



**ETI SODA PRODUCTION MARKETING TRANSPORTATION AND
ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED
COMPANY**

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

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ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY	ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY. Personal Data Storage And Disposal Policy
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Approved By	ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY.

In case of any inconsistency between the Turkish version of the policy and any translation, the Turkish version should be respected.

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POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

TABLE OF CONTENTS

1.	PURPOSE	3
2.	DEFINITIONS	3
3.	PRINCIPLES	4
4.	EXPLANATIONS REGARDING THE REASONS FOR STORAGE AND DISPOSAL	5
5.	STORAGE AND DISPOSAL DURATIONS	6
6.	METHODS OF STORAGE AND DISPOSAL OF PERSONAL DATA BY OUR COMPANY	6
6.1.	STORAGE MEDIA	6
6.2.	TECHNICAL AND ADMINISTRATIVE MEASURES	7
6.3.	METHODS OF DISPOSAL OF PERSONAL DATA	7
7.	MISCELLANEOUS.....	8

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

1. PURPOSE

ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY Personal Data Storage and Disposal Policy ("Storage and Disposal Policy") has been prepared based on the Law on the Protection of Personal Data No. 6698 ("KVKK" or "Law") and related legislation.

It is aimed to fulfill our obligations under the Storage and Disposal Policy and the Regulation on Deletion, Disposal and Anonymization of Personal Data ("**Regulation**"), to determine the maximum storage duration necessary for the purpose for which the personal data is processed, as well as the processes of deletion, disposal, and anonymization."

2. DEFINITIONS

Anonymization	:	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data
Disclosure Text	:	Disclosure to the relevant person on how long the personal data will be stored and for what purpose, how it is collected, how it is stored and whether it will be shared with third parties
Authority	:	Personal Data Protection Authority
Inventory	:	An inventory created by data controllers, linking personal data processing activities carried out in connection with their business processes to the purposes of personal data processing, data categories, recipient groups to whom data is transferred, and the group of data subjects, detailing and explaining the maximum period necessary for the purposes for which the personal data is processed, personal data intended to be transferred to foreign countries, and the measures taken regarding data security.
Relevant Person	:	Natural person whose personal data is processed
Disposal	:	Deletion, destruction or anonymization of personal data
Law/KVKK	:	Law on the Protection of Personal Data
Storage Media	:	Any media containing personal data processed wholly or partially in an automatic manner or non-automatic manners on condition that such manners are a part of any data registry system.
Personal Data	:	Any kind of information regarding an identified or identifiable natural person
Processing of Personal Data	:	Recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying of personal data
Deletion of Personal Data	:	Process of deleting personal data, making personal data unavailable and unusable in any way for relevant users
Destruction of Personal Data	:	Process of destroying personal data, making personal data unavailable and unusable in any way for relevant users
the Board	:	Personal Data Protection Board
Authority	:	Personal Data Protection Authority
Sensitive Personal Data	:	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations,

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

		foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Periodical Disposal	:	In the event that all of the conditions for processing personal data specified in the Law cease to exist, the process of deletion, destruction, or anonymization that will be carried out ex officio at recurring intervals as specified in the personal data storage and disposal policy
VERBIS	:	The information system, accessible via the internet, established and managed by the Authority, which data controllers will use in applying to the Registry and for other related processes concerning the Registry.
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 Controller	:	A 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 Controllers Registry	:	The Data Controllers Registry kept by the Authority.
Data Controller Contact Person	:	The natural person notified by the data controller at the time of registration to the Registry for communication with the Authority concerning the obligations under the Law and secondary amendments to be issued based on this Law, for legal entities located in Türkiye and for the representative of legal entities not located in Türkiye
Regulation	:	The Regulation on the Deletion, Destruction, or Anonymization of Personal Data, published in the Official Gazette on October 28, 2017

3. PRINCIPLES

In the deletion, destruction, and anonymization of personal data, our company follows the principles listed in Article 4 of the KVKK (Law on the Protection of Personal Data) and provided below:

- 3.1. Personal data may only be processed in accordance with the procedures and principles prescribed by the KVKK and other laws.
- 3.2. It is mandatory under the KVKK to comply with the following principles when processing personal data.
 - a. Being in compliance with the law and honesty rules.
 - b. Being accurate and, when necessary, up-to-date.
 - c. Being processed for specific, explicit, and legitimate purposes.
 - d. Being relevant, limited, and proportionate to the purposes for which they are processed.
 - e. Being retained for the period stipulated in the relevant legislation or as required for the purpose for which they are processed.
- 3.3. In terms of compliance with the principles mentioned above, our Company, as the Data Controller, acts in accordance with the provisions on data security stipulated in the KVKK.
- 3.4. Unless otherwise decided by the Board, our Company determines the appropriate method for the ex officio deletion, destruction, or anonymization of personal data.

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

- 3.5.** In the event that all conditions for the processing of personal data, as stated in Articles 5 and 6 of the KVKK, cease to exist, personal data is deleted, destroyed, or anonymized by our Company ex officio or upon the request of the relevant person. In this regard, if the Relevant Person applies to our Company;
- a.** The requests submitted to our Company are finalized within at least 30 (thirty) days, and the relevant person is informed.
 - b.** In the event that the data in question has been transferred to third parties, this situation is communicated to the third party to whom the data has been transferred, and necessary actions are ensured to be taken by these third parties.

4. EXPLANATIONS REGARDING THE REASONS FOR STORAGE AND DISPOSAL

Personal data belonging to personal data owners are processed, stored, and disposed of securely by our Company within the limits specified in the KVKK and other relevant legislation, in physical and/or electronic media.

4.1. Reasons Requiring the Storage of Personal Data

- a.** Being directly related to the establishment and execution of contracts,
- b.** Storing personal data for the establishment, exercise, or protection of a right,
- c.** The necessity of storing personal data for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of individuals,
- d.** Storing personal data for our Company to fulfill any legal obligation,
- e.** The explicit stipulation of the storage of personal data in the legislation,
- f.** The presence of explicit consent of the data owners for storage activities requiring the explicit consent of the data owners.

4.2. Reasons Requiring the Disposal of Personal Data

Personal data is deleted, destroyed, or anonymized ex officio or upon request by our Company within the scope of the relevant legislation for the following reasons:

- a.** The amendment or abolition of the relevant legislative provisions that constitute the basis for the processing or storage of personal data,
- b.** The purpose requiring the processing or storage of personal data ceases to exist,
- c.** The cessation of conditions that require the processing of personal data under Articles 5 and 6 of the Law,
- d.** Withdrawal of consent by the relevant person in cases where the processing of personal data is based solely on the condition of explicit consent,
- e.** The acceptance of the request by the data controller regarding the deletion, destruction, or anonymization of personal data within the framework of the rights of the relevant person under subparagraphs (e) and (f) of Article 11 of the Law,

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

- f. In cases where the data controller rejects the application made by the relevant person with the request for deletion, destruction or anonymization of their personal data, their response is found insufficient or they do not respond within the period stipulated in the Law; filing a complaint to the Board and this request is approved by the Board,
- g. Despite the expiration of the maximum period requiring the storage of personal data, the absence of any conditions justifying a longer storage period.

5. STORAGE AND DISPOSAL DURATIONS

Personal data and sensitive categories of personal data are classified within our Company, and the storage and disposal process is determined for each type of personal data.

- 5.1. Legal obligations are taken into account, and if a storage period is prescribed for any personal data, this period is adhered to.
- 5.2. If there is a need to retain personal data for a period longer than the minimum legal storage period for the continuation of commercial activities and/or any exceptional need, the disposal period for that specific personal data is determined as a longer period. Storage and disposal periods are determined by the Personal Data Inventory. Upon the expiration of this period, the data is deleted, destroyed, or anonymized.
- 5.3. Personal data the storage period of which has expired are disposed of at 6-month intervals, based on the periods specified in the relevant annex, in accordance with the procedures specified in this "Storage and Disposal Policy."
- 5.4. All operations related to the deletion, destruction, and anonymization of personal data are recorded, and these records are retained for a minimum of three years, excluding other legal obligations.
- 5.5. The maximum storage and disposal periods for the data processed by the Company are included in VERBIS and the Personal Data Processing Inventory.

6. METHODS OF STORAGE AND DISPOSAL OF PERSONAL DATA BY OUR COMPANY

6.1. STORAGE MEDIA

Personal data belonging to data owners are securely stored by our Company in the media listed in the table below, in accordance with the provisions of the KVKK and other relevant legislation, and within the framework of international data security principles:

Electronic media:

- E-mail
- Computer
- Servers
- Softwares and Applications

Physical environments:

- Office Lockers

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

- Locked Archives
- Files

6.2. TECHNICAL AND ADMINISTRATIVE MEASURES

Our Company has taken administrative and technical measures to ensure that personal data is securely stored and disposed of, and unlawful processing and unauthorized access are prevented, in accordance with the principles in Article 12 of the KVKK.

6.3. METHODS OF DISPOSAL OF PERSONAL DATA

Personal data obtained by our Company in compliance with the KVKK and other relevant legislation will be disposed of by our Company ex officio or upon the request of the Relevant Person, in accordance with the Law and relevant legislative provisions, using the techniques specified below, in the event that the purposes for processing personal data listed in the Law and the Regulation cease to exist.

a. Methods for Deletion and Destruction of Personal Data:

The procedures and principles related to the deletion and destruction methods of personal data by our Company are listed below:

Deletion from Systems: When deleting data processed through fully or partially automated means and stored in digital environments, methods are used to delete the data from the relevant software in a way that it becomes completely inaccessible and unusable for Relevant Users.

This includes deleting relevant data from systems by issuing a delete command, removing access rights for the user on the file or directory where the file is located on the central server, deleting relevant rows in databases with database commands, or deleting data on portable media such as flash drives using appropriate software.

If the deletion of personal data would result in the inaccessibility and unusability of other data in the system, personal data shall be considered deleted if it is archived in a way that it cannot be associated with the relevant person, on condition that the following conditions are met:

- It is inaccessible to any other institution, organization, or person,
- All necessary technical and administrative measures are taken to ensure that only authorized persons can access the personal data.

Obfuscation of Personal Data in Physical Environments: To prevent the use of personal data for unfit purposes or to delete the data requested to be deleted, methods such as physically cutting out the relevant personal data from the document or using permanent ink in such a manner that it cannot be reversed and cannot be read with technological means.

Physical Destruction: Personal data can be processed through non-automated means on condition that such means are a part of any data recording system. During the destruction of such data, a system is applied to physically destroy the personal data so that it cannot be used later. The destruction of data on paper and microfiche must be carried out in this manner since it is not possible to destroy them in another way.

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

Regarding equipment to be disposed of within the company, they must first be checked whether any information that can contain personal data is present on the equipment. For equipment containing personal data, the units (disk, external memory, etc.) and hardware should be disassembled and used as spare parts.

Beyond traditional deletion or formatting processes, sufficient procedures should be applied to ensure that the storage device's information cannot be read again.

- If the equipment to be disposed of is an active device (modem, switch, router, etc.), it should be reset to default settings before disposal.
- If critical information is on any media (CD, DVD, etc.), the media can be destroyed by breaking it.
- All papers containing classified but invalid, misprinted, or unusable information should be destroyed using a paper shredder and/or by burning them with an official record.
- Disposed equipment must be removed from the inventory list.
- Equipment that does not have the capability to store information can be used as needed after being removed from the inventory and record.

Overwriting: The overwriting method is a data destruction method using special software to write random data composed of 0s and 1s over magnetic media and rewritable optical media at least seven times, making it impossible to read or recover the old data.

During situations mentioned above, our Company fully complies with the KVKK, the Regulation, and other relevant legislative provisions to ensure data security and takes all necessary administrative and technical measures.

7. MISCELLANEOUS

In the event of any incompatibility between the provisions of the KVKK and other relevant legislation and this Policy, the provisions of the KVKK and other relevant legislation shall apply first.

ANNEXES:

Annex-1: Personal Data Disposal Record

This policy was updated on 19.12.2023 and became Version:2.

POLICY STATEMENT ON PERSONAL DATA STORAGE AND DISPOSAL

INFORMATION SECURITY, KVKK COMPLIANCE AND IMPLEMENTATION COMMITTEE

Fatma Aysun CEBİ	Legal Counselor	Member/Contact Person
Dilek ARISOY	Vice General Manager / Accounting Budget and Planning Director	Member
Çağatay MADAK	Human Resources Manager	Member
Emrah DALGIÇ	Accounting Manager	Member
Onur AKBABA	Quality Assurance & Quality Control Manager	Member
Sedat ABAKAY	Workplace Physician	Member
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