

ORDULU TECHNOLOGY INC. PERSONAL DATA STORAGE AND DELETION PROCESS

1. PURPOSE

The Personal Data Storage and Destruction Policy has been prepared in order to determine the procedures and principles regarding the works and transactions regarding the storage and destruction activities carried out by Ordulu Technology Inc.

This policy has been prepared by our Company in order to determine the procedures and principles regarding the processing of personal data belonging to Company employees, employee candidates, suppliers, customers, visitors and other third parties in accordance with the Constitution of the Republic of Turkey, international conventions, the Law No. 6698 on the Protection of Personal Data and other relevant legislation, and the deletion, destruction or anonymization of personal data in the event that all processing conditions are eliminated.

The protection of personal data and the observance of the fundamental rights and freedoms of natural persons whose personal data are collected is the basic principle of our policy regarding the processing of personal data.

Our Company carries out the works and transactions regarding the storage and destruction of personal data in accordance with the Policy prepared in line with the principles listed.

2. SCOPE

Personal data belonging to Company employees, employee candidates, product and service recipients, market suppliers and other third parties are within the scope of this Policy and this Policy will be applied in all recording media and activities for personal data processing in which personal data under the control of the Company or managed by the Company are processed.

3. DEFINITIONS

Recipient Group: The category of natural or legal person to whom personal data is transferred by the data controller.

Explicit consent: Consent on a specific subject, based on information and expressed with free will.

Anonymization: Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.

Electronic Media: Media in which personal data can be created, read, changed and written with electronic devices.

Non-Electronic Media: All written, printed, visual, etc. media other than electronic media,

Relevant person: The natural person whose personal data is processed,

Destruction: Deletion, destruction or anonymization of personal data, **Law:**

Law No. 6698 on the Protection of Personal Data,

Recording Medium: Any medium in which personal data processed by fully or partially automated or non-automated means, provided that it is a part of any data recording system.

Personal data: Any information relating to an identified or identifiable natural person,

Personal Data Processing Inventory: The inventory that data controllers create by associating the personal data processing activities they carry out depending on their business processes with the purposes and legal reason for processing personal data, data category, transferred recipient group and data subject group, and detailing the maximum retention period required for the purposes for which personal data are processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security inventory.

Processing of Personal Data: All kinds of operations performed on personal data such as obtaining, recording, storing, changing, 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 part of any data recording system.

Sensitive Personal Data: Data relating to race, ethnic origin, political opinions, philosophical beliefs, religious, sectarian or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

Periodic Destruction: The process of deletion, destruction or anonymization to be carried out ex officio at recurring intervals specified in the personal data storage and destruction policy in the event that all of the conditions for processing personal data specified in the Law disappear,

Data processor: The natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.

Data Processor: A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.

Data Recording System: The recording system in which personal data is structured and processed according to certain criteria.

Data Controller: The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

4. RECORDING MEDIUMS

Personal data is stored in electronic and non-electronic media in accordance with the law.

ELECTRONIC MEDIUM	NON-ELECTRONIC MEDIUM
<ul style="list-style-type: none"> • - Servers (Domain, backup, e-mail, database, web, file sharing, etc.) • Personal computers (Desktop, laptop) • Mobile devices (phones, tablets, etc.) 	<ul style="list-style-type: none"> • Paper, files (personal files) • Manual data recording systems (annual leave book, collection receipt book) • Camera/video recordings

5. EXPLANATIONS ON THE LEGAL AND TECHNICAL REASONS FOR THE STORAGE AND DELETION OF PERSONAL DATA

Personal Data processed by the Company are stored and deleted in accordance with the Law. Pursuant to Article 7 of the Law, personal data must be deleted, destroyed or anonymized if the reasons requiring its processing disappear. In this context, detailed explanations regarding storage and destruction are given below.

6. DISCLOSURES RELATED TO CUSTODY

Article 3 of the Law defines the concept of processing personal data, Article 4 states that the personal data processed must be linked, limited and measured for 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 Articles 5 and 6 list the conditions for processing personal data. Personal data that must be kept for the purposes of processing within the framework of our Company's activities are kept for the period stipulated in the relevant legislation or in accordance with our processing purposes.

6.1. LEGAL GROUNDS REQUIRING RETENTION

Personal Data processed within the framework of the activities of the Authority are retained for the period stipulated in the relevant legislation. In this context, personal data according to

- Law No. 6698 on the Protection of Personal Data
- Turkish Commercial Code No. 6102
- Turkish Code of Obligations No. 6098
- Law No. 5510 on Social Security and General Health Insurance
- Law No. 6331 on Occupational Health and Safety
- Law No. 4982 on Access to Information
- Law No. 3071 on the Exercise of the Right to Petition

- Labor Law No. 4857
- Law No. 6563 on the Regulation of Electronic Commerce
- Other secondary regulations in force under these laws

are kept for the retention periods stipulated in the Framework. If no period is stipulated in the legislation; personal data is stored until the moment the purpose requiring the processing of personal data disappears.

6.2 REASONS REQUIRING DELETION

Personal Data is deleted, destroyed or ex officio deleted, destroyed or anonymized by the Company upon the request of the relevant person in cases of when/where:

- the provisions of the relevant legislation that constitute the basis for the processing of personal data are changed or abolished.
- the purpose of requiring processing or storage disappears.
- the processing of personal data is carried out only on the basis of explicit consent and when the relevant person withdraws its explicit consent.
- the application made by the data subject for the deletion and destruction of personal data within the framework of the rights of the data subject pursuant to Article 11 of the Law is accepted by the Authority.
- the Company rejects the application made by the data subject with the request for the deletion, destruction or anonymization of his personal data, finds the answer insufficient or finds it insufficient in the Law
- the personal data is not responded within the prescribed period of time or in case of filing a complaint to the Board and this request is found appropriate by the Board. In case the maximum period requiring the storage of personal data has expired and the personal data is stored for a longer period of time in the event that there is no condition that justifies long-term retention.

7. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN BY THE COMPANY FOR THE LAWFUL STORAGE AND DISPOSAL OF PERSONAL DATA

Technical and administrative measures are taken by the Company within the scope of adequate measures determined by the Board with the Board Decision dated 31.01.2018 and numbered 2018/10 for special categories of personal data in accordance with Article 12 of the Law and Article 6, paragraph four of the Law for the safe storage of personal data, prevention of unlawful processing and access and destruction of personal data in accordance with the law.

7.1. TECHNICAL AND ADMINISTRATIVE MEASURES

- Network Security and Application Security are ensured.
- Access logs are kept regularly.
- Up-to-date anti-virus systems are used.
- Firewalls are used.

- User account management and authorization control system are implemented and monitored.
- The authorizations of employees who change their duties or leave their jobs in this area are removed.
- Improving the Qualifications and Technical Knowledge and Skills of Employees.
- Documents are kept in a locked environment
- Key management is in place
- Necessary security measures are taken for entering and exiting physical environments containing personal data
 - Corporate policies on access, information security, use, storage and disposal have been prepared and implemented
 - Disciplinary arrangements are in place for employees that include data security provisions
 - Training and awareness-raising activities on data security for employees are carried out at regular intervals
 - Confidentiality commitments are made
 - Disclosure obligation is fulfilled

8. Destruction Techniques for Deletion, Destruction and Anonymization of Personal Data

Destruction lists are created for the persons involved in the destruction process. The destruction is recorded in the computer environment. Documents related to destruction are kept.

Electronic Medium	Non-Electronic Medium
<p>Servers:</p> <ul style="list-style-type: none"> • Periodic backups are automatically deleted by the system as they expire • Data whose retention period has expired is deleted by the system administrator under the supervision of the commission <p>Mobile devices:</p> <ul style="list-style-type: none"> • When users leave the company, their accounts are frozen/deleted and access is immediately blocked. <p>Camera recordings are deleted by the system from old to new as the disk size fills up.</p> <p>Personal computers belong to the company and when the personnel leave, they are reinstalled and all data on the device is cleaned.</p>	<p>The personal data kept in physical environment and those whose retention period has expired are rendered inaccessible and non-reusable in any way by the persons involved in the data retention and destruction process.</p> <p>In addition, the blackout process is also applied by scratching/painting/erasing in such a way that it cannot be read.</p> <p>The personal data in paper media that expire after the expiration of the retention period are destroyed irreversibly by burning or tearing.</p>

8.1. PERSONS INVOLVED IN THE PROCESS OF STORING AND DESTROYING PERSONAL DATA

All units and employees of the Company actively support the responsible units in taking technical and administrative measures to ensure data security in all environments where personal data is processed in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to ensure that personal data is stored in accordance with the law, with the proper implementation of the technical and administrative measures taken by the responsible units within the scope of the Policy, training and awareness of the unit employees, monitoring and continuous supervision.

8.2. STORAGE AND DISPOSAL PERIODS TABLE

Data Category	Processing Purpose	Storage Period	Destruction Period
Identification, Personnel File, Contact,	Execution of Goods/ Service Procurement Processes	10 years after the conclusion of the legal relationship	At the first periodic destruction following the end of the storage period
Identification, Contact	Execution of Goods / Service Sales Processes	10 years after the conclusion of the legal relationship	At the first periodic destruction following the end of the storage period
Identification, Contact, Customer Transaction	Execution of Customer Relationship Management Processes	10 years after the conclusion of the legal relationship	At the first periodic destruction following the end of the storage period
Identification, Contact	Execution of Goods / Service Sales Processes	10 years after termination of employment	At the first periodic destruction following the end of the storage period
Identification	Conducting Training Activities	10 years after the conclusion of the legal relationship	At the first periodic destruction following the end of the storage period
Identification, Contact, Professional experience, Sensitive personal data, Criminal record	Ensuring the Security of Data Controller Operations	10 years after termination of employment	At the first periodic destruction following the end of the storage period
Security of Physical Space, Biometric Data	Creating and Tracking Visitor Registrations	2 years after the visit	At the first periodic destruction following the end of the storage period
Identification, Contact, Personnel File	Creating and Tracking Participant Records	10 years after termination of employment for the employee / 2 years after the end of the training for the trainer	At the first periodic destruction following the end of the storage period

Identification, Contact	Conducting employee satisfaction and loyalty processes / Conducting activities for customer satisfaction	For the employee 10 years after termination of employment / for others 2 years from the date of the meeting	At the first periodic destruction following the end of the storage period
Identification, Contact	Ensuring the security of movable property and resources	10 years after termination of employment	At the first periodic destruction following the end of the storage period
Identification	Execution of Customer Relationship Management Processes	10 years after the conclusion of the legal relationship	At the first periodic destruction following the end of the storage period
Security of Physical Space	Ensuring the security of physical space	3 Months	At the first periodic destruction following the end of the storage period
Identification, Contact	Conducting activities for customer satisfaction	10 years after the conclusion of the legal relationship	At the first periodic destruction following the end of the storage period
Personnel File, Identity, Contact, Finance	Conducting Training Activities	10 years after termination of employment for the employee / 2 years after the end of the training for the trainer	At the first periodic destruction following the end of the storage period
Identification, Contact	Fulfillment of Employment Contract and Regulatory Obligations for Employees	10 years after termination of employment for the employee / 2 years after the end of training for others	At the first periodic destruction following the end of the storage period
Identification, Health Information, Contact	Conducting Occupational Health / Safety Activities	15 years after termination of employment	At the first periodic destruction following the end of the storage period
Identification, Contact, Personal, Health, Finance, Transaction Security	Fulfillment of Employment Contract and Regulatory Obligations for Employees	10 years after termination of employment	At the first periodic destruction following the end of the storage period
Personnel File	Controlling the Entry and Exit to the Institution Building and Preventing Unauthorized Entry and Exit, Execution of human resources processes	10 years after termination of employment	At the first periodic destruction following the end of the storage period

Contact	Ensuring physical space security / Personnel entry and exit control	10 years after termination of employment	At the first periodic destruction following the end of the storage period
Health Information	Execution of activities in accordance with the legislation	15 years after termination of employment	At the first periodic destruction following the end of the storage period
Personnel File	Execution of performance evaluation processes	10 years from termination of employment	At the first periodic destruction following the end of the storage period
Identification, Contact	Employee candidate / Intern / Managing Student Selection and Placement Processes	2 Years	At the first periodic destruction following the end of the storage period
Identification, Contact	Carrying out the application processes of employee candidates	2 Years	At the first periodic destruction following the end of the storage period
Identification, Contact	Employee candidate / Intern / Managing Student Selection and Placement Processes	2 years after the end of the internship	At the first periodic destruction following the end of the storage period

9. PERIODIC DESTRUCTION PERIODS

Pursuant to Article 11 of the Regulation, the Authority has set the period for periodic destruction as 6 months. Accordingly, periodic destruction is carried out in January and July every year in our Company.

10. PUBLICATION AND STORAGE OF THE POLICY

The Policy is published in two different media, wet signed (hardcopy) and electronic media, and disclosed to the public on the website. A hard copy is also kept at the senior management.

11. PERIOD FOR UPDATING THE POLICY

The policy is reviewed as needed and the necessary sections are updated.