GENEKS MÜMESSİLLİK VE TİCARET LİMİTED ŞİRKETİ
PERSONAL DATA STORAGE AND DESTRUCTION POLICY

Introduction

- This personal data storage and destruction policy ('Policy') sets out the general framework of personal data storage and destruction activities carried out by Geneks Mümessillik ve Ticaret Limited Şirketi (hereinafter referred to as **"Geneks"**).
- The principles and procedures regarding the storage and destruction of personal data are regulated within the framework of the Law on Protection of Personal Data No. 6698 ('KVKK'), the Regulation on Deletion, Destruction or Anonymisation of Personal Data published in the Official Gazette dated 28 October 2017 and numbered 30224 and other secondary legislation.
- If you have any questions within the framework of this Policy, or if you have any doubts that this Policy is not acted in accordance with this Policy, or if you have any requests and notifications under the Law on the Protection of Personal Data and/or this policy, you can contact us at ***"muhasebe@geneks.com".***

Scope

- Geneks collects, processes, and stores various types of personal data, including personal data of current, former or potential clients, agents, intermediary organisations, suppliers, subcontractors, service providers and their managers and employees, business partners, company partners, employees, prospective employees, interns, visitors, employees of public institutions and organisations and private law legal entities and relevant third parties.
- This personal data may be processed electronically, either on paper or through servers, databases, websites, cloud solutions, e-mail systems, security copies and/or other media, including storage and processing media belonging to Geneks' data processors.
- Personal data are stored only by taking the necessary administrative and technical measures regulated within the framework of the relevant legislation if necessary for the purposes of processing. The storage and deletion of personal data is carried out in accordance with the procedures and principles and basic rules regulated in this Policy.
- In order to prevent excessive storage of data, personal data is constantly reviewed and certain time limits are set for deletion. In the event that the relevant information is not needed, this information is deleted or anonymised in such a way that the identity of the person concerned cannot be determined. Pursuant to Article 6 of this Policy, personal data may be deleted before the retention period expires.
- The duration for which data can be stored is generally dependent on the purpose of data use and Geneks's processing obligations, as well as other legal requirements, official obligations, or accepted commercial/legal/industry pract
- Access to personal data is also limited to Geneks employees (or third parties who are authorised to access as a processor), where access to the relevant data is necessary for the realisation of the relevant processing purpose.

Definitions

The definitions of some important legal terms related to personal data are as follows:

Explicit consent	Consent on a particular subject, based on information and freely given by the persons concerned.
Anonymisation	Personal data cannot be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Relevant person	Natural person whose personal data is processed.
Destruction	Deletion, destruction or anonymisation of personal data from all kinds of media.
Personal data	Any information relating to an identified or identifiable natural person (‘’relevant person‘’) such as name, surname, Turkish Republic Identity Number, location information.
KVKK (Law on Protection of Personal Data)	Law on the Protection of Personal Data dated 24 March 2016 and numbered 6698.
Processing of Personal Data	All kinds of operations performed on personal data such as obtaining, recording, storing, preserving, amending, reorganising, 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 they are part of any data recording system.
Data Processor	A natural or legal person who processes personal data on behalf of the data controller based on the authorisation granted by the data controller.
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.
Regulation	Regulation on Deletion, Destruction or Anonymisation of Personal Data published in the Official Gazette dated 28 October 2017.

Storage and Processing of Personal Data

- The purpose of data processing and its legal basis will vary depending on which areas and departments within Geneks carry out the data processing activities. The same applies to the necessary data processing and storage durations for the relevant personal data.
- Below are the explanations regarding the general framework for storing personal data

and the storage durations determined for selected departments and business areas within Geneks.

- If a data subject requests the exercise of their right to deletion, and if fulfilling that request is mandatory under the framework of the Personal Data Protection Law (KVKK), the request will be fulfilled by Geneks. In such cases, a detailed review of the personal data being processed may be required.
- Before deleting personal data, the legal basis for processing and storing that data will be taken into account.

Legal Reasons Requiring the Storage of Personal Data

- Personal data processed by Geneks may be stored for a longer period if legally required. In this context:

- Law No. 6698 on the Protection of Personal Data
- Turkish Law of Obligations No. 6098
- Law No. 5510 on Social Security and General Health Insurance,
- Law No. 6331 on Occupational Health and Safety
- Labour Law No. 4857
- Law No. 6502 on Consumer Protection
- Other secondary regulations in force pursuant to these laws

the storage periods stipulated under the above-mentioned laws are also taken into consideration.

Processing Purposes Requiring Storage

- Geneks stores personal data processed within the framework of its activities for the following purposes;
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- Fulfillment of the purpose required for the execution of the employment contract,
- Approval of employee leave, viewing of remaining leave balances, and arrangement of leave schedules,
- Handling of employee termination procedures,
- Processing of payroll transactions,
- Payment of salaries to employees,
- Compliance with the obligations set forth by the Labor Law, Occupational Health and Safety Law, Social Security Law, and other related laws and regulations,
- Creation of employee personnel files,
- Notifications to the Social Security Institution (SGK), Turkish Employment Agency (İŞKUR), police reports, and providing information regarding incentives and legal obligations,
- Opening of accounts for mandatory individual retirement insurance,
- Monitoring of employee recruitment and termination records,
- Providing information and making payments related to wage garnishments in enforcement cases.
- Legal notifications of workplace accidents,
- Execution of occupational health and safety procedures,
- Compliance with information storage, reporting, and notification obligations required by regulations, relevant regulatory authorities, and other authorities,
- Enforcement of court rulings,
- Ensuring security within the company,
- Ensuring workplace safety,

- Managing entry and exit to the company premises and its extensions,
- Distinguishing between justified/unjustified customer complaints, enhancing customer satisfaction, understanding customer needs, and improving customer-related processes,
- Evaluating customer satisfaction and providing training to employees,
- Managing the company, conducting business operations, and implementing company policies,
- Processing reimbursements to employees,
- Maintaining communication with employees,
- Verifying that an employee assigned or allowed to drive a company vehicle is licensed and has not lost their license for any reason,
- Providing vehicles to employees and arranging parking spaces,
- Facilitating the printing of business cards.
- Ensuring the delivery of packages received via cargo or courier to the relevant employee,
- Monitoring the use of company vehicles for employee safety and business operations,
- Organising transportation and travel services,
- Entering employee data into the system of the email service provider to create a business email account,
- Recording documents collected during the employee's application and interview process,
- Facilitating communication for celebratory purposes,
- Planning training, reporting on training sessions, preparing training certificates, tracking employees who participated in the training, and monitoring their development processes based on the training received.
- Ensuring quality control,
- Establishing communication with relevant individuals in emergency situations,
- Providing support to company employees,
- Analysing customer satisfaction surveys,
- Conducting risk management and quality improvement activities,
- Monitoring and preventing unauthorised and unlawful activities,
- Ensuring the highest level of data security,
- Contacting Personal Data Owners who have submitted requests or complaints,
- Providing information to authorised persons, institutions, and organisations as required by legislation,
- Ensuring general security and taking necessary precautions, creating, and tracking visitor logs,
- Conducting the purchase and sale of goods and services,
- Managing invoicing processes,
- Receiving payments and processing refunds.

Reasons Requiring Destruction

- Personal data is deleted, destroyed, or anonymized ex officio and/or upon the request of the data subject in the following circumstances:
- Amendments or repeal of the relevant legislative provisions that form the basis for processing,
- The purpose that requires the processing or storage of personal data no longer exists,
- In cases where personal data is processed solely based on explicit consent, the data subject withdraws their consent,

- The request for deletion or destruction of personal data, made by the data subject under Article 11 of the Law on Protection of Personal Data (KVKK), is accepted by Geneks,
- The maximum storage period for personal data has expired, and there is no condition justifying the continued storage of the data.

Storage and Destruction Periods:

- **Storage Periods:**

Identity (Name and surname, Mother's and father's name, Mother's maiden name, Date of birth, Place of birth, Marital status, Identity card serial number, Turkish ID number, etc.)	10 years from expiry of the contract
Contact (Address no, E-mail address, Contact address, Registered electronic mail address (KEP), Telephone no etc.)	10 years from expiry of the contract
Personnel (Payroll information, Disciplinary investigation, Employment records, Property declaration information, CV information, Performance evaluation reports, etc.)	10 years from expiry of the contract
Legal Act (Information in correspondence with judicial authorities, information in the case file, etc.)	10 Years
Customer Transaction (Call centre records, invoice, promissory note, cheque information, order information, request information, etc.)	10 Years
Professional Experience (Diploma information, Courses attended, On-the-job training information, Certificates, Transcript information, etc.)	10 years from expiry of the contract
Health Information (Health data, blood group information, private health insurance policy and the information contained in this policy, health reports, on-the-job health report, chest X-ray, hearing test, eye test, recruitment and periodic examination forms signed by the workplace physician, pregnancy status, pregnancy report, health, and maternity leave information)	• 10 years from expiry of the contract
• **Criminal Conviction and Security Measures** (Information on criminal conviction, information on security measures, etc.)	• 10 years from expiry of the contract

- **Destruction Periods:**

- Personal data processed by Geneks will be destroyed within a reasonable period of time following the expiry of the above-mentioned storage period.

- TECHNICAL AND ADMINISTRATIVE MEASURES
- **Technical and administrative measures shall be taken by Geneks within the framework of adequate measures determined and announced by the Board for special categories of personal data pursuant to 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.

- **Technical Measures**

- The technical measures taken by Geneks regarding the personal data it processes are listed below:

  - Network security and application security are ensured.
  - Closed system network is used for personal data transfers through the network.
  - Key management is implemented.
  - Security measures are taken within the scope of procurement, development and maintenance of information technology systems.
  - Corporate policies on access, information security, use, storage and destruction have been prepared and started to be implemented.
  - Up-to-date anti-virus systems are used.
  - Firewalls are used.
  - Personal data is backed up and the security of backed up personal data is also ensured.
  - User account management and authorisation control system is implemented and these are also monitored.
  - Log records are kept without user intervention.
  - If sensitive personal data is to be sent via electronic mail, it is sent encrypted and using KEP or corporate mail account.
  - Secure encryption / cryptographic keys are used for sensitive personal data and managed by different units.
  - Attack detection and prevention systems are used.
  - Cyber security measures have been taken and their implementation is constantly monitored.
  - Encryption is performed.
  - Sensitive personal data transferred in portable memory, CD, DVD media are transferred by encrypting the data.
  - Data loss prevention software is used.

- **Administrative Measures**

- The administrative measures taken by Geneks regarding the personal data it processes are listed below:
  - Confidentiality undertakings are executed.
  - The authorisations of employees who change their duties or leave their jobs in this area are removed.
  - Personal data security policies and procedures have been determined.
  - Personal data security is monitored.
  - Necessary security measures are taken for entry and exit to physical environments containing personal data.
  - Physical environments containing personal data are secured against external risks (fire, flood, etc.).
  - Security of environments containing personal data is ensured.
  - Personal data is minimised as much as possible.
  - Existing risks and threats have been identified.
  - Protocols and procedures for the security of special categories of personal data have been determined and implemented.

- Signed contracts contain data security provisions.
- Extra security measures are taken for personal data transferred via paper and the relevant document is sent in confidentiality-grade document format.
- An authorisation matrix has been established for employees.
- Awareness of data processing service providers is ensured.

- PERSONAL DATA DESTRUCTION TECHNIQUES

- **At the end of the period stipulated in the relevant legislation or the retention period required for the purpose for which they are processed, personal data are destroyed by Geneks ex officio and / or upon the application of the person concerned, in accordance with the provisions of the relevant legislation, by the following techniques.**
    - **Deletion of Personal Data**
- Personal data are deleted by the methods given in the table below.

• Data Recording Media	• Explanation
• **Personal Data on Servers**	• For the personal data on the servers, deletion is made by the system administrator by removing the access authorisation of the relevant users for those whose storage period has expired.
• **Personal Data in Electronic Media**	• The personal data stored in electronic media, which expire after the period of time required for their storage, are made inaccessible and non-reusable in any way for other employees (relevant users) except the database administrator.
• **Personal Data in Physical Environment**	• For the personal data kept in physical environment, those whose period of storage has expired are rendered inaccessible and non-reusable in any way for other employees, except for the unit manager responsible for the document archive. In addition, the blackout process is also applied by scratching/painting/erasing in such a way that it cannot be read.

• **Personal Data on Portable Media**	• The personal data kept in Flash-based storage media and those whose period of retention has expired are encrypted by the system administrator and access authorisation is given only to the system administrator and stored in secure environments with encryption keys.

- **Destruction of Personal Data**

- Personal data are destroyed by the methods given in the table below.

• **Data Recording Media**	• **Explanation**
• **Personal Data in Physical Media**	• Those of the personal data in paper media whose period of retention has expired are irreversibly destroyed in paper shredders.
• **Personal Data in Optical/Magnetic Media**	• Physical destruction of personal data on optical media and magnetic media, such as melting, incineration or pulverisation of personal data that expire after the expiry of the retention period, is applied.

- **Anonymisation of Personal Data**

- Anonymisation of personal data means making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if the personal data is matched with other data.
- In order for personal data to be anonymised; personal data must be rendered impossible to be associated with an identified or identifiable natural person, even by using appropriate techniques for the recording medium and the relevant field of activity, such as the return of personal data by the data controller or third parties and / or matching the data with other data.
- Amendments and updates
- **This Policy is reviewed as needed and the necessary sections are updated and announced on Geneks' website** www.geneks.com.