

1	PERSONAL DATA STORAGE AND DISPOSAL POLICY	Reference No	1
		Version No	1.0
		Release Date	*****
		Revision Date	*****
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KALE CARE CHEMICALS KİMYEVİ MADDELER ANONİM ŞİRKETİ

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PERSONAL DATA STORAGE AND DISPOSAL POLICY

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1. INTRODUCTION

1.1. Aim

The Personal Data Storage and Disposal Policy (“**Policy**”) has been prepared in order to determine the procedures and principles regarding the works and processes regarding the storage and disposal activities carried out by **KALE CARE CHEMICALS KİMYEVİ MADDELER ANONİM ŞİRKETİ** (“**KALE CARE**”).

In line with the mission, vision and basic principles determined in the Strategic Plan, KALE CARE has prioritized the processing of personal data belonging to KALE CARE employees, employee candidates, service providers, subcontractors, service recipients, visitors and other third parties in accordance with the Constitution of the Republic of Turkey, international conventions, the Personal Data Protection Law No. 6698 (“**Law**”) and other relevant legislation, and ensuring that the relevant persons use their rights effectively.

Works and processes regarding the storage and disposal of personal data are carried out by KALE CARE in accordance with the Policy prepared in this direction.

1.2. Scope

Personal data belonging to KALE CARE employees, employee candidates, service providers, subcontractor employees, service recipients and guardians, visitors and other third parties are within the scope of this Policy, and this Policy applies to all recording media where personal data owned or managed by KALE CARE is processed, and activities for personal data processing.

1.3. 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 particular subject, based on information and expressed with free will.
Anonymization	Making personal data incapable of being associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Employee	Insured personnel of KALE CARE CHEMICALS KİMYEVİ MADDELER ANONİM ŞİRKETİ.
Electronic Environment	Environments where personal data can be created, read, changed and written by electronic devices.
Non-Electronic Environment	All other environments, such as written, printed, visual environments, other than electronic environments.
Service Provider	A natural or legal person who provides services to KALE CARE under a certain contract.

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Relevant Person	The natural person whose personal data is processed.
Relevant User	Persons who process personal data within the organization of the data controller or in line with the authorization and instruction received from the data controller, excluding the person or unit responsible for the technical storage, protection and backup of the data.
Disposal	Deletion, destruction or anonymization of personal data.
Law	Personal Data Protection Law No. 6698.
Recording Environment	Any environment where personal data is processed fully or partially by automatic means or by non-automatic 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 created by data controllers 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, the data category, the recipient group and the data subject group, in which data controllers detail the maximum retention period required for the purposes for which personal data is processed, the personal data envisaged to be transferred to foreign countries, and the measures taken regarding data security.
Processing of Personal Data	All kinds of operations performed on data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data fully or partially by automatic means or by non-automatic means, provided that it is part of any data recording system.
Sensitive Personal Data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothing, membership in associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
Periodic Disposal	The deletion, destruction or anonymization process, which will be carried out ex officio at repetitive intervals and specified in the personal data storage and disposal policy, in case all of the personal data processing conditions in the law disappear.
Policy	Personal Data Storage and Disposal Policy
Data Processor	The natural or legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller.

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Data Recording System	The recording system in which personal data is processed and structured 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.
Data Controller Registry Information System (VERBIS)	An information system established and managed by the Presidency, accessible over the internet, to be used by the data controllers in the application to the Registry and other transactions related to the Registry.
Regulation	Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28 October 2017.

2. DISTRIBUTION OF RESPONSIBILITIES AND DUTIES

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

The distribution of the titles, units and job descriptions of those involved in the storage and disposal processes of personal data is given in the table below.

TITLE	UNIT	DUTY
Chairman of the Board	Board of Directors	Responsible for the employees and all units to act in accordance with the policy.
Contact Person	-	Responsible for the follow-up of VERBIS records and the communication to be established between the KVK Authority and KALE CARE.
Information Technologies Manager	Information Technologies	Responsible for providing the technical solutions needed in the implementation of the Policy.
<ul style="list-style-type: none"> • Administrative Affairs • Human Resources 	Other Units	Responsible for the execution of the Policy in accordance with its duties.

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<ul style="list-style-type: none"> • Accountancy and Finance, • Sales and Marketing • Procurement and Import • Customer Service • Marketing • R&D 		
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3. RECORDING ENVIRONMENTS

Personal data is stored safely by KALE CARE in the environments listed in the table below, in accordance with the law.

Electronic Environments	Non-Electronic Environments
<ul style="list-style-type: none"> • Servers (Domain, backup, email, database, web, file sharing, etc.) • Software (office software, mobile applications, etc.) • Information security devices (firewall, intrusion detection and prevention, log file, antivirus, etc.) • Personal computers (Desktop, laptop) • Mobile devices (phone, tablet, etc.) • Optical discs (CD, DVD, etc.) • Removable memories (USB, Memory Card, etc.) • Printer, scanner, copier 	<ul style="list-style-type: none"> • Paper, • Manual data recording systems (various forms, visitor logbook, etc.) • Written, printed, visual environments

4. INFORMATION ON DATA STORAGE AND DISPOSAL

Personal data belonging to employees of third parties, institutions or organizations that are in contact as employees, employee candidates, visitors and service providers are stored and disposed of by KALE CARE in accordance with the Law. In this context, detailed explanations regarding storage and disposal are given below, respectively.

4.1. Explanations on Storage

The concept of "*processing of personal data*" is defined in Article 3 of the Law, and it is stated in Article 4 that the processed personal data "*must be related to the purpose for which they are processed, limited and measured, and must be retained for the period required by the relevant legislation or for the purpose for which they are processed*", while "*processing conditions of personal data*" are listed in Articles 5 and 6.

Accordingly, within the framework of the commercial activities, personal data is "*stored for the period stipulated in the relevant legislation or suitable for our processing purposes.*"

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4.1.1. Purposes of Processing Requiring Storage

KALE CARE stores the personal data that it processes within the framework of its activities for the following purposes.

- Carrying out human resources processes.
- Providing corporate communication.
- Informing customers about the services offered.
- Carrying out Occupational Health and Safety processes.
- Being able to perform works and processes as a result of signed contracts and protocols.
- Ensuring the fulfillment of legal obligations as required or mandated by legal regulations.
- Contacting real / legal persons who have a business relationship with KALE CARE.
- Being able to fulfill the burden of proof as evidence in legal disputes that may arise in the future.

4.1.2. Legal Reasons for Storage

Personal data processed within the framework of KALE CARE's activities are retained for the period stipulated in the relevant legislation. In this context, personal data is stored for the specified storage periods within the framework of the following:

- Personal Data Protection Law No. 6698,
- Turkish Law of Obligations No. 6098,
- Turkish Commercial Law No. 6102,
- Law No. 5651 on Regulation of Broadcasts on the Internet and Combating Crimes Committed Through These Broadcasts,
- Occupational Health and Safety Law No. 6331,
- Labor Law No. 4857,
- Other secondary regulations in force pursuant to these laws.

4.2. Explanations on Disposal and Reasons Requiring Disposal

Personal data is deleted, destroyed or deleted, destroyed or anonymized ex officio by KALE CARE upon the request of the relevant person, in the following cases:

- Amendment or repeal of the provisions of the relevant legislation, which are the basis for processing,
- Disappearance of the purpose that requires processing or storage,
- In cases where the processing of personal data takes place only on the basis of explicit consent, withdrawal of the relevant person's explicit consent,

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- According to Article 11 of the Law, acceptance the application made by the relevant person regarding the deletion and destruction of his/her personal data by KALE CARE,
- In the event that KALE CARE rejects the application made by the relevant person with the request for the deletion, destruction or anonymization of personal data, finds the answer insufficient or fails to respond within the time stipulated in the Law, filing of a complaint to the Board and approval of this request by the Board,
- Expiration of the maximum period for storing personal data and absence of conditions that justify storing personal data for a longer period of time.

5. TECHNICAL AND ADMINISTRATIVE MEASURES

For the secure storage of personal data, prevention of unlawful processing and access, and destruction of personal data in accordance with the law, technical and administrative measures are taken by KALE CARE within the framework of adequate measures determined and announced by the KVK Institution for sensitive personal data pursuant to Article 12 of the Law and paragraph 4 of Article 6 of the Law.

5.1. Technical Measures Taken

The technical measures taken by KALE CARE regarding the personal data that it processes are listed below:

- Establishing an access management process to prevent unauthorized access to personal data,
- Establishing classification and event management processes related to data protection,
- Establishing a vulnerability scanning process for detecting security vulnerabilities in recording environments where personal data is stored and taking actions,
- Using necessary solutions to prevent malicious software from accessing KALE CARE network,
- Determining the risks to prevent the unlawful processing of personal data,
- Ensuring that technical measures are taken in accordance with these risks and technical controls are carried out for the measures taken,
- Taking the necessary measures to ensure that the deleted personal data is inaccessible and non-reusable for the relevant users.

5.2. Administrative Measures Taken

The administrative measures taken by KALE CARE regarding the personal data that it processes are listed below:

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- Before starting to process personal data, fulfilling the obligation to inform the relevant persons and obtaining their explicit consent, when necessary,
- Signing the necessary and sufficient information security, confidentiality and personal data protection provisions with third party contacts with which KALE CARE has contractual relations in commercial and non-commercial business and relations,
- Publishing the Personal Data Storage and Disposal Policy,
- Publishing a general informative clarification text on the KALE CARE website,
- Analyzing the activities and processes within KALE CARE within the scope of compliance with the law and determining the actions to be taken in order to comply with the law,
- Creating the Personal Data Inventory,
- Providing trainings on preventing unlawful processing of personal data, preventing unlawful access to personal data, and ensuring the protection of personal data, in order to improve the awareness of personal data security of employees.

6. PERSONAL DATA DISPOSAL TECHNIQUES

At the end of the storage period required for the period stipulated in the relevant legislation or for the purpose for which they are processed, personal data is disposed of by KALE CARE ex officio or upon the application of the relevant person, again in accordance with the provisions of the relevant legislation, with the following techniques.

6.1. Deletion of Personal Data

Personal data is deleted by the methods shown below.

Data Recording Environment	Description of the Process
Personal Data on Servers	The system administrator removes the access authorization of the relevant users and deletes the personal data on the servers for those whose storage period has expired.
Personal Data in Electronic Environment	Among the personal data in the electronic environment, the ones whose storage period has expired are rendered inaccessible and non-reusable for other employees (relevant users) except the database administrator.
Personal Data in Physical Environment	Personal data stored in the physical environment is rendered inaccessible and non-reusable in any way for those whose period has expired. In addition, the process of spoliation is applied by drawing/painting/erasing in a way that the text cannot be read.
Personal Data in Portable Media	Among the personal data stored in flash-based storage media, the ones whose storage period has expired are encrypted by the system

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	administrator and the access authorization is given only to the system administrator, and they are stored in secure environments with encryption keys.
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6.2. Destruction of Personal Data

Personal data is destroyed by KALE CARE with the methods given below.

Data Recording Environment	Description of the Process
Personal Data in Physical Environment	Among the personal data in the paper environment, the ones whose storage period has expired are irreversibly destroyed in the paper shredders.
Personal Data in Optical/Magnetic Media such as CD, USB	The physical destruction of the personal data in optical media and magnetic media whose storage period has expired, such as melting, burning or pulverizing, is applied. In addition, magnetic medium is passed through a special device, and the data on it is rendered unreadable by exposing it to a high magnetic field.

6.3. Anonymization of Personal Data

Anonymization of personal data is ensuring that personal data cannot be associated with an identified or identifiable natural person under any circumstances, even if it is matched with other data.

In order for personal data to be anonymized, personal data must be rendered unrelated to an identified or identifiable natural person, even by using appropriate techniques for the recording medium and the relevant field of activity, such as returning the personal data by the data controller or third parties and/or matching the data with other data. In this context, KALE CARE makes use of the anonymization methods in the guidelines published by the Personal Data Protection Authority for personal data whose purpose of processing has disappeared.

7. STORAGE AND DISPOSAL TIMES

7.1. Periodic Disposal Time

In accordance with Article 11 of the Regulation on the Deletion, Destruction or Anonymization of Personal Data, KALE CARE has determined the periodic disposal time as 6 months. Accordingly, KALE CARE, in parallel with the Personal Data Inventory, undertakes to periodically check the personal data it keeps in its digital and physical media, at least once every 6 months (180 days), and to delete, destroy or anonymize the said data ex officio at repetitive intervals when the purpose for which they are processed disappears.

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7.2. Table of Process-Based Storage and Disposal Times

Regarding the personal data being processed by KALE CARE within the scope of its activities,

- Storage times on the basis of personal data for all personal data within the scope of activities carried out in connection with processes are included in the Personal Data Processing Inventory,
- Storage times on the basis of data categories are included in the VERBIS records,
- Storage times on the basis of processes are included in the Personal Data Storage and

Disposal Policy.

Updates are made on the said storage periods, if necessary. The deletion, destruction or anonymization of personal data whose storage period has expired is carried out by the authorized units of KALE CARE.

PROCESS	STORAGE TIME	DISPOSAL TIME
KALE CARE's customers and transactions	10 years from the date of termination of the purpose of processing	At the first periodic disposal time following the end of the storage time
Transactions made on the website	2 years from the date of termination of the purpose of processing	At the first periodic disposal time following the end of the storage time
Conclusion of contracts	10 years from the date of termination of the purpose of processing	At the first periodic disposal time following the end of the storage time
Fulfillment of obligations arising from OHS legislation	15 years from the date of termination of the purpose of processing	At the first periodic disposal time following the end of the storage time
Execution of procurement and financial affairs processes	10 years from the date of termination of the purpose of processing	At the first periodic disposal time following the end of the storage time
Execution of human resources processes and execution of employment contracts	10 years from the date of termination of the purpose of processing	At the first periodic disposal time following the end of the storage time
Documents kept in personal files	10 years from the date the employee leaves the job	At the first periodic disposal time following the end of the storage time

Health reports	15 years from the date the employee leaves the job	At the first periodic disposal time following the end of the storage time
Audiovisual recordings	2 years	At the first periodic disposal time following the end of the storage time
CCTV camera recording system footage	90 days	Automatic disposal
Execution of job application evaluation processes	2 years	At the first periodic disposal time following the end of the storage time
Execution of invoicing and archive processes	10 years	At the first periodic disposal time following the end of the storage time
Control and follow-up of procurement processes	10 years	At the first periodic disposal time following the end of the storage time
Keeping visitor records	2 years	At the first periodic disposal time following the end of the storage time

8. PUBLISHING AND KEEPING THE POLICY UP-TO-DATE

The policy can be published in two different environments, with wet signature (printed paper) and electronically, and is disclosed to the public on the website of KALE CARE in accordance with the decision to be made by the Company. Public disclosure is not obligatory. The printed paper copy is also kept in the company database and accessible to everyone.

The policy is reviewed as needed and the necessary sections are updated. The current version of the Policy will be valid as of the announcement to be made on KALE CARE's website and upload to the company database.

9. ENFORCEMENT OF THE POLICY

The policy is deemed to have entered into force after its announcement within the Company. In the event that it is decided to be annulled, the old copies of the Policy with wet signatures are canceled and signed (with the cancellation stamp or written cancellation) and stored in the company database for at least 5 years.