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SUBJECT:	POLICY CONCERNING STORAGE AND DESTRUCTION OF PERSONAL DATA		

1. PURPOSE

The purpose of this policy is to set forth the procedures and principles for the storage and destruction of personal data which are in possession of our Company, in its capacity as data controller, in accordance with the Constitution of the Republic of Turkey, international conventions, the Law No. 6698 on Protection of Personal Data and other applicable legislation.


The acts and transactions regarding the storage and destruction of personal data shall be performed pursuant to the Policy prepared by our Company in this respect.

2. SCOPE

This Policy covers the personal data belonging to Company's employees, employee candidates, interns, suppliers/vendors, customers, service providers, visitors and other third parties, and this Policy shall be applicable to all recording media used for the purpose of processing the personal data, which are owned or controlled by the Company, as well as to all activities regarding processing of personal data.

The Policy has been prepared by taking into consideration the Law No. 6698 on the Protection of Personal Data and other legislation regarding personal data and the international regulations in this field.


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3. DEFINITIONS AND ABBREVIATIONS

- Explicit Consent : Consent in relation to a specific matter, which is given upon being informed and of one's own free will.
- Anonymization : The process of rendering it impossible for personal data to be associated with any identified or identifiable natural person in any way, even if the personal data are matched with other data.
- Employee : Company personnel.
- Law : Law No. 6698 on the Protection of Personal Data.
- Personal Data : Any information relating to an identified or identifiable natural person.
- Data Subject (Relevant Person) : The natural person whose personal data are processed.
- Processing of Personal Data : Any transaction carried out on the data, such as obtaining, recording, storing, retaining, altering, reorganizing, disclosing, transferring or taking over the data, making the data available, classifying the personal data, or preventing their usage, by fully or partly automatic means, or by non-automatic means provided that they are part of a data recording system.

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Personal Data Processing Inventory : The inventory where data controllers give details of their personal data processing activities which are carried out according to their business processes, the purpose and legal ground for/on which they process personal data, the maximum period of retention of personal data necessary for the purposes of processing them, which is determined based on the data category, data subject group and the recipient group the personal data are transferred to, the personal data envisaged to be transferred to foreign countries, and the measures taken regarding data security.

PDP Board : Personal Data Protection Board

Special Categories of Personal Data: : Data of persons in relation to their race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and their biometric and genetic data.

Periodical Destruction : The procedure of deletion, destruction or anonymization of personal data to be carried out ex officio at recurrent intervals as specified in the policy on storage and destruction of personal data, in the case that none of the conditions necessitating the processing of personal data as specified under the Law on Protection of Personal Data is applicable any more.

Policy : TATMETAL's Policy Concerning Storage and Destruction of Personal Data

Company : TATMETAL Çelik Sanayi ve Ticaret A.Ş.

Data Processor : Natural or legal person that processes personal data on behalf of the data controller based on the authority granted by the data controller.


Data Controller : TATMETAL Çelik Sanayi ve Ticaret A.Ş.

Regulation : Regulation Regarding the Deletion, Destruction or Anonymization of Personal Data, which entered into force upon being published in the Official Gazette no. 30224, dated 28.10.2017.

4. RESPONSIBILITY AND DIVISION OF DUTIES

All departments and employees of the Company shall actively support responsible units in proper implementation of technical and administrative measures taken within the scope of the Policy,

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provision of training to department employees for the purpose of raising their awareness and monitoring and constant supervision thereof, prevention of unlawful processing of personal data, prevention of unlawful access to personal data, and taking of technical and administrative measures to ensure data security in all media where personal data are processed in order to make sure that personal data are retained lawfully.

The Company is responsible for preparing, improving, enforcing and updating the Policy. The Company shall fulfil this responsibility by acting in the capacity of Data Controller. Data Controller shall review this Policy when necessary to determine whether or not it is up to date and whether or not it needs improvement. Publication of the prepared document on the Company's website and its circulation within the Company shall be the responsibility of the Data Controller.

General Manager of the Company is the senior position in charge of supervising the enforcement and implementation of this Policy, making sure that the employees act in compliance therewith, and determination and performance of notification, investigation and sanction mechanisms in the case of breach of the rules and regulations.

Manager of IT Department is responsible for implementing technical solutions and practices needed for enforcement of the Policy.

Manager of the Human Resources Department and the Managers of Sales, Purchase, Accounting, Finance and Logistics departments and other relevant departments are responsible for carrying out their duties in accordance with the Policy.

5. RECORDING MEDIA

The Company shall safely retain personal data it acquires during its activities, in electronic and non-electronic media in accordance with their legal retention periods and the law.

Electronic Media: Databases (e-mail databases, file sharing, web, backup, etc.), software, portable devices (hard disk, USB memory stick, etc.), application automation systems, cloud environments.


Non-electronic Media: Folders, files, archive rooms.

6. EXPLANATIONS REGARDING STORAGE AND DESTRUCTION

Personal data belonging to the employees, employee candidates, visitors, and employees of third party natural persons, institutions or organizations that are service providers of the Company, shall be stored and destroyed by the Company in accordance with the Law.

Detailed explanations regarding the storage and destruction operations in this regard are listed below.

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6.1. Explanations Regarding Storage

The concept of processing of personal data is defined in article 3 of the Law, whereas article 4 stipulates the requirement for personal data to be related, limited and proportionate to the purposes for which they are processed, and to be retained for the duration that is stipulated in the relevant legislation or that is necessary for the purposes for which they are processed, and articles 5 and 6 of the Law stipulates the conditions that are required to be met for processing personal data.


Accordingly, the personal data processed within the scope of our Company's activities are retained for a period that is prescribed by the relevant legislation or that is appropriate in terms of the purposes for which we process them. If there is no period prescribed in the applicable legislation for the personal data that are processed, personal data shall be retained for a period necessary for the purposes for which they are processed.

6.1.1. Legal Grounds Necessitating Storage

The personal data processed within the scope of the activities carried out within the Company are retained for a period prescribed in the applicable legislation. In this context, personal data are retained for periods of storage as prescribed in the following laws;

- Law No. 6698 on the Protection of Personal Data,
- Turkish Code of Obligations No. 6098,
- Turkish Commercial Code No. 6102,
- Tax Procedure Law No. 213,
- Social Security and General Health Insurance Law No. 5510,
- Law No. 5651 on Regulation of Publications on the Internet and Fighting Against Crimes Committed by Means of Such Publications,
- Occupational Health and Safety Law No. 6331,
- Right to Information Act No. 4982,
- Law No. 3071 on Exercising Right to Petition,
- Labour Law No. 4857,
- Higher Education Law No. 2547,
- Law No. 2828 on Social Services,
- Law No. 6356 on Trade Unions and Collective Bargaining Agreements,

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and other secondary legislation that is enacted based on these laws and is in force.

6.1.2. Purposes of Processing that Necessitate Storage

The Company retains the personal data it processes within the scope of its activities in line with the following purposes.


- Conducting human resources processes.
- Carrying out marketing, sales, after-sales services, purchase, logistics, investment, finance, accounting and other business processes.
- Maintaining corporate communications.
- Ensuring Company's security and physical site security.
- Carrying out information security activities.
- Carrying out activities for occupational health and safety.
- Conducting statistical studies.
- Performing procedures and transactions that are required as a result of executed agreements and protocols.
- Ensuring fulfilment of legal obligations as required or prescribed to be mandatory by the applicable legislation.
- Communicating with natural/legal persons that are in a business relationship with the Company.
- Preparing legal reports.
- Fulfilling the obligation of providing evidence in legal disputes that may arise in the future.

6.2. Reasons Necessitating Destruction

Personal data shall be deleted, destroyed or anonymized by the Company either upon the request of the data subject or *ex officio*, if;

- The applicable legislation provisions that constitute the basis for processing personal data are amended or repealed,
- The purpose that necessitates processing and storage of personal data ceases to exist,
- Personal data are processed solely based on explicit consent and the data subject revokes their explicit consent,

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- The Company accepts the application of the data subject made for deletion and destruction of their personal data within the framework of their rights pursuant to article 11 of the Law,
- The Company rejects the application of the data subject requesting the deletion, destruction or anonymization of their personal data, or the data subject finds the answer given by the Company insufficient or no answer is given by the Company within the period prescribed by the Law, and the data subject files a complaint with the Board and this complaint is found acceptable by the Board,
- Maximum period that necessitates retention of personal data expires and there is no condition that justifies retention of personal data any longer.

7. TECHNICAL AND ADMINISTRATIVE MEASURES


The Company takes technical and administrative measures for ensuring retention of personal data in a secure manner, prevention of any unlawful processing thereof and unauthorized access thereto, and lawful destruction of personal data.

7.1. Technical Measures

The technical measures taken by the Company in relation to the personal data it processes are as follows:

- Network security and application security are ensured.
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems.
- Access logs are regularly taken.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Necessary security measures are taken regarding the entry to-exit from physical sites containing personal data.
- Security of physical sites containing personal data is ensured against external risks (fire, flood, etc.).
- Personal data are backed up and the backed up personal data are protected.
- User account management and authorization control system are implemented and are monitored.
- In-house periodic and/or random inspections are carried out and procured to be carried out.

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- Log records are taken in a way that will not allow user intervention.
- Cyber security measures are taken and their implementation is constantly monitored.

7.2. Administrative Measures


The administrative measures taken by the Company in relation to the personal data it processes are as follows:

- Disciplinary regulations containing data security provisions are in place with respect to the employees.
- Training and awareness-raising activities on data security are organized at regular intervals for the employees.
- An authorization matrix has been created for the employees.
- Corporate policies have been prepared and started to be implemented on the topics of access, information security, usage, storage and destruction.
- Letters of undertaking for confidentiality/privacy are obtained.
- Authorizations of the employees who are reassigned or whose employment is terminated are immediately revoked.
- The executed agreements contain provisions on data security.
- Additional security measures are taken for personal data that are transferred in hard copy and the relevant documents are sent after being marked as classified.
- Personal data security policies and procedures have been determined.
- Personal data security issues are reported forthwith.
- Security of personal data is monitored.
- Current risks and threats have been identified.
- Protocols and procedures regarding security of special categories of personal data have been determined and are being implemented.

8. TECHNIQUES USED IN DESTRUCTION OF PERSONAL DATA

At the end of the period prescribed in the applicable legislation or the period of retention necessary for the purpose for which they are processed, personal data shall be destroyed by the Company in line with the provisions of the relevant legislation through the use of the following techniques either *ex officio* or upon the application of the data subject.

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8.1. Deletion of Personal Data

Personal data the retention period of which expires shall be lawfully deleted by using the methods specified in **Table 1** once their retention period expires.

Table 1. Methods for Deletion of Personal Data


Personal Data Stored on Servers	:	Personal data retention period of which expires shall be deleted by the system administrator who shall also revoke the access authorization of relevant users.
Personal Data Stored Electronically	:	Personal data retention period of which expires shall be rendered unavailable and non-reusable by the system administrator who shall revoke the access authorization of relevant users.
Personal Data Stored in Physical Media	:	Personal data which are contained in physical media and retention period of which expires, shall be made completely unavailable to and non-reusable by relevant users. Moreover, they may also be obscured to make them unreadable by striking through/painting over/deleting them.
Personal Data Stored in Portable Devices (such as USB, Hard disk, CD, DVD)	:	Personal data which are stored in portable devices and retention period of which expires, shall be retained in the media that contain them, in an encrypted form in order to prevent the relevant users' access thereto.

8.2. Destruction of Personal data

Personal data the retention period of which expires shall be lawfully destroyed by using the methods specified in **Table 2** once their retention period expires.

Table 2. Personal Data Destruction Methods

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Personal Data Stored in Physical Media	:	Personal data which are stored in physical media and retention period of which expires, shall be destroyed either by being shredded in a paper shredder or by being burned.
Personal Data Stored in Cloud Environments	:	Personal data stored in cloud environments shall be encrypted by using cryptographic methods during their retention and usage. Personal data which are stored in cloud environments and retention period of which expires shall be destroyed by destruction of the encryption keys used.
Personal Data Stored on Peripheral (Network Devices, Flash-based Media, Optic Systems, etc.) and Local Systems	:	Personal data which are stored on peripheral networks and local systems and retention period of which expires, shall be destroyed by application of physical processes such as melting, burning and disintegrating. Moreover, they are rendered unreadable and non-reusable by being demagnetized and by using special software.

8.3. Anonymization of Personal Data

Anonymization of personal data is the process of rendering it impossible for personal data to be associated with any identified or identifiable natural person in any way, even if the personal data are matched with other data.

In order for personal data to be considered anonymized; it should become impossible for the data controller or third parties to associate such personal data with an identified or identifiable natural person, even by using techniques appropriate in terms of the recording medium and the relevant field of activity, such as data recovery and/or matching the data with other data.


9. PERIODS OF STORAGE AND DESTRUCTION

With respect to personal data processed by the Company within the scope of its activities;

- The retention periods for all personal data processed within the scope of the activities performed in relation to the processes, on the basis of different personal data, are contained in the Personal Data Processing Inventory;
- Retention periods on the basis of data categories are provided at VERBIS (Data Controllers' Registry Information System) registration; and
- Retention periods on the basis of processes are contained in the Personal Data Storage and Destruction Policy.

The retention periods in question shall be updated by the Company, when required.

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The Company shall delete, destroy or anonymize the personal data the retention periods of which expire, *ex officio*.

Retention and destruction periods of personal data are presented in **Table 3**.


Table 3. Periods of Retention and Destruction of Personal Data

PROCESS		PERIOD OF RETENTION	PERIOD OF DESTRUCTION
Performance of Human Resources Processes	:	10 years after the employee's employment is terminated	In the first periodic destruction process following the expiry of retention period
Performance of Processes for Selecting Employee Candidates	:	10 years following the job application date	In the first periodic destruction process following the expiry of retention period
Performance of Contractual Procedures	:	10 years following the expiry/termination of the Contract	In the first periodic destruction process following the expiry of retention period
Camera Recordings	:	1-6 months	In the first periodic destruction process following the expiry of retention period
Visitors' Records	:	5 years	In the first periodic destruction process following the expiry of retention period
Log Record Monitoring Systems	:	2 years	In the first periodic destruction process following the expiry of retention period

10. PERIODIC DESTRUCTION INTERVAL

Pursuant to Article 11 of the Regulation, the Company has set the periodic destruction interval as 6 months. Accordingly, a periodic destruction process is carried out in the Company in the months of June and December every year.

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11. PUBLICATION AND SAFEKEEPING OF THE POLICY

The Policy shall be published in two different forms, one being as a hard copy with wet signature and the other in electronic medium, and made available to the public on the website. The hard copy version shall also be kept in the Data Controller’s file.

12. INTERVALS IN WHICH THE POLICY WILL BE UPDATED

The Policy shall be reviewed as and when required and the necessary sections thereof shall be updated.

13. ENFORCEMENT AND ABOLITION OF THE POLICY

The Policy shall be deemed to have entered into force upon its publication on the Company’s website. In the case that it is decided to be abolished, the previous copies of the Policy with wet signature shall be cancelled and kept at least for a period of 5 years.

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