




**MAKİNE VE KİMYA ENDÜSTRİSİ A.Ş.**

## **PERSONAL DATA STORAGE AND DISPOSAL INSTRUCTION**

<b>Document No.</b>	<b>KSY-TLM-005</b>
<b>Revision No.</b>	<b>00</b>
<b>Revision Date</b>	<b>-</b>
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## 1. PURPOSE

The Personal Data Storage and Disposal Instruction ("Instruction") has been prepared to determine the procedures and principles regarding the business and transactions concerning the storage and destruction of data within the scope of the Personal Data Protection Law No. 6698, of Makine ve Kimya Endüstrisi Anonim Şirketi (hereinafter referred to as "MKE A.Ş." or "Data Controller").


## 2. SCOPE

It covers natural persons whose personal data are processed in the units of MKE A.Ş., as well as natural and legal persons who process personal data wholly or partially by automated means or non-automated means provided that it forms part of any data filing system.

## 3. DEFINITIONS and ABBREVIATIONS

### 3.1. Definitions

Explicit consent	Freely given, specific and informed consent
Law No. 6698	Personal Data Protection Law
Personal data	Any information relating to an identified or identifiable natural person
Processing of personal data	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof
User	Everyone using MKE A.Ş.'s information resources
Company	Makine ve Kimya Endüstrisi Anonim Şirketi
Mobile Devices	Portable computers, mobile phones, smartphones, tablets, etc.
Database	A collection of data organized in a way that can be easily accessed, managed, and updated. A database keeps records of all information belonging to software (product information, user information, sales and purchase information, accounting, and document information, etc.).
Data Filing System	The filing system where personal data are processed by being structured according to specific criteria

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Recording Medium	Any type of environment that keeps the personal data processed wholly or partially by automated means or non-automated means which provided that form part of a data filing system
Data Processor	The natural or legal person who processes personal data on behalf of the data controller upon its authorization
Data Controller's Registry Information System (VERBIS)	Information system that is accessible through the Internet, established and managed by the Presidency, that data controllers will use for the registration with the Registry and the other operations related to the Data Controllers' Registry kept by the Presidency of Personal Data Protection Authority of Türkiye
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 filing system

### 3.2. Abbreviations

EBYS	Electronic Document Management Systems
Authority	Personal Data Protection Authority

## 4. RESPONSIBILITIES


- 1) The Legal Directorate is responsible for the preparation and revision of this instruction.
- 2) The Quality Directorate (Quality Systems Management) is responsible for the publication of this instruction in the MKE A.Ş. Quality Management System (QMS) software.
- 3) The Legal Directorate is responsible for its implementation.

## 5. REFERENCED AND CITED DOCUMENTS AND FORMS

### 5.1. Referenced Documens:

- (1) Personal Data Protection Law No. 6698
- (2) TS ISO/IEC 27001:2013 Information Technology – Security Techniques – Information Security Management Systems – Requirements
- (3) Law on Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications No. 5651
- (4) By-Law on Erasure, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28.10.2017 and numbered 30224



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(5) By-Law on State Archival Services published in the Official Gazette dated 18.10.2019 and numbered 30922

(6) By-Law on Procedures and Principles to be Applied in Official Correspondence published in the Official Gazette dated 10.06.2020 and numbered 31151

## 5.2. Cited Documents:

- (1) MKE A.Ş. Personal Data Processing and Protection Instruction (KSY-TLM-006)
- (2) MKE A.Ş. Personal Data Processing Inventory Management Procedure (KSY-KSP-018)<sup>1</sup>
- (3) MKE A.Ş. Standard File Plan
- (4) MKE A.Ş. Data Subject Application Form (KSY-FRM-026)

## 6. IMPLEMENTATION

The "Protection of Personal Data Law" No. 6698, dated 24/03/2016, aims to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data, and to regulate the obligations and rules to be complied with by natural and legal persons who process personal data. If personal data must be processed as per legislation, they are processed in accordance with the rules. Decisions of the Personal Data Protection Authority Board and changes in the law are considered in doing so.

All employees of MKE A.Ş. are obliged to support the persons responsible for taking all administrative and technical measures required to fulfill the Data Controller's obligations regarding the security of personal data and for carrying out the processes included in this Instruction, and for carrying out the necessary work.

The senior manager of each unit is responsible for taking all kinds of measures and carrying out the necessary work required to fulfill the obligations regarding the storage and disposal of personal data in compliance with the relevant legislation by ensuring personal data security.


### 6.1. Storage of Personal Data

When determining the personal data storage period, the obligations brought by legal regulations such as the "Regulation on State Archival Services," the "Regulation on Procedures and Principles to be Applied in Official Correspondence," and the "Standard File Plan of the Presidency of State Archives"<sup>2</sup> are taken into consideration. Outside of legal regulations, the retention period is determined by taking into account the purposes for which the personal data is processed.

<sup>1</sup> This document is only available in Turkish.

<sup>2</sup> The relevant provisions of this document is provided in the "Common Codes" tab of the "MKE A.Ş. Standard File Plan".



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If the purpose for processing personal data has ended, and the storage periods determined by the relevant legislation and MKE A.Ş. have also been reached, personal data may be stored only to serve as evidence in potential legal disputes or for the purpose of asserting a related right associated with the personal data or establishing a defense. In establishing these periods, storage periods are determined based on the statute of limitations for asserting the aforementioned right and examples from previous requests directed to MKE A.Ş. on the same matters, even after the statute of limitations has passed. In this case, the stored personal data is not accessed for any other purpose and is only accessed when required for use in a legal dispute. If the aforementioned period ends and the data processing purpose ceases to exist, the data is erased, destroyed, or anonymized according to this Instruction, unless there is another legal reason or basis allowing the data to be retained.


## 6.2. Recording Medium of Personal Data

Personal data is stored by MKE A.Ş. in the environments specified below, in compliance with Protection of Personal Data Law No. 6698.

<b>Electronic Environment</b>	<b>Non-Electronic Environment</b>
Servers (domain, backup, e-mail, database, web, file sharing, etc.)	Written, printed, visual media, etc
Software (office software, portal, EDMS, VERBIS, etc.)	Manual data recording systems (survey forms, visitor entry log, etc.)
Network and System security devices (firewall, intrusion detection and prevention, log file, antivirus, etc.)	Locked Cabinets and Folders, etc.
Personal computers (desktop, laptop, etc.)	Archives
Mobile devices (phone, tablet, etc.)	
Optical discs (CD, DVD, etc.)	
Fixed and removable memory (HDD, USB, memory card, etc.)	
Printer, scanner, photocopier, etc.	
Biometric data reading devices, card reading devices, etc.	
Security Camera Recording Media (DVR, CCTV, NVR, etc.)	

## 6.3. Personal Data Storage Conditions

The storage periods of personal data processed by the Company are determined taking into account the provision of “Being stored for the period laid down by relevant legislation or the period required for the

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purpose for which the personal data are processed (Law No. 6698/Article 4)” and are disposed at the end of the relevant periods.

#### a. Legal Regulations Requiring the Storage of Personal Data

The following legal instruments are applied by MKE A.Ş.;


<ul style="list-style-type: none"> <li>• Law on Makine ve Kimya Endüstrisi Anonim Şirketi No. 7330,</li> <li>• Personal Data Protection Law No. 6698,</li> <li>• Law on Pension Fund No. 5434,</li> <li>• Law on Social Insurance and General Health Insurance No. 5510,</li> <li>• Turkish Code of Obligations No. 6098,</li> <li>• Law on Intellectual and Artistic Works No. 5846,</li> <li>• Electronic Signature Law No. 5070,</li> <li>• Law on Regulation of Publications on the Internet and Combatting Crimes Committed Through These Publications No.5651,</li> <li>• Law on Defense Industry Secutiy No. 5202,</li> <li>• Law on Security Investigation and Archive Research No. 7315</li> </ul>	<ul style="list-style-type: none"> <li>• Law on Occupational Health and Safety No. 6331,</li> <li>• Civil Servants Law No. 657,</li> <li>• Labor Law No. 4857,</li> <li>• Criminal Procedure Law No. 5271,</li> <li>• Administrative Procedure Law No. 2577,</li> <li>• Attorneyship Law No. 1136,</li> <li>• Vocational Education Law No. 3308,</li> <li>• By-Law on State Archival Services,</li> <li>• MKE A.Ş. Standard File Plan, prepared in accordance with the Standard File Plan of the Presidency of State Archives,</li> <li>• ISO 27001 Policy, Procedures, and Requirements,</li> <li>• Other relevant legal instruments in force.</li> </ul>
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#### b. Purposes Requiring the Storage of Personal Data

Personal data processed in line with the following processes are stored by MKE A.Ş..

<ul style="list-style-type: none"> <li>• Emergency Management Processes</li> <li>• Information Security Processes</li> <li>• Candidate/Intern/Student Selection and Placement Processes</li> <li>• Candidate Application Processes</li> <li>• Employee Satisfaction and Loyalty Processes</li> <li>• Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees</li> <li>• Fringe Benefits and Other Benefits Processes for Employees</li> <li>• Audit/Ethics Activities</li> <li>• Execution of Training Activities</li> </ul>	<ul style="list-style-type: none"> <li>• Logistics Activities</li> <li>• Goods/Service Procurement Processes</li> <li>• Goods/Service Sales Processes</li> <li>• Goods/Service Production and Operation Processes</li> <li>• Customer Relationship Management Processes</li> <li>• Customer Satisfaction Activities</li> <li>• Organization and Event Management</li> <li>• Marketing Analysis Studies</li> <li>• Execution of Goods / Service Sales Processes</li> <li>• Execution of Goods / Service Production and Operation Processes</li> </ul>
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<ul style="list-style-type: none"> <li>• Execution of Access Authorizations</li> <li>• Execution of Activities in Compliance with Legislation</li> <li>• Execution of Finance and Accounting Affairs</li> <li>• Ensuring Physical Security</li> <li>• Execution of Assignment Processes</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Execution of Internal Audit/Investigation/Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning of Human Resources Processes</li> <li>• Execution / Audit of Business Activities</li> <li>• Execution of Occupational Health / Safety Activities</li> <li>• Receiving and Evaluating Suggestions for the Improvement of Business Processes</li> <li>• Execution of Business Continuation Activities</li> </ul>	<ul style="list-style-type: none"> <li>• Execution of Customer Relationship Management Processes</li> <li>• Execution of Customer Satisfaction Activities</li> <li>• Organization and Event Management</li> <li>• Execution of Marketing Analysis Studies</li> <li>• Execution of Performance Evaluation Processes</li> <li>• Execution of Risk Management Processes</li> <li>• Execution of Storage and Archiving Activities</li> <li>• Execution of Contract Processes</li> <li>• Monitoring of Requests / Complaints</li> <li>• Provision of Security for Movable Goods and Resources</li> <li>• Execution of Supply Chain Management Processes</li> <li>• Execution of Wage / Compensation Policy</li> <li>• Provision of Security for Data Controller Operations</li> <li>• Execution of Talent / Career Development Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> <li>• Execution of Management Activities</li> <li>• Creation and Monitoring of Visitor Records</li> </ul>
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#### 6.4. Disposal of Personal Data

At MKE A.Ş., personal data processed according to the relevant data subject group, within the personal data processing conditions specified in Articles 5 and 6 of Law No. 6698, will be disposed of when:

- The legal regulations that are the reason for processing or storing personal data change or are abolished.
- The purpose for processing or storing personal data ceases to exist.
- The data subject withdraws their explicit consent in cases where personal data is processed or stored based on the condition of explicit consent.
- The application made by the data subject to MKE A.Ş. for the erasure and destruction of personal data is accepted, within the scope of their rights under Article 11 of Law No. 6698.



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- The data subject lodges a complaint with the Authority, and this request is deemed appropriate by the Authority.
- The maximum period requiring the storage of personal data has passed, and there is no reason to justify keeping the personal data for a longer period.

In these situations, MKE A.Ş. will erase, destroy, or anonymize the personal data belonging to the data subject, either through the disposal procedures specified in the "By-Law on State Archival Services" or upon the request of the data subject.

### 6.5. Personal Data Disposal Techniques

Personal data processed by MKE A.Ş. are disposed of ex officio or upon the data subject's application, in accordance with the Law No. 6698, the By-Law on State Archival Services, and other relevant legal regulations, in the ways specified below, upon the expiry of the period stipulated in the relevant legal regulation or the storage period required for the purpose for which they were processed.


#### a. Erasure of Personal Data

The erasure process is performed by MKE A.Ş. by rendering the personal data inaccessible and unusable for the relevant users. MKE A.Ş. takes all necessary technical and administrative measures to ensure that the erased personal data is inaccessible and unusable by the relevant users. The erasure of personal data is carried out in accordance with the principles specified in this Instruction using the following methods:

Recording Medium	Erasure Method
Personal Data on Servers	For personal data on servers whose storage period has ended, the erasure process is performed by the system administrator by revoking the access authorization of the relevant users.
Personal Data in Databases	For personal data in databases whose storage period has ended, the data is rendered inaccessible and unusable by other employees (relevant users), excluding the database administrator
Personal Date in Pyhsical Environments	For personal data held in physical environments whose storage period has ended, the data is rendered inaccessible and unusable by other employees, excluding the unit manager responsible for the document archive.
Personal Data on Portable Media	For personal data held on portable media whose storage period has ended, the data is encrypted by the authorized person processing the data and stored in secure environments with access authorization limited only to that person.

#### b. Destruction of Personal Data

The destruction of personal data is the process of rendering personal data inaccessible, non-recoverable, and unusable by anyone. Personal data is destroyed using the methods provided in the table below.

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Recording Medium	Destruction Method
Written or Printed Documents	Personal data on paper whose storage period has ended are destroyed in paper shredding machines in a way that cannot be recovered.
Servers (ERP, CRM, Domain, backup, e-mail, database, web, etc.)	Relevant data is destroyed from the database and/or files are destroyed unrecoverably using disk cleaning methods. Server disks with high criticality are physically destroyed.
Software	Relevant data is destroyed from the database and/or files are destroyed unrecoverably using disk cleaning methods.
Printer, Scanner, Photocopier, etc.	Data on the disks of the devices are destroyed using disk cleaning methods, and disks with high criticality are directly physically destroyed.
Camera Recording Devices (NVR), Card Reader, Biometric Reader, etc.	Data on the disks of the devices are destroyed using disk cleaning methods. In necessary cases, the storage units on the device are physically destroyed.
Personal Computers	Data on the computer's disks are destroyed using disk cleaning methods, and disks with high criticality are directly physically destroyed.
Personal Data on Portable Media	Data is destroyed by the authorized person processing the data using disk cleaning methods, and memories with high criticality are directly physically destroyed.

### c. Anonymization of Personal Data


MKE A.Ş. shall not perform anonymization of personal data, in principle. In exceptional cases, the provisions of the By-Law on Erasure, Destruction or Anonymization of Personal will be taken account for personal data anonymization techniques.

## 6.6. Storage and Disposal Periods

The storage and disposal periods for personal data are determined in accordance with the provisions of the "MKE A.Ş. Standard File Plan," which is prepared pursuant to the provisions of the Regulation on State Archival Services, and relevant legislation. For personal data that may fall outside this scope, the personal data is stored for the period required for processing the personal data in accordance with MKE's practices and the customs of commercial life, tied to the activity MKE is carrying out while processing that personal data, and is disposed at the end of this period.

## 6.7. Periodic Disposal Period



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The periodic disposal period within the scope of the By-Law on Erasure, Destruction or Anonymization of Personal Data has been determined as twice a year. Accordingly, the periodic disposal process is carried out on the Friday corresponding to the first week of May and November each year.

## 7. EFFECTIVE DATE

This Instruction shall come into effect from the first business day following the approval date on the signature page.

## 8. APPENDICES

There are no appendices.

## 9. REVISION STATUS CHART

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