

**KAHVECİ OTOMOTİV SAN. VE TİC. AŞ.  
STORAGE AND DESTRUCTION POLICY OF  
PERSONAL DATA**



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PRELIMINARY APPROVAL: COMPANY KVKK COMPLIANCE

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REPRESENTATIVE

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EFFECTIVENESS: COMPANY GENERAL MANAGER

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## 1. IDS AND ADS

Recipient Group	Fact that personal data is transferred by the data controller or legal entity category.
Open Consent	Based on being informed of a specific topic and free is the consent announced by will.
Running	Kahveci Otomotiv San. ve Tic. Aş. personnel.
Electronic Media	Personal data can be created with electronic devices, environments where it can be read, modified, and written.
Non-Electronic (Physical) Environment	All written, printed, visual, etc. outside the electronic media. other environments.
Service Provider	Kahveci Otomotiv San. ve Tic. Aş. contract with are natural or legal persons providing services within the framework of the service.
Contact	Personal data are real people processed.
Destruction	Deletion, destruction or anonymization of personal data is the introduction of.
Law	It is the Personal Data Protection Law No. 6698.
Recording Environment	To any environment where personal data is processed in a completely or partially automated way or by non-automated means, provided that it is part of any data recording system is the given name.
Personal Data	Any identity or identifiable person information.
Processing of Personal Data	Obtaining, recording, storing, storing, replacing, rearranging, disclosing, transferring, inheriting personal data by means that are completely or partially automated or not automatic, if they are part of any data recording system, become available. all kinds of actions carried out on data such as being brought in, classified or prevented from being used.
Board	It is the Personal Data Protection Board.
Institution	It is the Personal Data Protection Authority.
Special Quality Personal Data	People's race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, disguise and clothing, association, foundation or union membership, health, sex life, criminal conviction and data and biometric and genetic data related to security measures are specially qualified personal data.
Periodic Destruction	If all the terms of processing of the personal data contained in the law are eliminated, the deletion, destruction or anonymization process specified in the personal data storage and destruction policy and which will be resented at repeated intervals.



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Policy

COFFEE INDUSTRY AND TRADE INC. Personal  
The Data Resining and Destruction Policy.

VERBIS	It is the Register of Data Subjects held by the Presidency of the Personal Data Protection Authority.
Data Processor	A natural or legal person who processes personal data on behalf of the data controller based on the authority given by the data controller.
Data Recording System	It is the recording system in which personal data is processed by configuring it according to certain criteria.
Data Controller	It is the natural or legal person responsible for establishing and managing the data recording system, determining the purposes and means of processing personal data. COFFEE FOR This Policy It means AUTOMOTIVE INDUSTRY AND TRADE INC.
Kahveci Otomotiv	Kahveci Otomotiv San. ve Tic. Aş. expression that's what it's worth
Company	Kahveci Otomotiv San. ve Tic. Aş. expression that's what it's worth
Organization	Kahveci Otomotiv San. ve Tic. Aş. expression that's what it's worth

## 2. PURPOSE AND SCOPE

### 2.1. Purpose

Kahveci Otomotiv San. ve Tic. Aş. The Personal Data Storage and Destruction Policy has been prepared to regulate the principles adopted by Kahveci Otomotiv for the recording phase of the personal data it has processed as data controller and the procedures and principles it applies in the storage and imp as processes of this personal data.

Kahveci Otomotiv is committed to the utmost sensitivity regarding the enforcement of the processing processes of personal data in accordance with the Law and the safe protection of the personal data under its auspices. Accordingly, it strives to continuously improve personal data processing processes in accordance with both local and international regulations and conventions in the field of protection of personal data.

### 2.2. Scope

The scope of this policy is the principles that Kahveci Otomotiv complies with during the process of recording the personal data and the procedures and principles adopted in ensuring and destroying the security of these personal data. In this context, all measures to be taken in order to ensure the security of personal data through all kinds of personal data processing activities carried out by Kahveci Otomotiv and the configuration of the extermination process will be ad to this policy.

## 3. RESPONSIBILITY AND MISSION DISTRIBUTIONS

All units and employees, including Kahveci Otomotiv, are administrative and technical



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for the safety of personal data in the implementation of policies and procedures adopted within the scope of the organization's Personal Data Protection Law and related legislation.

it plays a key role in implementing measures, preventing unlawful processing of personal data, preventing unlawful access to personal data, and implementing organizational policies and procedures in the process of the relevant destruction of personal data.

The "KVKK Compliance Representative", appointed by Kahveci Otomotiv among its employees, ensures that all units and employees of the organization operate in accordance with the organizational policies and procedures and periodically audits them. KVKK Compliance Tehsils reports the violations it detects to the unit supervisors and the general manager of the organization.

The unit supervisors within Kahveci Otomotiv ensure that their units follow the organization's policies and procedures in the field of protection of personal data and ensure the continuity of this compliance. Upon notification of an outlier by the KVKK Compliance Representative, the unit supervisors immediately remove the relevant information.

Kahveci Otomotiv general manager ensures that all units and employees within the organization comply with the organization's policies and procedures in the field of personal data protection and the legislation related to this field. In this context, it provides the products and services that need to be supplied and makes the necessary assignments. Upon notification of an outlier by the KVKK Compliance Representative, the general manager inspects whether the relevant incongruity has been addressed.

Kahveci Otomotiv; Through the general manager, unit supervisors and KVKK Compliance Representation, awareness-raising activities and notifications are implemented for the third parties to which they receive services to fulfill their obligations in the field of personal data protection and to plan and implement measures related to data security.

## **4. PRINCIPLES FOR THE PROCESS OF PERSONAL DATA**

### **4.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH DATA PROCESSING CONDITIONS**

Obtaining personal data by Kahveci Otomotiv by means that are fully or partially automated or not automatic, provided that they are part of any data recording system, in the activities of saving, storing, replacing, reorganizing, disclosing, transferring, inheriting, making available, deletion or preventing the use of the essence; the basic principles mentioned below (4.1.1.) are treated in accordance with the processing conditions (4.1.2.) and the processing requirements of specially qualified personal data (4.1.3.).

#### ***4.1.1. COMPLIANCE WITH THE BASIC PRINCIPLES OF THE PROCESS OF PERSONAL DATA***

All activities within the scope of the processing of personal data by Kahveci Otomotiv adopt the following principles:

*4.1.1.1. Processing Personal Data in Accordance with the Law and Honesty Rule.*

Kahveci Otomotiv, to universal human rights in personal and rial processing activities, T.C in accordance with the Constitution of the Republic of Turkey, the legislation in the field of protection of personal data and the rules of honesty.

*4.1.1.2. Ensuring that processed Personal Data is Accurate and Up to Date When Necessary.*

Kahveci Otomotiv is taking the necessary administrative and technical measures to ensure that the personal data processed is accurate and up to date for the person concerned and to ensure that they are checked regularly by anticipating communication channels for notifications that may come in this direction.

*4.1.1.3. Processing Personal Data for Specific, Clear and Legitimate Purposes.*

Kahveci Otomotiv determines its objectives within the scope of personal data processing activities before the start of the data processing activity and informs the relevant person. It acts in accordance with the legal norms in determining and determining these objectives.

*4.1.1.4. To Ensure the Use of Personal Data in a Connected, Limited and Measured Way for the Purpose for which It Is Processed.*

Kahveci Otomotiv is doing the necessary work to be connected, limited and measured for the purpose of processing the personal data processed. In this context, it acts in accordance with the necessity of reducing the personal data processed as much as possible and does not act on the assumption that it can be used in the future.

*4.1.1.5. Maintaining Personal Data for Periods stipulated in the Relevant Legislation or for Processing purposes.*

Kahveci Otomotiv maintains the periods of storage of the personal data it processes with the periods prescribed in the legislation or the periods linked for processing purposes. If the afroed periods expire or the reason for personal data processing disappears, the relevant personal data is destroyed by deleting, destroying or anonymization.

**4.1.2. COMPLIANCE WITH PROCESSING CONDITIONS FOR THE PROCESSING OF PERSONAL DATA**

In the activities of the processing of personal data by Kahveci Otomotiv, the following conditions are treated in accordance with the conditions stipulated in Article 5 of the Law:

*4.1.2.1. Personal Data Processing in accordance with the Express Consent Requirement of the Person Concerned.*

Personal data is processed by Kahveci Otomotiv with the consent of the personal data subject, which is clear and limited only to the relevant transaction, with sufficient knowledge of the subject.

#### *4.1.2.2. Personal Data Processing based on The Clearly Stipulated Law.*

If clearly stipulated in the law by Kahveci Otomotiv, personal data is processed limited to the purposes and periods stipulated in the law.

#### *4.1.2.3. Personal Data Processing Based on The Legal Reason that the Data Owner's Express Consent cannot be Obtained due to Actual Aimlessness and Personal Data Processing Is Mandatory.*

In cases where kahveci Otomotiv cannot explain the consent of the personal data owner or the consent is not valid, personal data is processed on the basis of this legal reason if it is mandatory to process personal data in order to protect the life or body integrity of the persons.

#### *4.1.2.4. Process the Personal Data of the Contracting Party if it is Directly Related to the Establishment or Execution of Contract.*

Personal data of the contracting party, which is directly in contact with the establishment or fulfillment of a contract by Kahveci Otomotiv, is processed.

#### *4.1.2.5. Processing K-business Data That Is Mandatory for Kahveci Otomotiv to Fulfill Its Legal Obligation.*

The personal data required by Kahveci Otomotiv for the fulfillment of an activity with legal obligations are processed limited to the purpose, shape and duration required by the legal obligation.

#### *4.1.2.6. Processing Personal Data Made Available by the Personal Data Owner.*

Personal data made public by Kahveci Otomotiv by the personal data owner are processed in accordance with the purpose of publicized.

#### *4.1.2.7. Processing Personal Data That Is Mandatory for the Establishment, Exercise or Protecting of a Right.*

Personal data required by Kahveci Otomotiv for the establishment, exercise or protection of a right are processed in parallel with the relevant obligation.

#### *4.1.2.8. Processing Personal Data based on the Reason why Personal Data Processing is Mandatory for the Legitimate Interests of Kahveci Otomotiv, provided that the Data Owner's Fundamental Rights and Freedoms are not authorized.*

Personal data can be processed by Kahveci Otomotiv if personal data processing is mandatory for its legitimate interests and the basic rights and freedoms of the data owner will not be harmed. Here, the criteria of balance and proportionality between the legitimate interest and the fundamental rights and freedoms of the data owner are taken into account.

### **4.1.3. COMPLIANCE WITH PROCESSING CONDITIONS FOR PROCESSING SPECIALLY QUALIFIED PERSONAL DATA**

Special quality personal data can be processed by Kahveci Otomotiv by taking the necessary measures determined by the Board.

#### *4.1.3.1. Processing of Special Quality Personal Data Other Than Health and Sex Life*

Personal data of special quality other than health and sex life by Kahveci Otomotiv (data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, health, sex life, criminal conviction and safety measures, and biometric and genetic data); data can be processed with the express consent of the owner or in cases stipulated in the law.

#### *4.1.3.2. Processing Health Data*

Personal health data can be processed by Kahveci Otomotiv in the presence of one of the following conditions:

- Processing by persons or authorized institutions and organizations under the obligation to keep secrets for the purpose of protecting public health, preventive medicine, medical diagnosis, conducting treatment and care services, planning and management of health services and financing,
- The existence of the express consent of the personal data owner.

#### **4.1.4. COMPLIANCE WITH THE TRANSFER CONDITIONS OF PERSONAL DATA**

Personal data transfer activities carried out by Kahveci Otomotiv are treated in accordance with articles 8 and 9 of the Law.

##### *4.1.4.1. Domestic Transfer of Personal Data*

Personal data may be transferred domestically by Kahveci Otomotiv in accordance with the personal data processing requirements mentioned in Article 4.1.2 of the Law in accordance with Article 8 of the Law.

##### *4.1.4.2. Transfer of Personal Data Abroad*

Personal data in accordance with the 9th law by Kahveci Otomotiv If the personal data processing requirements mentioned in 4.1.2. are processed in accordance with the conditions of processing and the country to be transferred is one of the countries with sufficient protection announced by the Board or there is not sufficient protection in the relevant foreign country, data responsible in Turkey and related foreign countries can be transferred abroad if the Board has permission.

## **4.2. ENLIGHTENING THE PERSON CONCERNED IN THE PROCESS OF PERSONAL DATA**

In accordance with Article 10 of the Law and the Communiqué on the Procedures and Principles to Be Followed in the Fulfillment of the Lighting Obligation by Kahveci Otomotiv, personal data owners are informed through the illumination texts that are watered down during the obtaining of their personal data. In these lighting texts; the title of organization, the purpose of personal data processing, for what purpose the processed personal data can be transferred to, the method of collecting personal data and the legal reason of the person concerned with the 10th law. the rights listed in the article.

### 4.3. FINALIZING APPLICATIONS FROM CONCERNED PERSONS

Applications made by Kahveci Otomotiv in accordance with article 13 of the Law and the Communiqué on The Procedures and Principles of Application to the Data Controller are answered as soon as possible and within thirty days at the latest in order to exercise their rights under Article 11 of the Law.

## 5. STORAGE AND DESTRUCTION OF PERSONAL DATA

### 5.1. REGISTRATION ENVIRONMENTS

Personal data processed by Kahveci Otomotiv is stored in the recording environments listed in Table-1 by taking the necessary safety precautions.

*Table-1: Personal Data Storage Environments*

Electronic Media	Non-Electronic Environments
<ul style="list-style-type: none"> <li>- Servers: Server, Backup Devices, E-mail, Database, Web, File Sharing, etc.</li> <li>- Software: Office Software, Business Tracking and Accounting Programs, etc.</li> <li>- Information Security Devices: Antivirus, Firewall, etc.</li> <li>- Personal Computers</li> <li>- Mobile Devices: Phone, Tablet, etc.</li> <li>- Optical Discs: CD, DCD, VCD, etc.</li> <li>- Portable Memory: USB, Memory Card, etc.</li> <li>- Printer, Scanner, Copier</li> </ul>	<ul style="list-style-type: none"> <li>- Paper</li> <li>- Manual Data Recording Systems: Form, Agenda, Visitor Book, etc.</li> <li>- Written, printed, visual environments</li> </ul>

### 5.2. LEGAL REASON AND PURPOSE IN THE STORAGE OF PERSONAL DATA

The personal data of employees, employee candidates, interns, visitors, third parties and their employees, customers and employees, shareholders and corporate and organization employees are stored and destroyed in accordance with the Law.

#### 5.2.1. LEGAL REASONS THAT REQUIRE RETENTION

Within the framework of the activities carried out by Kahveci Otomotiv, personal data processed in accordance with the conditions (legal reasons) listed in 4.1.2. and 4.1.3 are retained for the period stipulated in the relevant legislation. In this context, personal data.

- 6698 Personal Data Protection Law,
- Turkish Debt Law No. 6098,
- Turkish Commercial Code No. 6102,

- Social Insurance and General Health Insurance Law No. 5510,
  - Labor Law No. 4857,
  - Occupational Health and Safety Law No. 6331,
  - Tax Procedure Law No. 213,
  - Pensioner Health Law No. 5434,
  - Social Services Law No. 2828,
  - Occupational Health and Safety Services Regulations,
  - Regulation on Health and Safety Measures in Studies with Carcinogenic or Mutagenic Substances,
  - Regulation on Health and Safety Measures to be taken in Workplace Buildings and Add-ons,
  - Other secondary regulations in force in accordance with these laws,
  - Board decisions and opinions and policies,
  - Relevant commercial practices
- the storage periods prescribed within the framework of the framework.

### ***5.2.2. PURPOSES THAT REQUIRE STORAGE***

Personal data processed by Kahveci Otomotiv in accordance with the principles and conditions stipulated in 4.1 within the framework of its activities are retained for a period in the relevant legislation. In this context, personal data.

- Conducting emergency and information security processes,
- Conducting human resources and occupational health and safety activities for employee and employee candidates,
- Conducting audit, ethics, and educational activities,
- Execution of access powers and commissioning activities,
- Conducting activities in accordance with the legislation,
- Conducting finance, accounting, marketing, service or product buying/selling, support and loyalty processes,
- Fulfillment of communication activities,
- Execution of storage and archival activities,
- Execution of contract processes,
- Conducting sponsorship and social responsibility activities,
- Follow-up of requests and complaints,
- Ensuring the safety of moved goods and physical space,
- Informing authorized persons or institutions and using them as evidence in legal disputes that may arise,
- Execution of premed activity,
- It can be processed for the purposes of creating visitor records.

### **5.3. REASONS THAT REQUIRE THE DESTRUCTION OF PERSONAL DATA**

Personal data processed by Kahveci Otomotiv.

- Change or ilga of the provisions of the relevant legislation, which are the basis for its employment,
- The elimination of the purpose that requires its process or storage,
- In cases where the processing of personal data occurs only in accordance with the condition of open consent, the person concerned should withdraw his/her clear consent,
- In accordance with article 11 of the Law, the application made by Kahveci Otomotiv regarding the deletion and destruction of personal data within the framework of the rights of the person concerned is accepted by Kahveci Otomotiv,
- By the contact, rejection of the application made with the request to delete, destroy or anonymization of personal data, insufficient response or no response within the period prescribed in the Law; To complain to the Board and to make this request appropriate by the Board,
- The maximum period required for the storage of personal data and the absence of any conditions to justify storing personal data for a longer period, in their case, at the request of the person concerned or at the request of the person concerned, deleted, destroyed or anonym.

is brought in.

### **6. TREATMENTS FOR THE PROTECTION OF PERSONAL DATA**

By Kahveci Otomotiv, all processes related to personal data processing activities have been restructured and maximum efforts are made to take administrative and technical measures required by the legislation and the decisions of the Board for the purposes of safely sedition of personal data, preventing unlawful processing and access, and destroying personal data in accordance with the law. The following administrative and technical measures are taken within Kahveci Otomotiv, which is important for ensuring the security of personal data.

#### **6.1. EXECUTION TREATMENTS**

The administrative measures taken to protect the personal data processed by Kahveci Otomotiv are as follows:

- Trainings are given on the prevention of unlawful processing of personal data, prevention of unlawful access of personal data, provision of personal data, communication techniques, technical knowledge and skills, Kanun no.6698 and other relevant legislation for the prevention of awareness and attitudes of employees in the field of protection of personal data.
- Employees are signed confidentiality agreements regarding the personal data processed in the activities carried out.

- Disciplinary procedures have been prepared for employees who do not comply with security policies and procedures.
- The obligation to enlighten the relevant persons is fulfilled by the Organization before starting to process personal data.
- Personal data processing inventory has been prepared.
- In-house periodic and random audits are carried out on the determination of compliance with legislation and organizational policies and procedures in the field of protection of personal data.
- Information security trainings are provided for employees.
- Necessary security measures are taken regarding the entry and exit of physical environments containing personal data.
- Assignment, authorization and access procedure was prepared for employees and authorizations were made to access areas containing personal data among employees.
- Corporate policies on access, information security, use, storage and destruction have been prepared and implemented.
- Employees who have changed duties or left their job are being de-authorized in this area.
- The signed agreements contain the provisions of data security.
- Extra security measures are taken for personal data transmitted via paper.
- Personal data security policies and procedures have been set.
- Personal data security issues are quickly reported.
- The safety of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.
- Personal data is reduced as much as possible.
- Personal data is backed up and the personal data backed up is ensured to be security.
- Protocols and procedures for special quality personal data security are determined and implemented.
- Data processing service providers are aware of data security.

## 6.2. TECHNICAL TREATMENTS

The technical measures taken to protect the personal data processed by Kahveci Otomotiv are as follows:

- Necessary measures are taken for the physical security of the organization's information systems equipment, software and data.
- To ensure the safety of information systems against environmental threats, physical (access control system that allows only authorized personnel to enter the system room, 24/7 monitoring system, ensuring physical safety of the switches that make up the local area network, fire extinguishing system, air conditioning system, etc.) and textual (firewalls, systems that block software, etc.) measures are taken.
- Within the organization, access procedures are established and reporting and analysis studies are carried out on access to personal data.

- By monitoring the vulnerabilities, appropriate security patches are installed and information systems are kept up to date.
- Strong passwords are used in electronic environments where personal data is processed.
- Data-supporting programs are used to securely store personal data.
- Access to personal data stored in electronic or non-electronic environments is limited according to the principles of access.
- Electronic media where specially qualified personal data is processed, stored and/or accessed are stored using encryption methods, passwords are kept in secure environments and security updates of environments are constantly monitored.
- If specially qualified personal data needs to be transferred via e-mail, it is transmitted encrypted by corporate e-mail address or using KEP account. If it needs to be transferred via media such as portable memory, CDs, DVDs, it is encrypted and passwords are kept in different media.
- Employees who have changed duties or left their job are being de-authorized in the relevant field.
- Up-to-date anti-virus systems are used.
- Network firewalls are used.
- In-house periodic and/or random audits are carried out and carried out.

## **7. DESTRUCTION TECHNOLOGIES OF PERSONAL DATA**

Personal data processed by Kahveci Otomotiv are destroyed during the periodic destruction period following the expiration of the retention periods stipulated in the relevant legislation or linked for the purpose of the operation. Destruction techniques are deleted, destroyed, or anonym.

### **7.1. PERSONAL DATA SECLATION**

The methods used to delete personal data are:

For those whose period requires that it be stored from the personal data contained on the servers expires, the system administrator performs the deletion by lying down the access authority of the relevant users.

Those whose period of time required to be stored from personal data contained electronically are made inaccessible and unusable again by deleting it for other employees (related users) except the database administrator (the person who provides the organization's IT service).

For those whose period requires it to be stored from personal data in the physical environment, it is made inaccessible and unusable again for other employees, except for the unit manager responsible for the document archive. In addition, blacking is applied by drawing/painting/deleting it so that it cannot be read.

Those whose period required to be stored from personal data contained in portable media are encrypted by the system administrator and the access authority is given only to the



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system administrator and stored in secure environments with encryption keys.

## 7.2. DESTROYING PERSONAL DATA

The methods used to destroy personal data are:

Those whose period of time required to be stored from personal data in the physical environment are destroyed so that they cannot be returned by being passed through paper clipping machines or burned.

The process of physical destruction is applied, such as melting, burning, or dusting those whose expiry period requires the storage to be stored from personal data contained in the instable media. In addition, the magnetic media is passed through a special device and the data on it is made unreadable by exposure to the magnetic field at a high value.

## 7.3. ANONIMATION OF PERSONAL DATA

Anonymization of personal data is to make personal data unaffable to an identifiable or identifiable real person under any circumstances, even if it is matched with other data. For the anonymization of personal data; personal data must be returned by the data controller or third parties and/or made unaffable with an identifiable or identifiable natural person, even through the use of appropriate techniques in terms of the recording environment and related field of activity, such as mapping the data to other data.

Personal data processed by Kahveci Otomotiv can also be destroyed by anonymization.

## 8. STORAGE AND DESTRUCTION PERIODS

The destruction of all personal data processed by Kahveci Otomotiv is destroyed at the request of the person concerned or resin after it is stored in connection with the purposes and purposes of the storage shown above (5.2.) for the purposes and purposes for which they are processed or stipulated in the relevant legislation. The extermination officers and officials are organized in detail with the In-house Personal Data Destruction Procedure.

Unit and activity-based retention periods of all personal data processed by Kahveci Otomotiv are included in the Kahveci Automotive Personal Data Inventory and the storage periods based on personal data categories are included in the VERBIS notification.

In this policy, table-2 and the retention periods of personal data based on the relevant person and processing activity are expressed.

*Tablo-2: Storage and Destruction Periods of Personal Data WILL BE UPDATED IN EVERY COMPANY*

PERSONAL DATA SOURCE	RETENTION TIME	DESTRUCTION TIME
ACCOUNTING AND FINANCIAL ALL RECORDS RELATED TO TRANSACTIONS	10 YEARS	Track the end of the retention period during the first periodic destruction period.



PERSONAL DATA FOR CUSTOMER	10 YEARS AFTER THE END OF LEGAL RELATIONS	First periodic destruction following the end of the retention period of time
PERSONAL DATA FOR THE SUPPLY	10 YEARS AFTER THE END OF LEGAL RELATIONS	First periodic destruction following the end of the retention period of time
Contracts	10 YEARS AFTER THE EXPIRY OF THE CONTRACT	Track the end of the retention period during the first periodic destruction period.
PERSONAL DATA PROCESSED IN CONTRACT-RELATED RELATIONSHIPS	10 YEARS TO FOLLOW THE EXPIRY OF THE CONTRACT RELATIONSHIP	At the first periodic extermination period following the end of the retention period
INVOICE, SHIPMENT, etc.	10 YEARS	First periodic destruction following the end of the retention period of time
HUMAN RESOURCES PROCESSES	10 YEARS AFTER THE END OF OPERATION	First periodic destruction following the end of the retention period of time
PERSONAL INFORMATION KEPT IN PERSONNEL PERSONAL FILE	10 YEARS AFTER THE END OF BUSINESS RELATIONSHIP	At the first periodic extermination period following the end of the retention period
STAFF PAYROLL, IN AND OUT, ANNUAL LEAVE, MORE INFORMATION SUCH AS WORK	10 YEARS AFTER THE END OF BUSINESS RELATIONSHIP	First periodic destruction following the end of the retention period of time
OHS FROM STAFF DATA COLLECTED WITHIN THE SCOPE	15 YEARS AFTER THE END OF BUSINESS RELATIONSHIP	Track the end of the retention period during the first periodic destruction period.
COLLECTED WITHIN THE SCOPE OF OHS FROM PERSONNEL EXPOSED TO CARCINOGENIC OR MUTAGENIC SUBSTANCES Data	40 YEARS AFTER THE END OF BUSINESS RELATIONSHIP	At the first periodic extermination period following the end of the retention period
PERSONNEL COURT/ENFORCEMENT FILE Information	10 YEARS AFTER THE END OF BUSINESS RELATIONSHIP	First periodic destruction following the end of the retention period of time

PERSONNEL KVKK MUVAFKATNAMES	FOLLOW THE END OF BUSINESS RELATIONSHIP 15 OR 40 YEARS	First periodic destruction following the end of the retention period time
INFORMATION RECEIVED WITHIN THE SCOPE OF JOB/INTERNSHIP APPLICATION	IF THE APPLICATION HAS NOT BEEN ACCEPTED, THE APPLICATION DATE 1 YEAR	At the first periodic extermination period following the end of the retention period
VISITOR REGISTRATIONS	2 YEARS	First periodic destruction following the end of the retention period time
CAMERA RECORDS	2 YEARS	First periodic destruction following the end of the retention period Time
SATISFACTION SURVEYS	1 YEAR	First periodic destruction following the end of the retention period time
APPLICATION FORM TO THE DATA CONTROLLER	APPLICATION AND, IF ANY, THE END OF THE COMPANY'S CONTRACTING PROCESS 10 YEARS FOLLOWED BY MELT	At the first periodic extermination period following the end of the retention period

## 9. PERIODIC DESTRUCTION TIMES

Kahveci Otomotiv has determined the periodic destruction period as 6 months in accordance with Article 11 of the Regulation on The Deletion, Destruction or Anonymization of Personal Data. In this context, periodic extermination is carried out every year in April and October.

## 10. UPDATING, SEDDING AND PUBLISHING POLICY

This Policy is maintained for at least 5 years, approved by the general manager of the organization, in printed paper media. In addition, the Policy is maintained electronically among the establishment quality documents.

The policy is also published by Kahveci Otomotiv on the internet([www.kahveci.com.tr](http://www.kahveci.com.tr)) and announced to the public. The policy is reviewed and updated as needed.

The repeal of the policy takes place by the decision of the general manager of the organization. If the policy is repealed or outdated, the old copies will be cancelled with the approval of the general manager.