



BENTELER GEBZE TAŞIT SAN. VE TİC. LTD. ŞTİ.

PERSONAL DATA STORAGE AND DESTRUCTION POLICY

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BENTELER GEBZE TAŞIT SAN. VE TİC. LTD. ŞTİ.

PROTECTION AND DESTRUCTION OF PROCESSING PERSONAL DATA

1. INTRODUCTION

1.1. Purpose

The purpose of this policy; The Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. processed personal data protection of personal data for various purposes and from the channels written to the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti., the identification of personal data in printed or electronic form and appropriate controls; the establishment of a secure environment to store this data and this data are carried out by the preparation of limited access to authorized persons and to be sure that the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. processed personal data deleted the maximum period required for the purpose for which they are processed, identification of the processes of destruction or anonymity and identification of the roles and responsibilities of the persons involved in these processes and the management of personal data breaches.

The business and transactions related to the storage and destruction of personal data are carried out in accordance with the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. 's policy.

1.2. Scope

The scope of this policy; Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. employees, employee candidates, customers, visitors and other third parties the personal data of the confidentiality, privacy to protect your personal data when it comes to the implementation of the necessary controls and precautions to be taken times the maximum storage of personal data personal data will be stored in accordance with the law, where personal data are processed taken technical and administrative measures to be disposed of all recording environments and constitute the activities with regard to the processing of personal data. In this context, only a number of provisions of this policy may be applied to the groups of personal data owners mentioned above, as well as the whole of this policy.

1.3. Definitions

The definitions of the terms and abbreviations contained in this Policy are as follows:

Explicit Consent	Freely given, specific and informed consent
Groups of Recipients	Category of real or legal persons in which personal data is transferred by the data controller.
Anonymizing	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data
Presidential	Board of Protection of Personal Data
Employee	Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. personal
Benteler	Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.
Electronic environment	Environments where personal data can be created, read, exchanged and written with electronic devices.

Non-Electronic Environment	All written, printed, visual, etc. media that are excluded from electronic media.
Service Provider	A real or legal person providing services under a specific term of contract with the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.
Data Subject	The natural person, whose personal data is processed
Related User	Persons who process personal data within the data officer organization or in accordance with the authorization and instructions it receives from the data manager, excluding the person or unit responsible for technically storing, protecting and backing up data.
Destruction	The process of making personal data inaccessible, non-refundable and unusable by anyone in any way
Recording Environment	Any environment where personal data is completely or partially automated or processed by non-automated means, as part of any data recording system.
KEP	Registered Electronic Mail
Registered Electronic Mail	Secure e-mail service with legal validity in case of dispute, where sender and receiver IDs are identified, shipping time and content cannot be changed
Personal Data	All the information relating to an identified or identifiable natural person
Personal Data Processing Inventory	The personal data processing activities of data controllers based on their business processes; the purpose scanning for personal data and its legal reason, the category of data, the group of recipients transferred, and the maximum duration of the protection required for the purposes for which personal data is processed, the inventory they elaborate by describing the personal data envisaged to be transferred to countries and the measures taken regarding data security.
Processing of Personal Data	Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means
Board	Personal Data Protection Board
Law	Personal Data Protection Law
Committee on the Protection of Personal Data	A committee established to carry out administrative monitoring of processes established under the Personal Data Protection Act and sub-regulations appointed by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.
Personal Data of Special Nature	Information on the race, ethnicorigin, political opinion, philosophical beliefs, religion, sect or other beliefs, disguise and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data

Periodic Destruction	In the event that all of the terms of the processing of personal data contained in the law are eliminated, the deletion, destruction and anonymity will be performed at repeated intervals as set out in the policy of retention and destruction of personal data.
Policy	Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. . Protection and Destruction of Processing Personal Data
Processor	The natural or legal person who processes personal data on behalf of the controller upon his authorization
Filing system	Any recording system through which personal data are processed by structuring according to specific criteria
Data controller	Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.
Data Managers Registry Information System	Data managers will use in the application of the Registry and other related transactions related to the Register, accessible over the internet, created and managed by the Presidency information system.
VERBİS	Data Managers Registry Information System
Regulation	Regulation on the erasure, destruction or Anonymizing of personal data.

Bu Politika 'da yer almayan tanımlar için Kanun'daki tanımlar geçerlidir.

2. RESPONSIBILITY AND DUTY DISTRIBUTION

Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.'s units and employees responsible for technical and administrative units that are being taken by the proper implementation of the measures under the policy of staff training and awareness raising, monitoring and continuous control to prevent unlawful processing of personal data, personal data, and preventing access to lawful and unlawful storage of personal data personal data is processed for purposes of technical and administrative measures for ensuring data security in all environments responsible for the introduction of the units gives active support to the issues.

The distribution of the titles, units and job descriptions of those involved in the storage and destruction of personal data is given in Table 1.

Tablo 1: Storage and Desturuction processes task distribution

TITLE	Unit	Assignment
General Manager	Headquarters	He/She is responsible for the conduct of the policy in accordance with his/her duties.
Staff and Administrative Affairs Director	Department of Staff and Administrative Affairs	He/She is responsible for the preparation, execution, action, development, publication and updating of

		employees in accordance with the policy.
IT specialist	System Management Department	He/She is responsible for providing the technical solutions needed in the implementation of the policy.

3. REGISTRATION ENVIROMENTS

Personal data is securely stored by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. in accordance with the law in the environments listed in Table 2.

Table 2: Personal Data Storage Environments

Electronic Recording Media	Physical Recording Environments
<ul style="list-style-type: none"> ➤ Servers (Domain, backup, email, database, web, file sharing, etc.) ➤ Softwares (Office Software, SAP, Link, VERBİS.) ➤ Information security devices (firewalls, attack detection and blocking, anti-virus, etc.) ➤ Personal computers (desktop, laptop) ➤ Mobile devices (phones, tablets, etc.) ➤ Optical discs (CD,DVD etc.) ➤ Removable memory (USB, Memory Card, etc.) ➤ Printer, scanner, copier 	<ul style="list-style-type: none"> ➤ Paper ➤ Manual data registration systems (survey forms, visitor entry book) ➤ Written, printed, visual media ➤ Environments where personal data, such as archives, office storage cabinets, etc. are stored physically

4. DESCRIPTIONS OF STORAGE AND DESTRUCTION

By the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti., Personal data belonging to employees, employee candidates, visitors, customers and third parties engaged in as service providers, organizations or organizations'employees is stored and destroyed in accordance with the Law.

Article 3 of the Act defines the concept of the processing of personal data, the personal data processed in Article 4 is limited and measured in connection with the purpose for which they are processed, and the time required for the purpose for which they are intended or processed in the relevant legislation must be maintained, In articles 5 and 6, the terms of processing of personal data are counted.

In this context Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. processes personal data in accordance with articles 5/1, 5/2-a, 5/2-B, 5/2-c, 5/2-ç, 5/2-e, 5/2-F and 6/3 within the framework of its activities and stores it for the period stipulated in the relevant legislation or for the period appropriate to the processing purposes.

- 5/1 Personal data shall not be processed without obtaining the explicit consent of the data subject.
- 5/2-a It is expressly permitted by any law;
- 5/2-b It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent.
- 5/2-c It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract.
- 5/2-ç It is necessary for compliance with a legal obligation which the controller is subject to.
- 5/2-e It is necessary for the institution, usage, or protection of a right.
- 5/2-f It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed.
- 6/3 Personal data indicated in paragraph 1, other than personal data relating to health and sexual life, may be processed without obtaining the explicit consent of the data subject if processing is permitted by any law. Personal data relating to health and sexual life may only be processed without obtaining the explicit consent of the data subject for purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing by persons under the obligation of secrecy or authorized institutions and organizations.

4.1. Legal Reasons for Storage

The personal data processed within the framework of the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. 's activities are kept for the period stipulated in the relevant legislation;

- Turkish Code of Obligations No. 6098
- Turkish Commercial Law No. 6102
- Turkish Civil Code No. 4721
- Personal Data Protection Law No. 6698
- Consumer Protection Law No. 6502
- Labor Law No. 4857
- Occupational Health and Safety Act and related Regulations No. 6331

it is stored as long as the storage times stipulated in the framework.

4.2. Processing Purposes Requiring Storage

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Employee Candidate / Intern / Student Selection and Placement Process Execution
- Execution of The Application Process of Employee Candidates
- Fulfillment of Obligations arising from Employment Contracts and Legislation for Employees
- Execution of fringe Benefits and Benefits Processes for Employees

- Execution of Employee Satisfaction and Loyalty Processes
- Execution of Audit / Ethics Activities
- Execution of Training Activities
- Execution of Access Powers
- Execution of Activities in Accordance with the Legislation
- Execution of Finance and Accounting
- Ensuring Physical Space Safety
- Execution of Appointment Processes
- Execution of Legal Affairs
- Execution of Internal Audit / Investigation / Intelligence Activities
- Execution of communication activities
- Planning Human Resources Processes
- Execution / Control of Business Activities
- Execution of Occupational Health / Safety Activities
- Conducting Business Continuity Activities
- Receiving and Evaluating Suggestions for Improving Business Processes
- Execution of Logistics Activities
- Execution of Goods/Services Purchasing Processes
- Execution of Goods/Services Sales Processes
- Execution of Wage Policy
- Organization and Event Management
- Execution of Performance Evaluation Processes
- Execution Of Contract Processes
- Execution of Talent / Career Development Activities
- Creation And Tracking Of Visitor Records

4.3. Reasons For Destruction

Personal Data;

- amending or replacing the provisions of the relevant legislation which constitute the basis for its processing,
- elimination of the purpose requiring processing or hiding,
- In cases where processing personal data is carried out solely on the condition of explicit consent, the person concerned may withdraw his or her explicit consent.
- In accordance with Article 11 of the Law, Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. accepts its application for the deletion and destruction of personal data within the framework of the rights of the data subject,
- In the event that the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. rejects the application made to the data subject for the request to delete, destroy or anonymize his personal data, finds his answer insufficient, or does not respond within the time stipulated in the Act; To make a complaint to the Board and to make this request appropriate by the Board,

- The maximum period requiring the storage of personal data has passed and there are no conditions that justify storing personal data for longer,

In those above-mentioned cases, Personal Data are deleted, destroyed, or re-deleted, destroyed, or made anonymous by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. at the request of the data subject.

5. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

In accordance with Article 12 of the Act, Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. shall ensure the appropriate level of security to prevent unlawful processing of the personal data it is processing, to prevent unlawful access to the data, and to ensure the protection of the data. In the event of unlawful disclosure of personal data, it shall act in accordance with the measures provided for in the Act.

5.1. Administrative Measures

- Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. Trains and provides awareness of its employees in relation to the Law on The Protection of Personal Data.
- Employees are informed that they cannot disclose or use the personal data they have learned in contravention of the provisions of the Act and that they will not be able to use it for any purpose other than for processing purposes and that this obligation will continue after their departure from office, and they are required to make the necessary commitments.
- Disciplinary action is carried out if employees do not comply with safety policies.
- In cases where personal data is subject to transfer, Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. Shall ensure that the contracts concluded with the persons to whom the personal data is transferred will be included with the records that the party to whom the personal data is transferred will fulfill its obligations to ensure data security.
- Contracts with the relevant companies in which personal data is transferred in accordance with the law in the event of receiving an external service due to technical requirements for the storage of personal data; the provisions concerning that the persons to whom personal data is transferred will take the necessary security measures to protect personal data and that these measures will be complied with in their own organizations.
- At regular intervals, supplier data processing control is implemented. "The process is operated through the "Supplier Evaluation Form".
- Personal data processing inventory compliant with VERBIS system is issued by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. and compliance audits are carried out here.
- Personal data processing activities carried out by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. are examined in detail and periodically reviewed and updated as needed. In this context, steps to be taken to ensure compliance with the personal data processing requirements stipulated in the Law are determined.
- As a result of the review, non-needed personal data is disposed of safely and securely in accordance with the "Personal Data Storage and Destruction Policy" and the regulation on the deletion, destruction or anonymisation of personal data.

- Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. determines the practices that must be implemented in order to comply with the Law, regulates the "Personal Data Retention and Destruction Policy" and periodically reviews it and updates it as needed. The risks that may arise from personal data breach incidents and how to manage security breaches are also clearly defined.

5.2. Technical Measures

- Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. complies with the Information Security Policies in the storage of personal data.
- Technical measures are taken by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. regarding the protection of personal data to the extent possible by the technology and the measures taken are updated and improved in parallel with the developments.
- In technical matters, expert personnel are employed.
- Periodic inspections are carried out for the implementation of the measures taken.
- Software and systems are installed to ensure security.
- The authority to access personal data processed within the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti is limited to the employees concerned for the purpose of processing.
- Systems suitable for technological developments are used to store personal data in secure environments.
- Technical security systems for hiding areas are established, technical measures taken are audited periodically, risk-generating issues are re-evaluated and the necessary technological solution is produced.
- All necessary infrastructures are used in accordance with the law to ensure that personal data is stored securely.
- Adequate security measures are taken in the physical environments where sensitive personal data is processed, maintained and/or accessed, and unauthorized entry and exit are prevented by ensuring physical security.
- If sensitive personal data is required to be transmitted by e-mail, it is encrypted via corporate email address or using a KEP account. If portable memory needs to be transmitted through environments such as CDs, DVDs, cryptographic methods are encrypted and the cryptographic key is kept in different environments. If transfer between servers in different physical environments is carried out, data is transferred between servers by setting up a VPN or by SFTP method. If it is necessary to transfer through the paper environment, necessary measures are taken against risks such as theft, loss or sighting by unauthorized persons, and the paperwork is sent in "confidential" format.

The main technical measures taken by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. to prevent unlawful access to personal data are listed below;

5.2.1. Ensuring Cyber Security

- Firewall and gateway measures are primarily used to protect personal data-containing information technology systems from unauthorized access threats over the Internet.

- In cases where personal data is provided through different websites and/or mobile application channels to ensure personal data security, connections are made with SSL.
- Current anti-virus software is used. Traffic going to the internet or coming is scanned against viruses.
- Software that are not approved by the company over the Internet cannot be downloaded and these software cannot be installed on company systems.
- Third parties may use the company's Internet with the permission of Information Technology employees and the rules on this subject.
- The services accessed by the user on the network are restricted and unlimited network access is prevented.
- Network access is restricted by creating separate logical areas such as VPN and VLAN.
- Devices used as firewalls are not used for any other purpose.
- Critical updates to the Firewall configuration are made approved by the It Manager.
- Keeping the current topology of network devices, configuration information is stored.

5.2.2. Software Updates

- Removing unused software and services from devices is applied and vulnerabilities are prevented.
- Patch management and software updates of the software, services and hardware used are regularly checked.
- It is regularly checked for proper operation of software and hardware and whether security measures for systems are adequate.

5.2.3. Access Limitations

- Access to systems containing personal data is limited.
- An access authorization and control matrix is created to control inappropriate access or access attempts.
- Employees are given access to the relevant systems through the use of user name and password, to the extent that it is necessary for their work and tasks and their authority and responsibilities.
- Access rights of employees whose job description has changed or left the company are immediately removed.

5.2.4. Password

- When creating a password, strong password combinations consisting of small capital letters, numbers, both digit and punctuation characters, symbols are preferred instead of numbers or sequences of letters that are associated with personal information and which can be easily guessed.
- Passwords are changed at least every 6 (six) months.
- The number of password login attempts is limited to 5 (five).

5.2.5. Anti-virus Software

- Anti-virus program is used to protect against malware and regularly scan the information system network and detect hazards.
- PC connected to the antivirus server automatically update the latest versions from the server on the subnets where they are located.
- Users who are not connected to the domain are kept up to date with different update rules of the anti-virus program.
- Removable media (cd-rom, dvd-rom, bluetooth, flash drive, external disc) are always scanned against viruses.

5.2.6. Monitoring of Personal Data Security

- The servers' anti-virus databases updates are made regularly and in a controlled manner.
- Necessary measures are taken to ensure the uninterrupted and secure operation of database systems.
- Unused services and applications are being closed.
- Servers are located in physically protected system rooms.
- All security-related events that occur in critical systems are logged.
- Security logs related to events not related to the current application on the server, port scanning attacks, and unauthorized persons trying to access privileged accounts are evaluated by the system administrator and necessary precautions are taken, to the data manager.
- Transactions of all users, log records are kept regularly.
- Once a year, Vulnerability and Infiltration tests are carried out and necessary measures are taken by revealing risks, threats, vulnerabilities and openings against information systems.
- Risk analysis is carried out on the company's computer network in order to detect system vulnerabilities and ensure that necessary measures are taken.
- Evidence is securely collected in undesirable incidents such as the collapse of the information system, malicious software, decommissioning attack, incomplete or incorrect data entry, breaches of confidentiality and integrity, misuse of the information system, etc. stored.

5.2.7. Securing Environments Containing Personal Data

- Physical security measures are taken against threats such as the theft or loss of personal data stored in a paper environment and personal data contained on devices.
- Confidential information about personal data, which expires and is no longer needed, is destroyed by paper shredder, incineration, etc.
- In the event of the destruction of server and network devices, the storage device is physically destroyed by taking precautions that the personal data contained in the storage device may not be read again.
- When leaving the computer, precautions are taken to close the session or to activate screen savers that can be activated with the password.
- Documents in a paper environment containing personal data, servers, and backup devices, CDs, DVDs and USB are kept in the system room and archive room with additional security measures for devices such as CDs, DVDs and USB.

- System room and archive room entrances / exits are controlled. It is closed to unauthorized persons.
- The entry of non-corporate visitors and unauthorized personnel into the secure areas is carried out under the supervision of authorized security officers.
- Access control authorization and/or encryption methods are used in cases where devices containing personal data are lost or stolen.
- The physical environment (System room, archive room) in which personal data is contained has external risks (fire, flood, etc.) are protected against by appropriate methods.
- For the purpose of protecting personal data, full disk encryption on devices or a file with personal data on the device is also encrypted.
- Anti-virus programs are installed on computers and servers and cannot be deactivated for any reason.
- Encryption is used to protect sensitive or critical information stored or transmitted.
- Digital signatures or message verification codes are used to maintain the reliability or integrity of sensitive or critical information stored or transmitted.
- Cryptographic techniques are used to obtain evidence of the formation or occurrence of an event or activity.

5.2.8. Information Technology Systems Supply, Development and Maintenance

- Safety requirements are taken into account when determining the requirements for the supply, development or improvement of existing systems.
- Fails or a maintenance period for coming a manufacturer, dealer, service devices that contain your personal data to third parties such as maintenance and repair of the devices that are sent can be sent for before you to ensure the security of your personal data, stored in the data storage media of the device disassembled, only the defective part of the submission process is applied.
- If external personnel have arrived for purposes such as maintenance and repair, necessary measures are taken to prevent them from copying personal data and moving it out of the institution.

5.2.9. Backing Up Process of Personal Data

- In cases where personal data is damaged, destroyed, stolen or lost for any reason, it is activated as soon as possible by using backed up data.
- Personal data backed up is only accessible to the system administrator.
- A backup list is created that determines the systems to be backed up and the system to be backed up is carefully determined.
- The backup list is periodically reviewed and updated because the information to be backed up may vary.
- The backup process is set up on the backup program agent to be installed on the desired computer and made over the network.
- The control of the healthy retrieval of the backup is controlled by providing the reserves.
- The physical safety of all reserves is also ensured.

5.3. Personal Data Security Breach Incidents Management

In the event that the personal data processed is seized/disclosed by third parties by unlawful means, even though all administrative and technical measures have been taken within the scope of the personal data processing activity carried out by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. ;

- Employees are primarily responsible for working in the face of personal data security breach incidents in order to respond quickly and regularly to personal data security breach incidents. In such a case, the employee is primarily obliged to notify the kvkk.info@benteler.com address.
- "Disciplinary Policy" is carried out by keeping a "Violation Notification Report" against employees who do not comply with the processes and requirements to be followed in the event that attitudes, behaviors and incidents that violate the rules and which are contrary to the provisions stated in the regulations published within the framework of the law.
- In cases where support is required from the external units or firms related to the identified event, the primary responsibility for establishing and maintaining communication is the liaison person registered with VERBIS.
- The contact person is obliged to notify the person concerned and the board within 72 hours of the violation and incident notification.
- Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. is also obliged to notify the persons affected by such data breach within a reasonable period of time by appropriate means, such as if the contact address of the person is available directly or if it is not available via the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.'s website.
- In the event that the notification cannot be made within 72 hours, Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. is obliged to inform the Board of the reasons for the delay along with the notification to be made to the Board on a justified basis.
- The "Personal Data Infringement Notification Form" published by the Board shall be used in the notification to be made to the Board.
- In cases where it is not possible to provide the information contained in the form at the same time, this information will be provided gradually without delay.
- Information, effects and measures taken by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. regarding data breaches will be recorded and the Board will be prepared for its review.

5.4. Conducting Audit Activities related to The Protection of Personal Data

The operation of the technical and administrative measures taken by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. within the scope of the protection and security of personal data are monitored and the practices that will ensure the continuation of the operation are carried out. The results of the audit activities carried out within this scope are reported to the KVK Committee and the relevant department within the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.. In line with the audit results, activities are carried out to improve and improve the measures taken for the protection of data.

6. PERSONAL DATA DESTRUCTION TECHNIQUES

At the end of the period stipulated in the relevant legislation or the retention period required for the purpose for which they are processed, personal data shall be destroyed by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. in accordance with the provisions of the relevant legislation and again upon the application of the relevant person by the following techniques.

6.1. Erasure of Personal Data

Personal data is deleted by the methods provided in Table-3.

Table 3: Erasure of Personal Data

Data Recording Environment	Description
Personal Data on Servers	For those who require storage of personal data on servers, the Information Processing Department will remove the access authority of the relevant users and delete them.
Personal Data In Electronic Media	Those whose period of time requiring the storage of electronically contained personal data will be rendered inaccessible and reusable in any way to other employees (related users) except the Information Processing Department.
Personal data in the physical environment	For those who require storage from personal data held in a physical environment, it is rendered inaccessible and reusable in any way to other employees except those responsible for the document archive. In addition, the blackout process is applied by scratching/painting/deleting it so that it is unreadable.
Personal Data in Portable Media	Those requiring storage of personal data held in flash-based storage environments are encrypted by the It Department and accessed only to the Information Processing Manager, and in secure environments with encryption keys stored.

6.2. Destruction of Personal Data

Personal data is destroyed by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. using the methods provided in Table-4.

Table 4: Destruction of Personal Data

Data Recording Environment	Description
Personal data in the physical environment	Those that require storage from personal data in a paper environment are irrevocably destroyed in paper clippers.
Personal Data in Optical/Magnetic Media	The process of physical destruction, such as melting, burning or powdering those who expire, which require

	storing from personal data in optical media and magnetic media, is applied. In addition, magnetic media is passed through a special device and exposed to a high-value magnetic field, making the data unreadable.
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6.3. Anonymizing of Personal Data

Anonymization of personal data is the rendering of personal data to be innovated in any way to identified or identifiable real person, even if it is matched with other data.

For personal data to be anonymized; personal data must be returned by the data manager or third parties and/or made unrelatable to a specific or identifiable real person, even through the use of appropriate techniques in terms of the recording environment and related area of activity, such as matching the data with other data.

7. STORAGE AND DESTRUCTION PERIOD

Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. tarafından, faaliyetleri kapsamında işlenmekte olan kişisel verilerle ilgili olarak;

- Retention periods on the basis of personal data related to all personal data within the scope of activities based on processes are stored in the Personal Data processing Inventory;
- Retention times by data categories are recorded to VERBIS;
- Process-based retention periods are included in the Personal Data Retention and Destruction Policy.

For personal data whose retention period has expired, deletion by themselves, destruction, or anonymizing is performed.

Table 5: Storage and disposal times table on process basis

PROCESS	STORAGE TIME	EXTERMINATION PERIOD
Contracts	5 years from the end of the contract term	During the first periodic disposal period following the expiration of the retention period
Personal File	10 years from the end of the employment contract	During the first periodic disposal period following the expiration of the retention period
Health Data	15 years from the end of the employment contract	During the first periodic disposal period following the expiration of the retention period
Camera Recordings	60 days	During the first periodic disposal period following the

		expiration of the retention period
Customer Information	10 years	During the first periodic disposal period following the expiration of the retention period

8. PERIODICAL DESTRUCTION PERIOD

In accordance with Article 11 of the regulation, Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. has set the period of periodic destruction as 6 months. December and June of each year, periodical destruction process is carried out in the institution.

9. DATA SUBJECT APPLICATION PROCESSES

Owners of personal data defined as the person concerned in the law are entitled to make certain requests for the processing of their personal data in Article 11 of the Act.

In accordance with the first paragraph of Article 13 of the Law; olan Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. responsible for the data must be forwarded to us in writing of applications for these rights or by other methods determined by the Board to the Data Officer in the Notification of The Application Procedures and Principles.

In this context, applications to be made to Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. as “written”, by taking the output of the application form;

- With the applicant's personal application,
- Through the notary,
- by authenticating the return by registered mail,
- Through the KEP address (bentelergebze@hs01.kep.tr)
- Through the committee's e-mail address (kvkk.info@benteler.com)

shall be forwarded to us.

10. GÖZDEN GEÇİRME

This Policy here by will be updated by the Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. KVK Committee at least once a year and updated if necessary. Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. KVK Committee is authorized and responsible for the enactment, modification, execution and repeal of this policy.

11. EFFECTIVE

This policy has been approved and enacted by the senior administration.

Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.