean that personal data is deleted, destroyed, or anonymized in accordance with the Regulation, the Law, and relevant legislation.
- c) MAARİFA declares, acknowledges, and undertakes to act in accordance with the security measures specified in Article 12 of the Law, the provisions in the relevant legislation, the decisions of the Personal Data Protection Board, and this Policy while storing, deleting, destroying, or anonymizing personal data.
- d) MAARİFA undertakes to ensure compliance with this Policy and the tools, programs, and processes to be applied in accordance with the Policy while deleting, destroying, or anonymizing personal data that it holds, processed wholly or partially automatically or by non-automatic means, provided that they are part of any data recording system.

2. SCOPE

This Policy applies to all processes of MAARIFA.

3. DEFINITIONS

Law	Personal Data Protection Law No. 6698.
Regulation	Regulation on the Deletion, Destruction, or Anonymization of Personal Data.
Board	Personal Data Protection Board.
Recording Medium	Any environment where personal data processed by automated or non-automated means, provided that it is part of any data recording system, is located.
Personal Data	
Processing Inventory	Inventory created and detailed by data controllers by associating personal data processing activities carried out with business processes, purposes of processing personal data, data category, transferred recipient group, and group of people subject to the data.
Destruction	Deletion, destruction, or anonymization of personal data.
Periodic Destruction	Deletion, destruction, or anonymization of personal data at recurring intervals specified in the personal data storage and destruction policy if all processing conditions of personal data in the Law are eliminated.
Registry	The Registry of Data Controllers kept by the Presidency.
Data Recording System	The system in which personal data is processed by being structured according to specific criteria.
Data Controller	The natural or legal person who determines the purposes and means of processing personal data, and who is responsible for the establishment and management of the data recording system.
Recipient Group	The category of natural or legal persons to whom personal data is transferred by the data controller.

Relevant User Persons who process personal data within the organization of the data controller or in line with the authorization and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of the data.

The definitions in the Personal Data Protection Policy also apply within this Policy.

4. REFERENCES

Personal Data Protection Law No. 6698

Regulation on the Deletion, Destruction, or Anonymization of Personal Data.

Regulation on the Registry of Data Controllers and other relevant regulations.

5. PROCEDURES AND PRINCIPLES FOR THE PROTECTION OF PERSONAL DATA

5.1. GENERAL PRINCIPLES FOR PROCESSING

MAARİFA processes personal data in accordance with the procedures and principles stipulated in KVKK and other relevant laws. In this context, MAARİFA fully complies with the following principles while processing personal data as provided in KVKK:

Compliance with law and honesty rules: MAARİFA's data processing processes are conducted within the limits required by all relevant legislation, particularly the Constitution and KVKK, and the rules of honesty.

Being accurate and up-to-date when necessary: MAARİFA takes necessary measures to ensure that personal data processed by MAARİFA is accurate and up-to-date, and provides opportunities for data subjects to ensure that processed data reflects the real situation.

Processing for specific, explicit, and legitimate purposes: MAARİFA processes personal data only for clear and definite legitimate purposes and does not process data for purposes other than these. In this context, MAARİFA processes personal data only if it is related to and necessary for the business relationship established with data subjects.

Being relevant, limited, and proportionate to the purposes for which they are processed: MAARİFA processes data in a manner that is suitable for achieving the purposes determined according to data categories, relevant to the purpose, and proportionate to the purpose, and avoids processing personal data that is not needed.

Being retained for the period stipulated in the relevant legislation or for the period required for the purpose for which they are processed: Personal data processed by MAARİFA is retained only for the period stipulated in the relevant legislation or for the period required for the purpose for which they are processed. In this context, MAARİFA complies with the periods stipulated in the relevant legislation for the retention of data; if such a period is not stipulated, it retains data only for the period required for the purpose for which it is processed. MAARİFA does not retain data based on the possibility of future use.

5.2.CONDITIONS FOR PROCESSING PERSONAL DATA

The conditions for processing personal data are regulated in KVKK, and MAARİFA processes personal data in accordance with the following conditions. Except for the exceptions stated in the Law, MAARİFA processes personal data only by obtaining the explicit consent of data subjects. However, in the presence of the following conditions stated in the Law, personal data may be processed even without the explicit consent of the data subject.

If it is expressly provided for by the laws,

If it is necessary to protect the life or physical integrity of the person or another person who is unable to express their consent due to actual impossibility or whose consent is not legally valid,

If it is necessary to process personal data of the parties to a contract, provided that it is directly related to the establishment or performance of the contract,

If it is necessary for the data controller to fulfill its legal obligation,

If the data subject has made the data public,

If it is necessary for the establishment, exercise, or protection of a right,

If it is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

For the processing of sensitive personal data, which is considered to be of more critical importance for data subjects, MAARIFA shows special sensitivity. In this context, such data is processed only with the explicit consent of the data subjects, except for the health and sexual life-related data, which can be processed without the explicit consent of the data subject, provided that sufficient measures determined by the Board are taken. However, sensitive personal data other than those related to health and sexual life may also be processed without the explicit consent of the data subject in cases stipulated by the laws. Health and sexual life-related data can be processed without explicit consent, provided that sufficient measures are taken and the following reasons exist:

Protection of public health,

Preventive medicine,

Medical diagnosis,

Execution of treatment and care services,

Planning and management of health services and their financing.

5.3.PURPOSES OF PROCESSING PERSONAL DATA

Your personal data obtained by MAARIFA can be processed within the following scopes:

Human resources operations,

Creation of personnel files, payroll,

Management of employee contract processes,

Execution of insurance renewal processes,

Provision of health services to employees,

Keeping lists of blood types,

Allocation of vehicles, phones, and lines within the scope of employment contracts,

Execution of proxy and signature circular acquisition processes,
Conducting compliance assessments within the scope of subcontracting,
Preparing for and executing emergency operations,
Execution of occupational health and safety processes,
Management of accidents and legislation within the scope of occupational health and safety,
Structuring service procurement contract processes,
Planning, auditing, and executing information security processes,
Opening and authorizing email accounts for employees,
Keeping internet log records,
Planning and executing corporate communication activities,
Planning personnel travels and executing advance processes,
Executing and tracking document transactions,
Creating card and service records for personnel entries,
Ensuring the continuity of budgeting processes,
Providing and managing personnel training,
Planning and executing internal training and orientation programs,
Internal company operations,
Legal, technical, and administrative activities,
Strategic planning and managing business partner/supplier relations,
Planning and executing corporate communication activities,
Customer Relationship Management Processes

The categories mentioned above are for your information purposes only, and other categories may be added by us to carry out MAARIFA's future commercial and operational activities. In such cases, MAARIFA will continue

to update the specified categories for you in the relevant texts to inform you as quickly as possible.

5.4.STORAGE OF PERSONAL DATA

Your personal data is securely stored in physical or electronic environments for the periods stipulated in the relevant legislation.

5.5. TRANSFER OF PERSONAL DATA TO PERSONS WITHIN THE COUNTRY

MAARİFA carefully complies with the conditions stipulated in KVKK for sharing personal data with third parties, without prejudice to the provisions in other laws. In this context, personal data is not transferred to third parties by MAARİFA without the explicit consent of the data subject. However, personal data may be transferred by MAARİFA without obtaining the explicit consent of the data subject in the presence of one of the following conditions stipulated in KVKK:

If it is expressly provided for by the laws,

If it is necessary to protect the life or physical integrity of the person or another person who is unable to express their consent due to actual impossibility or whose consent is not legally valid,

If it is necessary to process personal data of the parties to a contract, provided that it is directly related to the establishment or performance of the contract,

If it is necessary for the data controller to fulfill its legal obligation,

If the data subject has made the data public,

If it is necessary for the establishment, exercise, or protection of a right,

If it is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

Sensitive personal data may be transferred without obtaining explicit consent, provided that sufficient measures are taken, in cases where the processing of such data is permitted by law for purposes other than health and sexual life.

Sensitive personal data related to health and sexual life may be transferred without obtaining explicit consent, provided that sufficient measures are taken, for purposes such as:

Protection of public health,

Preventive medicine,

Medical diagnosis,

Execution of treatment and care services,

Planning and management of health services and their financing.

The conditions specified in the processing of sensitive personal data are also adhered to in the transfer of these data.

5.6. TRANSFER OF PERSONAL DATA ABROAD

For the transfer of personal data abroad, the explicit consent of the data subject is sought in line with Article 9 of KVKK. However, in the presence of conditions where the processing of personal data, including sensitive personal data, without obtaining the explicit consent of the data subject is allowed, personal data may be transferred abroad without obtaining the explicit consent of the data subject, provided that there is adequate protection in the foreign country where the personal data is transferred, as determined by the Board. If the country to which the transfer will be made is not among the countries with adequate protection as determined by the Board, MAARİFA and the relevant data controller/data processor in the foreign country will commit adequate protection in writing.

5.7. RIGHTS OF DATA SUBJECTS UNDER ARTICLE 11 OF THE PERSONAL DATA PROTECTION LAW NO. 6698

By applying to our Company, you can request the following regarding your personal data:

- a) Learning whether your personal data is processed or not,
- b) Requesting information if your personal data has been processed,

- c) Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- d) Knowing the third parties to whom personal data is transferred within the country or abroad,
- e) Requesting correction of personal data if it is incomplete or incorrectly processed,
- f) Requesting deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law,
- g) Requesting notification of the processes carried out in accordance with subparagraphs (e) and (f) to third parties to whom personal data is transferred,
- h) Objecting to a result arising against the person by analyzing the processed data exclusively through automated systems,
- i) Requesting compensation for the damages in case of suffering loss due to illegal processing of personal data.

Data subjects can use their rights listed above by sending a wet-signed copy of the data subject application form provided in Appendix 1 of this Policy to MAARİFA communication addresses by mail, email, or registered mail. Detailed information on filling out and sending the form is provided in the application form in Appendix 1.

MAARİFA will deliver the response to the relevant data subject physically or electronically. kvkk@maarifa.com.tr will conclude the request free of charge within thirty (30) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee determined in the tariff set by the Board will be charged to the relevant persons. In addition, additional information or documents may be requested from the applicants by MAARİFA during the process of concluding the requests of data subjects.

5.8.MEASURES TAKEN FOR DATA SECURITY

MAARİFA takes all necessary technical and administrative measures to ensure the appropriate level of security required for the protection of personal data. The measures stipulated in Article 12(1) of KVKK are as follows:

Preventing the unlawful processing of personal data,

Preventing unlawful access to personal data,

Ensuring the protection of personal data.

5.9.PROCESSING OF VISUAL RECORDS

To ensure the general and commercial security of the company's facilities and businesses, visual records of visitors, employees, and other relevant persons are taken and stored securely in physical or electronic environments for the period appropriate to the purposes of processing, in accordance with the fundamental principles stipulated in KVKK and this Policy. Visible warnings are placed in areas where visual recording is conducted to inform data subjects. In this context, MAARİFA acts in compliance with all obligations stipulated in the relevant legislation, particularly KVKK. Visual recording is not conducted in areas where privacy is high.

6. DELETION, DESTRUCTION, OR ANONYMIZATION OF PERSONAL DATA

Personal data processed for the purposes specified in this Personal Data Protection Policy will be deleted, destroyed, or anonymized by us when the purpose of processing disappears and the periods stipulated by laws expire, in accordance with Article 7/1 of Law No. 6698.

6.1.Deletion of Personal Data

The deletion of personal data processed by automated means wholly or partially means making such personal data inaccessible and non-reusable for relevant users in any way. The data controller explains in its relevant policy and procedures how the conditions specified in the third paragraph are met for considering personal data deleted. The deletion of personal data processed by non-automated means that are part of any data recording system is carried out by anonymizing unnecessary personal data in paper form, either by scanning or not digitizing them. In cases where MAARİFA processes data wholly or partially by automated means, MAARİFA must make the data inaccessible and non-reusable in any way when deleting personal data. While doing this, MAARİFA must guarantee that the data is inaccessible and non-reusable by any user. This guarantee is under the responsibility of the data controller.

If personal data that should not be deleted are also affected and made inaccessible or unusable during the deletion, MAARİFA will ensure that the following methods, which can be applied together, are also considered deletion, as decided by the KVKK Working Group:

- a) Archiving personal data in a way that it cannot be associated with the relevant person,
- b) Making personal data inaccessible to all kinds of access,
- c) Taking all necessary technical and administrative measures to ensure that personal data can only be accessed by authorized persons when necessary,
- d) Updating the specified deletion methods in accordance with the Regulation, if applicable, under the responsibility of the Data Controller.

6.2.DESTRUCTION OF PERSONAL DATA

The destruction process will be carried out when MAARİFA processes data in physical recording environments, and MAARİFA is obliged to ensure that these data cannot be retrieved. During these processes, MAARİFA employees and relevant departments are obliged to notify the KVKK Working Group of the relevant data to be destroyed. MAARİFA will take all necessary technical and administrative measures afterward.

6.3.ANONYMIZATION OF PERSONAL DATA

The anonymization process means making personal data processed by MAARİFA by fully or partially automated means in such a way that they cannot be associated with an identified or identifiable natural person, even if they are matched with other data.

The anonymization of personal data is the responsibility of the data owner business unit within MAARİFA. The data owner business unit can receive support from different departments of MAARİFA, provided that the inspection of the data destruction is carried out by itself.

During the anonymization of data, MAARİFA may use methods such as one-way functions and encryption. If there is uncertainty about the accuracy of the method to be applied, the KVKK Working Group should be consulted.

7. METHODS AND PROCESS OF DESTRUCTION OF PERSONAL DATA

For the destruction of personal data, MAARİFA defines all methods that can be used during destruction in this Policy. The data owner business unit is

responsible for selecting and applying the appropriate method from this Policy according to the situation.

MAARIFA employees will perform the destruction by selecting the appropriate method from the following methods:

1. Overwriting:

Writing random data consisting of 0s and 1s at least 8 times with software on magnetic media and rewritable optical media, making the old data unreadable.

2. Degaussing:

The process of rendering data on magnetic media unreadable by physically changing the media in a high-value magnetic field.

3. Physical Destruction:

The process of physically destroying optical or magnetic media by melting, pulverizing, grinding, or similar methods. This method is applied in cases where degaussing or overwriting methods fail.

4. Cloud Destruction:

The process of destroying all copies of encryption keys after notifying the contracted service provider of the destruction of personal data stored on cloud systems.

5. Destruction of Personal Data in Peripheral Systems:

The destruction process that must be applied by overwriting, degaussing, or physically destroying existing internal units or the entire device containing personal data in systems such as printers, fingerprint units, door entry turnstiles, etc. Such destructions must be carried out before the devices are subject to backup, maintenance, or similar processes.

8. STORAGE AND DESTRUCTION PERIODS

1. Periodic Destruction and Legal Retention Periods:

Physical and digital data that have completed their legal retention and destruction periods are periodically destroyed. MAARIFA deletes,

destroys, or anonymizes personal data in the first periodic destruction process following the date on which the obligation to delete, destroy, or anonymize personal data arises. Periodic destruction is carried out at six-month intervals for all personal data. The transactions related to deleted, destroyed, and anonymized data are kept for at least three years, independent of other legal obligations.

2. Process of Deletion and Destruction Upon Data Subjects' Requests:

In cases where data subjects apply to our company and request the deletion or destruction of their personal data, we check the current status of the conditions for processing personal data and take the necessary actions accordingly. If all conditions for processing personal data have disappeared, we delete, destroy, or anonymize the personal data subject to the request. Our company will conclude the relevant person's request within thirty days at the latest and inform the relevant person. If all conditions for processing personal data have disappeared and the personal data subject to the request has been transferred to third parties, the data controller notifies the third party of this situation and ensures that the necessary actions are taken within the scope of the Regulation. If all conditions for processing personal data have not disappeared, our company may reject the request by explaining the reason to the relevant data subject and notify the relevant person in writing or electronically within thirty days at the latest.

9. CHANGES TO THE POLICY

1. After any official changes to the relevant legislation, MAARIFA may amend this Policy to comply with these changes.
2. MAARIFA will update the revised Policy so that it can be reviewed and will share the updated Policy with its employees via email and make it accessible to employees through the corporate intranet.

10. ENFORCEMENT

This Policy, prepared by MAARIFA, entered into force on 01.05.2024.