

**AVEC TURİZM OTELCİLİK CONSTRUCTION AND TRADE INC.
PERSONAL DATA RETENTION AND DISPOSAL POLICY**

ARTICLE 1- PURPOSE

Personal data storage and destruction policy has been prepared in order to determine the procedures and principles regarding the storage and destruction of personal data processed by **AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.**

ARTICLE 2- SCOPE

Personal data of company employees, employee candidates, product or service buyers, visitors, suppliers are within the scope of this policy.

This policy is applied in all recording medium where personal data owned or managed by the company are processed, and in activities for personal data processing.

ARTICLE 3- DEFINITIONS

Recipient group:	The natural or legal person category to which personal data is transferred by the data controller.
Explicit consent:	Consent about a specific subject, based on information and expressed with free will
Anonymization:	Making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching with other data
Employee:	Company personnel
Electronic media:	Environments where personal data can be created, read, changed and written with electronic devices
Non-electronic media:	All written, printed, visual etc. media other than electronic media
Service provider:	Real or legal person who provides services within the framework of a certain contract with the company
Contact Person:	Natural person whose personal data is processed
Relevant user:	Persons who process personal data within the organization of the data controller or in line with the authorization and instruction received from the data controller, excluding the person or unit responsible for the technical storage, protection and backup of the data
Destruction:	Deletion, destruction or anonymization of personal data
Law :	Law on Protection of Personal Data No. 6698
Recording medium:	Any medium where personal data is fully or partially automated or processed by non-automatic means, provided that it is a part of any data recording system.
Personal data:	Any information relating to an identified or identifiable natural person.

Personal data processing inventory:	Personal data processing activities carried out by data controllers depending on their business processes; The inventory they have created by associating the personal data processing purposes and legal reason, the data category, the transferred recipient group and the data subject group by explaining the maximum storage period required for the purposes for which the personal data is processed, the personal data planned to be transferred to foreign countries and the measures taken regarding data security
Personal data:	Any information relating to an identified or identifiable natural person
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Processing of personal data:	Obtaining, recording, storing, storing, changing, rearranging, disclosing, transferring, taking over, making available, classifying personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system or all kinds of operations performed on the data, such as preventing its use or use
Board:	Personal Data Protection Board
Personal data of special nature:	Data about people's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, biometric and genetic data
Periodic destruction:	In the event that all of the personal data processing conditions in the law are eliminated, the deletion, destruction or anonymization process that will be carried out ex officio at repetitive intervals and specified in the personal data storage and destruction policy
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Policy:	Personal Data Retention and Disposal Policy
Company:	AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.

Product and service buyer:	Customer
Data processor:	The natural or legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller
Data registration system:	The registration system in which personal data is processed and structured 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 recording system
Data controllers' registry information system:	An information system created and managed by the Presidency, accessible over the internet, to be used by data controllers in their application to the Registry and other related transactions
VERBIS :	Data Controllers Registry Information System
Regulation :	Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28 October 2017

ARTICLE 4- RESPONSIBILITIES AND DUTIES

All employees and units of the company provide full and active support to the units responsible for obtaining, processing and storing personal data in accordance with the law. All employees and units support the units in the implementation of the administrative and technical measures taken within the scope of the policy, in the training of the unit employees, in raising, increasing and monitoring the awareness of the employees, in the prevention of unlawful access to personal data and in the preservation of personal data in accordance with the law.

The distribution of the titles, units and job descriptions of those involved in the storage and destruction processes of personal data is shown in APPENDIX TABLE: 1.

ARTICLE 5- RECOEDING MEDIUM

Personal data is kept safely by the company in the medium listed in APPENDIX TABLE: 2, in accordance with the law.

ARTICLE 6- LEGAL REASONS FOR KEEPING

Personal data processed within the framework of the activities in the company are kept for the period stipulated in the relevant legislation and within the scope of the relevant legislation. The reasons for keeping it in this context are as follows:

- a- When storing personal data as it is directly related to the establishment and performance of contracts,
- b- Storing personal data for the purpose of establishing, exercising or protecting a right
- c- It is obligatory to keep personal data for the legitimate interests of the company, provided that it does not harm the fundamental rights and freedoms of individuals.
- d- Storing personal data for the purpose of fulfilling any legal obligations of the company
- e- The legislation clearly stipulates the storage of personal data

- f- Explicit consent of data owners in terms of storage activities that require the explicit consent of data owners.

ARTICLE 7- PROCESSING OBJECTIVES REQUESTING STORAGE

The Company may process the personal data of the data subject or third parties specified by the data subject for various purposes, including but not limited to:

- a- Fulfilling the obligations arising from the employment contract and legislation for the employees
- b- Management of goods and services procurement processes
- c- Follow-up and execution of legal affairs
- d- Execution of activities in accordance with the legislation
- Conducting e-communication activities
- f- Execution of fringe benefits and benefits processes for employees
- g- Creation and follow-up of visitor records
- h- Execution of occupational health and safety activities
- i- Providing information to authorized persons, institutions and organizations
- j- Performance of the service
- k- Ensuring physical space security
- l- Execution of accounting activities
- m- Execution of payment activities
- n- For the purpose of surveying the person who buys the product or service.
- o- Execution of the application processes of employee candidates
- p- Conducting training activities
- q- Planning of human resources processes
- r- Execution of management activities
- s- Execution of finance and accounting works

ARTICLE 8- LEGAL REASONS FOR DISPOSAL

Personal data is deleted or destroyed by the company on the request of the person concerned or ex officio in the following situations:

- a- Changing or removing the provisions of the relevant legislation that form the basis for the processing of personal data
- b- The disappearance of the purpose that requires the processing or storage of personal data
- c- In cases where the processing of personal data takes place only on the basis of express consent, the person concerned withdraws their explicit consent.
- d- In accordance with Article 11 of the Law, the application made by the data controller regarding the deletion and destruction of personal data within the framework of the rights of the person concerned is accepted by the data controller.
- e- The maximum period for keeping personal data has passed and there is no condition to justify keeping personal data for a longer period of time.

ARTICLE 9- TECHNICAL MEASURES

The technical measures taken by the company regarding the personal data it processes are as follows:

- a- Current anti-virus systems are used
- b- Encryption is done
- c- Special quality personal data transferred in portable memory, CD, DVD media are encrypted and transferred
- d- Destruction of personal data in a way that cannot be recycled and does not leave audit trails. provided
- e- Pursuant to Article 12 of the Law, all kinds of digital media where personal data are stored, information protected by encrypted methods to meet security requirements

g- Network security and application security are ensured.

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- e- Pursuant to Article 12 of the Law, all kinds of digital media where personal data are stored are protected with encrypted methods to meet information security requirements
- f- Network security and application security are ensured.

ARTICLE 10- ADMINISTRATIVE MEASURES

The administrative measures taken by the company regarding the personal data it processes are as follows:

- a- Necessary security measures are taken regarding entry and exit to physical environments containing personal data.
- b- The physical environments containing personal data are secured against external risks.
- c- The security of environments containing personal data is ensured
- d- There are disciplinary regulations that include data security provisions for employees.
- e- Institutional policies on e-access, information security, use, storage and destruction have been prepared and started to be implemented.
- f- Confidentiality commitments have been made
- g- The authorizations of the employees who have a change in duty or quit the job are canceled in this field.
- h- Signed contracts contain data security provisions
- i- Personal data security is monitored
- j- In case the processed personal data is obtained by others unlawfully, the Company informs the relevant person and the Board as soon as possible.
- k- Regarding the sharing of personal data, the Company signs a framework agreement on the protection of personal data and data security with the persons with whom personal data is shared, or ensures data security with the provisions added to the current agreement.

ARTICLE 11- METHODS OF DELETING PERSONAL DATA

Personal data is deleted by the methods specified in APPENDIX TABLE: 3.

ARTICLE 12- METHODS OF DESTRUCTION OF PERSONAL DATA

Personal data is destroyed by the methods specified in APPENDIX TABLE: 4.

ARTICLE 13- STORAGE AND DISPOSAL TIMES

While determining the storage period of personal data by the company; first of all, if a period of time is stipulated in the legal legislation regarding the storage of the personal data in question, this period shall be complied with. Apart from this The storage and disposal time table in APPENDIX TABLE 5 is taken as basis.

ARTICLE 14- PERIODIC DISPOSAL PERIOD

The company performs periodic disposal in June and December every year.

ARTICLE 15- PUBLISHING, STORING AND UPDATING THE POLICY

The policy is published with a wet signature (printed paper) and the printed copy is kept within the company. The policy is reviewed as needed and the necessary sections are updated.

ARTICLE 16- EFFECTIVENESS and IMPLEMENTATION

The policy is deemed to have entered into force after it is signed by the authorized person of the company. If cancellation is decided, old copies of the policy with wet signatures are canceled and signed (with an annulment stamp or written cancellation) and kept by the company for at least 5 years.

This Policy entered into force on 26.12.2022. In case the whole or certain articles of the Policy are updated, the updates become effective on the date they are published. The policy is published on <https://nicole.com.tr/> in its most up-to-date version.

In case of inconsistency between the provisions of the Personal Data Protection Law and other relevant legislation and this Policy, the provisions of the Personal Data Protection Law and other relevant legislation will be applied first.

APPENDIX TABLE: 1 Task distribution of storage and disposal processes

TITLE	UNIT	OBLIGATION
Company owner	Company	Responsible for the employees to act in accordance with the policy.
Company owner	Company	Responsible for the preparation, development, execution, publication and updating of the policy.
Company owner	Company	Responsible for providing the technical solutions needed in the implementation of the policy.
Company owner	Company	Responsible for the execution of the Policy in accordance with its duties.

APPENDIX TABLE: 2 Personal Data Storage Medium

Electronic Media	Non-electronic Media
Personal Computers Mobile Phones Printers, scanners photocopy machines Flash memory	Papers Written and published medium Visual recordings Manual Data entry systems

APPENDIX TABLE: 3 Methods of Deletion of Personal Data

Data Entry Medium	Deletion Method
Electronic Media	Among the personal data in the electronic environment, the ones that need to be kept are made inaccessible and non-reusable in any way for other employees (related users) except the database administrator.
Physical Media	Among the personal data kept in the physical environment, the ones whose period has expired are rendered inaccessible and non-reusable for other employees, except for the person responsible for the document archive. In addition, the process of blackening is applied by drawing/painting/erasing in a way that cannot be read.
Movable media	Of the personal data kept in flash-based storage media, the expired personal data is encrypted by the company owner and the access authorization is given only to the system administrator, and are stored in secure environments with encryption keys.

APPENDIX TABLE: 4 Methods of Destruction of Personal Data

Data Entry Medium	Destruction Methods
Physical media	Of the personal data in the paper environment, the ones that need to be kept are irreversibly destroyed in the document shredders.
Optical or magnetic media	The physical destruction of the personal data in optical media and magnetic media, such as melting, burning or pulverizing, is applied. In addition, magnetic media is passed through a special device and exposed to a high magnetic field, making the data on it unreadable.

APPENDIX TABLE 5 : Storage and Disposal Time Table

Item No.	Data Type	Document involving data	DURATION OF STORAGE	DURATION OF DISPOSAL
1	Identity	Identity card sample, Family status statement, Passport photo, Customer Registration form, Confidentiality commitments, Employment contracts	1 year from the processing of the Data received from the Visitor / 20 years from the processing of the data received from the Customer / 10 years from the end of the employee's employment relationship / for the supplier employee, 10 years from the expiration of the supplier agreement / for the supplier representative, 10 years from the expiration of the supplier agreement	180 days after the expiry of the storage period
2	Medical Info	Medical report	1 year from the receipt and processing of the data from the Visitor / 10 years from the end of the employment relationship of the employee / the health report of the employees, at least 15 years from the end of the employment relationship	180 days after the expiry of the storage period
3	Philosophical belief, religion, sect and other beliefs	Identity card example	1 year from the receipt and processing of the Data from the Visitor / 20 years from the processing of the data received from the Customer / 10 years from the termination of the employee's employment relationship	180 days after the expiry of the storage period
4	Communication	Forms, Customer Registration form, Employment contracts	20 years from the receipt and processing of the data from the Customer / 10 years from the end of the employee's employment relationship / for the supplier employee, 10 years from the expiration of the supplier agreement / for the supplier representative, 10 years from the expiration of the supplier agreement	180 days after the expiry of the storage period
5	Customer transaction	Surveys, financial and payment documents	20 years from the receipt and processing of the data from the Customer	180 days after the expiry of the storage period
6	Personal file	Identity card sample, curriculum vitae, Military status document	1 year from the processing of the data from the employee candidate / 10 years from the end of the employee's employment relationship	180 days after the expiry of the storage period
7	Criminal conviction and	Criminal record	1 year from the end of the employee's employment relationship	180 days after the expiry of the storage period

	security measures			
8	Work experience	Education information, Diplomas and certificates	10 year from the end of the employee's employment relationship	180 days after the expiry of the storage period
9	Other Info	Military status information	10 year from the end of the employee's employment relationship	180 days after the expiry of the storage period
10	Finance	Family status statement, payrolls, Employment contracts, customer transaction, supply contracts	10 years from the termination of the employee's employment relationship / for the supplier representative, 10 years from the expiration of the supplier agreement	180 days after the expiry of the storage period
11	Legal transaction	Lawsuit and enforcement file information of employees	10 year from the end of the employee's employment relationship	180 days after the expiry of the storage period
12	Physical space security	Image and sound records	15 days after acquisition	7 days after the end of the storage period
13	Curriculum Vitae	Curriculum Vitae	15 days after acquisition	180 days after the expiry of the storage period

26.12.2022

AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.