



TURKİS ENERJİ SANAYİ VE TİCARET A.Ş.

PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. PURPOSE

This Personal Data Storage and Destruction Policy ("Policy") has been prepared in order to determine the procedures and principles regarding the activities and operations regarding the storage and destruction activities carried out by TURKİS ENERJİ SANAYİ VE TİCARET A.Ş., its group companies and all business / joint ventures in which it has a share ("TURKİS ENERJİ").

In line with its mission, vision and fundamental principles, TURKİS ENERJİ has prioritised the processing of personal data belonging to TURKİS ENERJİ employees, employee candidates, service providers, visitors and other third parties in accordance with the Constitution of the Republic of Turkey, International Conventions, Law No. 6698 on the Protection of Personal Data ("Law") and other relevant legislation and ensuring that the relevant persons use their rights effectively.

The activities and operations regarding the storage and destruction of personal data are carried out in accordance with the Policy prepared by TURKİS ENERJİ in this direction.

2. COVERAGE

Personal data belonging to TURKİS ENERJİ's employees, employee candidates, service providers, visitors and other third parties are within the scope of this Policy, and this Policy is applied in all recording environments where personal data owned by TURKİS ENERJİ or managed by TURKİS ENERJİ are processed and in activities for processing personal data.

3. RESPONSIBILITY

All departments and employees of TURKİS ENERJİ actively support the responsible departments in taking technical and administrative measures to ensure data security in all environments where personal data is processed in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to ensure that personal data is stored in accordance with the law by duly implementing the technical and administrative measures taken by the responsible departments within the scope of the Policy, training and raising awareness of the unit employees, monitoring and continuous supervision.

Personal data are securely stored by TURKİS ENERJİ in the environments listed in Table 1 in accordance with the law.

4. LEGAL OBLIGATION

4.1. Obligation of Disclosure

Within the framework of Article 10 of the Law, the data controller is obliged to provide the following information to the data subject personally or through the person authorised by him during the acquisition of personal data:

- Identity of the data controller and its representative, if any,
- The purpose for which personal data will be processed,
- To whom and for what purpose personal data may be transferred,
- The method and legal reason for collecting personal data,
- Other rights listed in Article 11 of the Law

4.2. Obligation to Ensure Data Security

Data controller according to Article 12 of the Law on data security is responsible;

- To prevent unlawful processing of personal data
- To prevent unlawful access to personal data,
- To ensure the preservation of personal data.

5. DEFINITIONS AND ABBREVIATIONS

Recipient Group	The category of natural or legal person to whom personal data is transferred by the data controller.
Explicit Consent	Consent on a specific subject, based on information and expressed with free will.
Anonymisation	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Employee	Personnel of TURKİS ENERJİ SANAYİ VE TİCARET A.Ş., its group companies and all business / joint ventures in which it has shares (TURKİS ENERJİ)
EBYS	Electronic Document Management System(s)
Electronic Media	Media where personal data can be created, read, changed and written with electronic devices.
Non-Electronic Media	All written, printed, visual, etc. other media other than electronic media.
Service Provider	A natural or legal person who provides services within the framework of a specific contract with TURKİS ENERJİ SANAYİ VE TİCARET A.Ş., group companies and all business/name partnerships (TURKİS ENERJİ) in which it has a share.
Related Person	Natural Person Whose Personal Data is Processed
Related User	Persons who process personal data within the organisation of the data controller or in accordance with the authority and instruction received from the data controller, except for the person or department responsible for the technical storage, protection and backup of the data.
Destruction	Deletion, destruction or anonymisation of personal data.
Law	Law No. 6698 on the Protection of Personal Data.
Recording Media	All kinds of media containing personal data that are fully or partially automated or processed by non-automated means, provided that they are part of any data recording system.
Personal Data	Any information relating to an identified or identifiable natural person.
Personal Data Processing Inventory	Inventory in which data controllers detail the personal data processing activities they carry out depending on their business processes by associating them with the purposes and legal grounds for processing personal data, the data category, the group of recipients transferred and the group of data subjects, and by explaining the maximum storage period required for the purposes for which personal data are processed, the personal data foreseen to be transferred to foreign countries, if any, and the measures taken regarding data security.
Processing of Personal Data	All kinds of operations performed on personal data such as obtaining, recording, storing, retaining, changing, reorganising, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system.
Data Processor	The person who processes personal data on behalf of the data controller based on the authorisation granted by the data controller
Data Registry System	A registry system in which personal data are structured and processed according to certain criteria.

Data Controller	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data registry system.
Regulation	Regulation on Deletion, Destruction or Anonymisation of Personal Data published in the Official Gazette dated 28 October 2017.

Sensitive Personal Data	Pursuant to Article 6 of the Law, these are the data that, if known, may cause discrimination or victimisation of the persons concerned. According to the Law, such data are data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
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6. RECORDING MEDIA

Personal data are securely stored by TURKİS ENERJİ in the media listed in Table 1 in accordance with the law.

Table 1	
- Servers (domain, backup, e-mail, database, web, file sharing, etc.) Software (office software, portal, EBYS, VERBİS.) - Information security devices (firewall, intrusion detection and prevention, log files, antivirus, etc.) - Personal computers (desktop, laptop) - Mobile devices (phone, tablet, etc.) - Optical discs (CD, DVD etc.)	- Removable storage devices (USB, Memory Card, etc.) - Printer, scanner, photocopier - Paper - Manual data recording systems (questionnaire forms, visitor logbook) - Written, printed, visual media

7. PROCESSING OF PERSONAL DATA

We process Personal Data in accordance with the following principles;

- Being in compliance with the law and good faith
- Being accurate and up to date when necessary
- Processing the data for specific, explicit and legitimate purposes
- Being relevant, limited and proportionate to the purpose for which they are processed
- Storage for the period stipulated in the relevant legislation or for the period required for the purpose for which they are processed.

Processing of personal data and sensitive personal data

- Processing of personal data by obtaining explicit consent: Pursuant to the relevant legislation; explicit consent of the data subjects is required for the processing of personal data. Pursuant to the Law; explicit consent is defined as "*consent regarding a specific subject, based on information and expressed with free will*".
- Processing of personal data of sensitive nature: As mentioned in the "Definitions and Abbreviations" section numbered 5 of this Policy; personal data that have the risk of causing victimisation or discrimination when processed unlawfully are determined as "sensitive". These data are processed by TURKİS ENERJİ in cases where the explicit consent of the relevant person is obtained within the framework of the rules stipulated by the Law.
- Processing of personal data collected for human resources and employment purposes: Personal data included in the employee candidate applications collected for the purpose of employment to TURKİS ENERJİ are

processed for the purpose of examining the job application and if the relevant person consents, they are stored for 5 years in order to be evaluated in the positions to be opened in the future within TURKİS ENERJİ. The processing of personal data shared as an employee candidate is carried out in accordance with the principles and rules specified in this Policy. Personal data of employee candidates are collected in order to evaluate the suitability of the employee candidate for the open position, to confirm the accuracy of the information and documents provided by the employee candidate or to conduct research on the employee candidate, to contact the employee candidate and to improve our Human Resources Policy. In this context; The application form provided in written or electronic form is collected, processed and stored within the framework of Human Resources needs.

- Personal data of employees: Personal data of persons working within TURKİS ENERJİ are collected, processed and stored within the scope of this policy.

8. INFORMATION ON STORAGE AND DESTRUCTION OF PERSONAL DATA

Personal data belonging to employees, employee candidates, visitors and employees of third parties, institutions or organisations with whom TURKİS ENERJİ has a relationship as a service provider are stored and destroyed in accordance with the Law.

In this context, detailed explanations on storage and destruction are given below respectively.

8.1. Information on Storage of Personal Data

Article 3 of the Law defines the concept of *processing personal data*, Article 4 states that the personal data processed *must be related, limited and proportionate to the purpose for which they are processed and must be kept for the period stipulated in the relevant legislation or required for the purpose for which they are processed*, and Articles 5 and 6 list the *conditions for processing personal data*.

Accordingly, within the framework of TURKİS ENERJİ activities, personal data *are stored for the period stipulated in the relevant legislation or in accordance with our processing purposes*.

8.2. Legal Grounds Requiring Storage of Personal Data

Personal data processed within the framework of TURKİS ENERJİ's activities are kept for the period stipulated in the relevant legislation. In this context, personal data are stored according to the following legislation;

- Law No. 6698 on the Protection of Personal Data,
- Law No. 6098 on Turkish Code of Obligations,
- Law No. 4734 on Public Procurement,
- Law No. 4735 on Public Procurement Contracts,
- Law No. 5510 on Social Insurance and General Health Insurance,
- Law No. 6331 on Occupational Health and Safety,
- Law No. 4982 on Access to Information,
- Law No. 3071 on the Exercise of the Right to Petition,
- Law No. 4857 on Labour,



- Law No. 3213 on Mining
- Other laws and annexes regulating the sectors in which TURKİS ENERJİ operates and not written herein
- Regulation on Health and Safety Measures to be Taken in Workplace Buildings and their Attachments,
- The data is kept for the retention periods stipulated in the Regulations on Archival Services.

8.3. Processing Purposes Requiring Storage of Personal Data

TURKİS ENERJİ stores the personal data processed within the framework of its activities for the following purposes.

- To carry out human resources processes,
- To ensure corporate communication,
- To ensure the safety of TURKİS ENERJİ,
- To be able to do statistical studies.
- To be able to perform works and transactions as a result of signed contracts and protocols.
- Within the scope of VERBİS, to determine the preferences and needs of employees, data controllers, contact persons, data controller representatives and data processors, to organise the services provided accordingly and to update them if necessary.
- To ensure the fulfilment of legal obligations as required or obliged by legal regulations.
- To liaise with real/legal persons who have a business relationship with TURKİS ENERJİ.
- To make legal reports.
- To fulfil the obligation of proof as evidence in legal disputes that may arise in the future.

8.4. Reasons for Destruction of Personal Data

Personal data shall be deleted, destroyed upon the request of the relevant person by TURKİS ENERJİ or deleted, destroyed or anonymised ex officio in the following cases;

- Amendment or abolition of the relevant legislation provisions that constitute the basis for processing,
- The purpose requiring processing or storage no longer exists,
- In cases where the processing of personal data is carried out only on the basis of explicit consent, if the data subject withdraws his/her explicit consent,
- Pursuant to Article 11 of the Law, TURKİS ENERJİ's acceptance of the application made by the data subject regarding the deletion and destruction of his/her personal data within the framework of his/her rights,
- In cases where TURKİS ENERJİ rejects the application made to it by the relevant person with the request for deletion, destruction or anonymisation of his/her personal data, finds the response

insufficient or fails to respond within the period stipulated in the Law; the data subject files a complaint to the Authority and this request is approved by TURKİS ENERJİ,

- In the event that the maximum period required for the storage of personal data has expired and there is no condition that would justify storing personal data for a longer period of time.

9. TECHNICAL AND ADMINISTRATIVE MEASURES

Technical and administrative measures are taken by TURKİS ENERJİ within the framework of adequate measures determined and announced by TURKİS ENERJİ for sensitive personal data in accordance with Article 12 of the Law and the fourth paragraph of Article 6 of the Law for the safe storage of personal data, prevention of unlawful processing and access and destruction of personal data in accordance with the law.

9.1. Technical Measures

The technical measures taken by TURKİS ENERJİ regarding the personal data it processes are listed below:

- Risks and threats that will affect the continuity of information systems are continuously monitored as a result of real-time analyses conducted through information security incident management.
- Access to information systems and authorisation of users are carried out through access and authorisation matrix and security policies through corporate active directory.
- Necessary measures are taken for the physical security of the organisation's information systems equipment, software and data.
- In order to ensure the security of information systems against environmental threats, hardware (access control system that allows only authorised personnel to enter the system room, 24/7 monitoring system, ensuring physical security of edge switches that make up the local area network, fire extinguishing system, air conditioning system, etc.) and software (firewalls, attack prevention systems, network access control, systems that prevent malware, etc.) measures are taken.
- Risks to prevent unlawful processing of personal data are determined, technical measures are taken in accordance with these risks and technical checks are carried out for the measures taken.
- Access procedures/matrices are established within TURKİS ENERJİ and reporting and analyses are carried out regarding access to personal data.
- Access to storage areas where personal data is stored is recorded and inappropriate access or access attempts are kept under control.
- TURKİS ENERJİ takes necessary measures to ensure that the deleted personal data are inaccessible and non-reusable for the relevant users.
- In case personal data is obtained by others unlawfully, a suitable system and infrastructure has been established by TURKİS ENERJİ to notify the relevant person and the Board.
- Security vulnerabilities are monitored, appropriate security patches are installed and information systems are kept up-to-date.
- Strong passwords are used in electronic media where personal data are processed.

- Secure logging systems are used in electronic media where personal data is processed.
- Data backup programmes are used to ensure that personal data are stored securely.
- Access to personal data stored in electronic or non-electronic media is restricted according to access principles.
- Access to TURKİS ENERJİ website is encrypted using secure protocols.
- Trainings have been provided on sensitive personal data security for employees involved in sensitive personal data processing activities, confidentiality agreements have been made, and the authorisations of users who are authorised to access the data have been defined.
- Adequate security measures are taken for the physical environments where sensitive personal data are processed, stored and/or accessed, and unauthorised entry and exit are prevented by ensuring physical security.

9.2. Administrative Measures

Administrative measures taken by TURKİS ENERJİ regarding the personal data it processes are listed below:

- In order to improve the qualification of employees, trainings are provided on the prevention of unlawful processing of personal data, prevention of unlawful access to personal data, ensuring the protection of personal data, communication techniques, technical knowledge skills, Law No. 657 and other relevant legislation.
- Confidentiality agreements are signed by employees regarding the activities carried out by TURKİS ENERJİ.
- A disciplinary procedure to be applied to employees who do not comply with security policies and procedures has been prepared.
- Before starting to process personal data, TURKİS ENERJİ fulfils its obligation to inform the relevant persons.
- Personal data processing inventory has been prepared.
- Periodic and random audits are carried out within TURKİS ENERJİ.
- Information security trainings are provided for employees.

10. METHODS OF PERSONAL DATA DESTRUCTION

At the end of the period stipulated in the relevant legislation or the storage period required for the purpose for which they are processed, personal data shall be destroyed by TURKİS ENERJİ ex officio or upon the application of the relevant person in accordance with the provisions of the relevant legislation by the following techniques.

10.1. Deletion of Personal Data

Personal data are deleted by the methods given in Table 2.

Table 2

Data Recording Media	Description
Personal Data on Servers	For the personal data on the servers, deletion is made by the system administrator by removing the access authorisation of the relevant users for those whose storage period has expired.
Personal Data on Electronic Media	The personal data stored in electronic media, which expire after the period of time required for their storage, are made inaccessible and non-reusable in any way for other employees (relevant users) except the database administrator.
Personal Data on Physical Media	For the personal data kept in the physical media, it is made inaccessible and non-reusable in any way for other employees, except for the department manager responsible for the document archive, for those whose period of storage has expired. Destruction is ensured under appropriate conditions.
Personal Data on Portable Media	The personal data kept in Flash-based storage media and those whose period of storage has expired are stored in secure environments by the system administrator by giving access authorisation only to the system administrator.

10.2.Destruction of Personal Data

Personal data shall be destroyed by TURKİS ENERJİ by the methods specified in Table 3.

Table 3

Data Recording Media	Description
Personal Data on Physical Media	Those of the personal data in paper media whose period of storage has expired are irreversibly destroyed in paper shredding machines.

10.3. Anonymisation of Personal Data

Anonymisation of personal data means making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if the personal data is matched with other data.

In order for personal data to be anonymised; personal data must be rendered unassociable with an identified or identifiable natural person, even through the use of appropriate techniques in terms of the recording medium and the relevant field of activity, such as the return of personal data by the data controller or third parties and/or matching the data with other data.

11. STORAGE AND DESTRUCTION PERIODS

Regarding the personal data processed by TURKİS ENERJİ within the scope of its activities;

- Storage periods on the basis of personal data related to all personal data within the scope of the activities carried out depending on the processes in the Personal Data Processing Inventory;
- Storage periods on the basis of data categories are recorded in VERBİS;
- Storage periods on process basis are included in the Personal Data Protection and Processing Policy and are destroyed with the Material Destruction Form within the scope of the Archive Regulation.

Updates are made by TURKİS ENERJİ on the said storage periods, if necessary.

Table 4: Table of storage and destruction periods by process

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PROCESS	STORAGE PERIOD	DESTRUCTION PERIOD
Activities of TURKİS ENERGY	10 Years	At the first periodic destruction period following the end of the storage period
Preparation of contracts	10 Years Following the End of the Contract	At the first periodic destruction period following the end of the storage period
Execution of TURKİS ENERJİ Communication Activities	10 Years Following the Termination of the Activity	At the first periodic destruction period following the end of the storage period
Execution of Human Resources Procedures	10 Years Following the Termination of the Activity	At the first periodic destruction period following the end of the storage period
Log Recording Tracking Systems	2 Years	At the first periodic destruction period following the end of the storage period
Execution of Hardware and Software Access Procedures	2 Years	At the first periodic destruction period following the end of the storage period
Registration of Visitors and Meeting Participants	2 Years Following the Termination of the Activity	At the first periodic destruction period following the end of the storage period
Camera Recordings	30 Days	At the first periodic destruction period following the end of the storage period

• STORAGE AND DESTRUCTION PERIODS

Pursuant to Article 11 of the Regulation, TURKİS ENERJİ has determined the periodic destruction period as 6 months. Accordingly, TURKİS ENERJİ carries out periodic destruction in June and December every year.

12. PUBLICATION AND STORAGE OF THE POLICY

The policy is published in two different media, wet signed (printed paper) and electronic media, and is also published on the website.

13. UPDATING OF THE POLICY

The policy is updated and re-published as needed.

14. ENFORCEMENT AND REPEAL OF THE POLICY

The Policy shall be deemed to have entered into force upon its publication on TURKİS ENERJİ's website. In case it is decided to repeal the Policy, the old copies of the Policy with wet signature shall be cancelled and signed by TURKİS ENERJİ Board of Directors (by stamping the cancellation stamp or writing cancellation) and kept within the scope of



Quality Management Systems for at least 5 years. In case certain articles of the Policy are renewed, the effective date and version shall be updated on the website.