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PROCEDURE ON IMPLEMENTATION POLICY FOR PROTECTION, KEEPING AND DESTRUCTION OF PERSONAL DATA

PROCEDURE ON IMPLEMENTATION POLICY FOR PROTECTION, KEEPING AND DESTRUCTION OF PERSONAL DATA

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		Marine Sector		Industry and Certification Sector	
General Manager	X				
Quality Management Division	X	New Building Division	X	Operation Division	X
External Affairs Division	X	Ships in Service Division	X	Project Control Division	X
Business Development Division	X	Plan Approval and Engineering Division	X	Business Assurance Division	X
Human Resources & Administrative Services Management	X	Rule Development and Statutory Legislation Division	X		
Information Technology Services Management	X	Qualification and Training Division	X		
Financial Affairs and Customer Services Management	X	Port State Control Department	X		

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Signature	Signature	Signature	Signature

Form No: KA01-09/ 13.02.2018

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REVISION TABLE

Rev. No	Rev. Date	Revision Made	Revised by
1	22.06.2020	Articles 3, 5.1, 5.8, 5.9, 6 and 10 are revised. Articles 5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.7, 5.1.8, 5.1.9, 5.1.10, 5.1.11, 5.1.12, 5.1.13, 5.1.14, 5.1.15, 5.1.16, 5.1.17, 5.1.18 are added.	E. TÜFEKÇİ
2	16.06.2020	Item 5.1.17 deleted. Items 5.2, 6, 7 and 8 were revised.	E. TÜFEKÇİ

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PROCEDURE ON IMPLEMENTATION POLICY FOR PROTECTION, KEEPING AND DESTRUCTION OF PERSONAL DATA

1. PURPOSE

The purpose of this Procedure is particularly to determine the maximum period of time regarding keeping, anonymizing and deleting of the personal data which are necessary for the purposes for which such personal data are processed for and to determine the relevant processes concerning the anonymization, deleting and destruction of the personal data, pursuant to “6698 numbered Law on Protection of Personal Data” (“LPPD”) and pursuant to the “Regulation on Deletion, Destruction or Anonymization of Personal Data” enacted by basing on the LPPD and to fulfill the obligations as stipulated in the said legislations and to define and determine the implementation rules and principles of the Personal Data Keeping and Destruction Policy of Türk Loydu Uygunluk Değerlendirme Hizmetleri A.Ş. trade named company, with its capacity of the Data Supervisor, for the purpose of informing the data subjects about the foregoing processes.

2. SCOPE OF APPLICATION

This Procedure is implemented in the entire departments of Türk Loydu.

3. DEFINITIONS AND ABBREVIATIONS

Company:	Türk Loydu Uygunluk Değerlendirme Hizmetleri A.Ş
Explicit Consent:	The consent related with a particular matter and based on being informed and declared with a free will,
Anonymization:	An operation in which the personal data is converted and transformed into a form that cannot be associated or linked with any identified or identifiable natural person by no means, even if such personal data were matched with another data,
Physical Destruction:	Physical destruction of the optical and magnetic media via melting, burning or pulverizing such media,
Destruction:	Deletion, destruction or anonymization of the personal data,
Relevant User:	The persons who are processing the personal data within the organization of the data supervisor or by basing on and in line with the powers and instructions granted by the data supervisor, except the persons or the units which are responsible for storing, safeguarding and back-up of the data in technical terms,
Law:	6698 numbered Law on Protection of Personal Data (“LPPD”),
Committee:	The Committee for Protection of Personal Data which is working under the structure of the Agency for the Protection of Personal Data,
Recording Environment:	All kinds of environments wherein the personal data of which were processed with non-automatic means are existing, on condition that to be a part of any kinds of data recording system which is a partly or entirely an automatic or non-automatic system,
Personal Data:	All kinds of information that can be associated or linked with any identified or identifiable natural person,
Table of Keeping Personal Data:	The table which indicates the periods of time during which the personal data to be kept and maintained by the Company,



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Personal data processing inventory:

The inventory which is conveyed to the VERBİS system and which explains in detail about the personal data processing activities performed by the Data Supervisors (Process Responsible) in connection with their relevant business processes; the purposes of processing the personal data, data categories, and data created by associating with the conveyed recipient group and the person group constituting the subject-matter of that data as well as the maximum period required for the purposes of processing such personal data and about the measures taken in relation to the personal data which are stipulated to be transferred to foreign countries and the security of such personal data,

Deletion of Personal Data:

Deletion of personal data is an operation, in which the personal data cannot be accessed and used again by the relevant users under any circumstances,

Destruction of personal data:

Destruction of personal data is an operation, in which the personal data cannot be accessed, retrieved, restored and used again by anyone, under any circumstances,

Special Categories of Personal Data:

The data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics are special categories of personal data,

Periodical Destruction:

The deletion, destruction or anonymization operations to be performed ex officio, in the event that entire of the conditions as stipulated in the Law for processing of personal data do not exist any longer and in accordance with the periods that are repeating with certain intervals as specified in the maintenance and destruction policy for personal data,

Overwriting:

The operation of writing random data, comprising of 0 and 1 numbers, minimum for seven times over the magnetic media and re-writable optical media, which prevents retrieving and retracting of the former data thereon,

Data recording system:

The recording system in which the personal data are structured and processed according to the certain given criteria thereof, Data Supervisors Registration Information System kept by the Board of Protection of Personal Data,

VERBİS

Regulation:

The “Regulation on Deletion, Destruction or Anonymization of Personal Data” of which was promulgated on October 28th, 2017 dated Turkish Official Gazette.

4. RESPONSIBILITIES

General Manager, Sector Directors and Managers are responsible and liable for the duly implementation of this Procedure.



PROCEDURE ON IMPLEMENTATION POLICY FOR PROTECTION, KEEPING AND DESTRUCTION OF PERSONAL DATA

5. PROCEDURE DETAILS

- 5.1** Recording and monitoring of the forms issued within the scope of the Law on Protection of the Personal Data
- 5.1.1** Employee Disclosure Form: It is retained and maintained within the personal registry file of employee, as an annex to the employment contract, under the coordination and monitoring of the Human Resources and Administrative Services Department.
- 5.1.2** Employee Explicit Consent Form: It is retained and maintained within the personal registry file of employee, as an annex to the employment contract, under the coordination and monitoring of the Human Resources and Administrative Services Department.
- 5.1.3** Disclosure Form regarding the Processing of Personal Data (Dependent persons of employees who are 18 and above age- Special Health Insurance): It is retained and maintained within the personal registry file of employee, under the coordination and monitoring of the Human Resources and Administrative Services Department.
- 5.1.4** Written Consent regarding the Processing of Personal Data (Dependent persons of employees who are 18 and above age – Special Health Insurance): It is retained and maintained within the personal registry file of employee, under the coordination and monitoring of the Human Resources and Administrative Services Department.
- 5.1.5** Personal Data Inventory Table: This inventory is prepared by the relevant Sectors and Departments and then consolidated and recorded by the Human Resources and Administrative Services Department and thereafter conveyed into the VERBİS system's records.
- 5.1.6** Candidate Employee Disclosure Form: It is included into the contents of the Job Application Form and included into the relevant pages of the career portals that are used for searching the candidate database, under the coordination and monitoring of the Human Resources and Administrative Services Department.
- 5.1.7** Instruction Contract regarding the Obligations of Protection of Personal Data and Ensuring their Security and Confidentiality: Depending on all kinds of contracts to be executed by the Sectors and Departments, this is a contract to be executed with the organizations to which the personal data are to be transferred and it is issued as a supplement to the master contract related with the provided and/or received services and kept and retained in the master contract's file.
- 5.1.8** Personal Data Transfer Contract (1): Depending on all kinds of contracts to be executed by the Sectors and Departments, this is a contract to be executed with the organizations to which the personal data are to be transferred to our Company and it is kept and retained as a supplement to the master contract. The procedures related with the execution of a Personal Data Transfer Contract are defined in the "PPD Inventory Summary Table for Keeping and Destruction Periods" attached herein.
- 5.1.9** Personal Data Transfer Contract (2): This is a contract to be executed with the career portal management companies, that are used for searching the candidate database during the recruitment process and it is monitored by the Human Resources and Administrative Services Department.
- 5.1.10** Layered Camera Disclosure Form: This is a disclosure form related with the surveillance camera records installed in the service building of the Company. The Human Resources and Administrative Services Department is liable to display and place the contents of this form at certain visible points of the service building.
- 5.1.11** Surveillance Camera Disclosure Form: This is a disclosure form related with processing of the surveillance camera records captured at the common areas of our Company, for security purposes in order to detect the possible adverse situations. This form is published on the website of Company by the Information Technology Services Management.
- 5.1.12** PPD Law Application Form: This is an application form including the principles and rules of applications to be submitted by the relevant persons (data subjects) concerning their personal data. This form is published on the website of Company by the Information Technology Services Management.



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- 5.1.13** Visitor Internet Access Disclosure Form: This is a form which is required to be granted consent on an electronic environment by the visitors who access into the internet network of the Company, prior to their access. This form is uploaded to the relevant area on the electronic environment by the Information Technology Services Management.
- 5.1.14** Disclosure Form for Events: This is a content which is required to be displayed and placed at a visible point that can be seen by the participants and which is required to be photographed for evidence purposes, during all kinds of events organized and/or participated by the sectors and departments, open to the participation of third persons. The panelboard having minimum 100 x 70 cm size and affixed with the content of the Disclosure Text for that Event to be prepared by the Human Resources and Administrative Services Department is kept in the event area, by the sectors and departments that organize and/or participate in that event.
- 5.1.15** Explicit Consent Form for Events: This is an explicit consent form which is required to be obtained from the participant persons, for the processing of the personal data by way of photograph machines, cameras, microphones and etc. media, during all kinds of events organized and/or participated by the sectors and departments, open to the participation of third persons. This form is ensured to be signed by the participants of that event through the sectors and departments which organized that event and recorded accordingly.
- 5.1.16** Visitor Disclosure Form: This is a disclosure form related with processing of the statements of the persons who visit the Company concerning their identity details, physical details, security of locations and their medical conditions during the pandemic disease circumstances. The content of this form is prepared by the Human Resources and Administrative Services Department and affixed on a panelboard having minimum 100 x 70 cm size and displayed and placed at a visible point that can be seen by the visitors.
- ~~**5.1.17** Visitor Explicit Consent Form: This is a disclosure form related with processing of the medical data of the persons who visit the Company, with regard to their statements concerning with their identity details, physical details, security of locations and their medical conditions during the pandemic disease circumstances. This form is caused to be signed to every visitor by the security personnel and daily recorded by the Administrative Affairs Department.~~
- 5.1.18** Report of Destruction of Personal Data: This is a report issued for the purpose of recording of the personal data which are destructed within their relevant destruction periods as defined under this Procedure. The records of such reports are maintained and kept for 10 years of period.

5.2 Recording Environment

During the implementation of this policy, the term recording environment shall mean all kinds of environments in which the personal data exist and maintained. Company is keeping the personal data that it had processed, within the below mentioned recording environments, in accordance with the relevant legislations thereof and particularly in accordance with the “Law on Protection of the Personal Data”, by taking the most recent and up-to-date measures in relation to the data security. In this regard, the recording environments of the Company are as follows:

- **Regularly backed up information storage environments located at Information Technology system room**
- QNAP NAS
- HP MSL 6030 Library
- MYK Portal
- TL Portal
- ERP application
- Department /Unit cabinets
- Archive Cabinets



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5.3 Legal, Technical and Other Reasons which require keeping and destruction of the Personal Data

5.2.1 Processing of the personal data belonging to the data subjects.

Personal data belonging to the data subjects may be processed by the Company for the below mentioned purposes:

- Implementation of the Company's policies and arrangement of the Company's organization,
- Procurement of the services necessary for the performance of the business operations of the Company, which the Company outsourced from its suppliers,
- Fulfillment of the obligations of the Company that are arising from the applicable legislations,
- Conducting of quality and standard inspections or fulfillment of reporting and other obligations under the applicable laws and regulations by the Company,
- Recruitment of suitable employees for the open positions within the framework of the Company's human resources policies,
- Performing of the Company's operations in an efficient manner,
- Conducting of relevant evaluations regarding the received job applications, conclusion of such job applications and contacting and communicating with the job applicants, when it is deemed necessary,
- Execution and performance of the employment contract,
- Protection of the rights that arising from the employment contract and from the applicable legislations,
- Performing of the necessary transactions and procedures within the framework of relevant legislations and particularly under the Labour Law, Occupational Health and Safety Law, Social Security and General Health Insurance Law and etc.,
- Improvement of the performance level and employee satisfaction in accordance with the human resources policy,
- Inspection, controlling and monitoring by the Employer of any and all kinds of vehicles, equipment and tools, which are allocated to the employees for the performance of their duties, but also offered for their private use, both during the working hours and after hours,
- Monitoring by the Employer of the work attendance through biometric data as a part of its management and supervision rights,
- Ensuring occupational safety, general security and building security,
- Recording of all kinds of traffic information related with accesses on internet environment, pursuant to the "Law on Regulation of the Broadcasting Realized on Internet Environment and Fighting with the Offences Committed through such Broadcastings"

5.2.2 Deletion, Destruction or Anonymization of Personal Data belonging to the data subjects

The personal data belonging to the data subjects are deleted, destroyed or anonymized by the Company either ex officio or upon the request made thereof, under the below mentioned circumstances, pursuant to the Regulation.

- Amendment or abolishment of the relevant legislation provisions which are constituting a basis for the processing or keeping of the personal data,
- In case the purposes which require processing or keeping of the personal data, no longer exist,
- In case the conditions as specified in Articles 5 and 6 of the Law which require processing of the personal data, no longer exist,
- Under the circumstances, wherein processing of personal data is realized by basing on the explicit consent, taking back of such consent by the relevant person,
- Acceptance of the application made by the relevant person in relation to deletion, destruction or anonymization of his/her personal data by the data supervisor,
- Rejection of the application made by the relevant person in relation to deletion, destruction or anonymization of his/her personal data by the data supervisor, finding insufficient of the answer given



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by the relevant person by the data supervisor, or in case of failing to give an answer within the period of time as specified in the Law; making a complaint to the Committee and finding suitable of such request by the Committee.

- Elapsing of the maximum period of time which is required in order to keep the personal data and/or presence of a condition which justifies keeping the personal data for a longer period of time.

5.4 Technical and Administrative Measures which are taken in order to securely keep and process the personal data in compliance with the laws

5.4.1 Technical Measures

- Expert employees who are specialized about technical matters are being employed by the Company.
- Accessing powers are limited and such powers are being regularly reviewed.
- Virus protection systems and firewalls and relevant software and hardware are being used.
- Back-up programs are being used, which are in compliance with the laws, in order to ensure securely keeping and maintaining of the personal data.
- The accesses into the data storing areas, wherein the personal data exist are being recorded (logged) and unauthorized access or access attempts are being reported instantly.

5.4.2 Administrative Measures

- Employees are being informed and trained about the laws on protection of personal data and about processing and keeping of the personal data, in accordance with the relevant legislations.
- The employees who are authorized to process, keep and access into the personal data are designated and determined on the Personal Data Inventory.
- Employees are being informed that they are not allowed to disclose the personal data learnt by them, contrary to the provisions of LPPD and that they are not allowed to use such personal data other than their processing purposes and such obligation shall also continue after they leave their jobs at our Company. On the contracts made by and between the employees and our Company, relevant provisions are added which bring an obligation to the employees in order to not to process, disclose and use the personal data, other than the instructions given by the Company and other than the exceptions as specified in the laws and the relevant awareness about this matter is created among the employees.

5.5 Technical and Administrative Measures which are taken in order to destruct the personal data in compliance with the laws

5.5.1 Technical Measures

- Necessary software programs have been purchased, in order to create the cyber security infrastructure and other measures were taken such as firewalls and gateways.
- Updates on the software programs are being regularly performed and it is ensured for the security measures to function with a systematic manner.
- The access into the personal data which are maintained both at the physical environment and on an electronic environment is being limited and the employees who are having accessing powers are determined beforehand.
- Software such as antivirus and anti-spam are being used, which are regularly scanning the information processing system and which detects the dangers, in order to be protected against malicious software and also, such programs are kept being updated and necessary security scanning is performed accordingly.
- All of the operations made by the users are being recorded (logged).
- Problems related with security issued are detected rapidly and reported immediately to the relevant employees.



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- Physical recording environments are being protected against risks such as fire, flood and flash floods and access into such areas are being kept under control.
- The personal data being kept on an electronic environment are being regularly backed-up, against the risks of being lost and damaged.

5.4.2 Administrative Measures

- Employees are being informed and trained about the laws on protection of personal data and about destruction of the personal data, in accordance with the relevant legislations.
- The employees who are authorized to destruct the personal data are designated and determined on the Personal Data Inventory.
- Operations of keeping and destruction of the personal data that are being realized within the Company are regularly being audited.
- Technical measures taken thereof are reported to the relevant employees.
- Expert employees who are specialized about technical matters are being employed by the Company.

5.5.1 Methods used for destruction of personal data in compliance with the laws

Personal data are deleted in accordance with the environments that they were recorded on.

5.4.2 Methods of deleting of personal data

The personal data existing on the cloud systems are deleted by giving the delete command. While performing the said operation, it is given importance to the fact that, whether or not the user does not have the authority to retract and retrieve the deleted data on the cloud system. The personal data existing on the paper environment are being deleted by using the method of blackening. The said blackening operation is realized by cutting the personal data on the relevant papers, when it is possible or in the events, where it is not possible to do so, it is realized by using the fixed ink on the relevant paper, in order to make invisible and unreadable of the personal data by the relevant users, with an irreversible manner and through technological solutions thereof. Office documents existing on the central server are being deleted by giving the delete command on its operating system. The personal data existing on the portable media are deleted by way of using suitable software programs thereof.

5.4.2 Methods of destructing of personal data

The personal data existing on the local system are either physically destructed or they are destructed by way of using suitable overwriting methods thereof.

The personal data existing on the peripheral systems;

- Network Devices: Switch, router and etc. they are destructed by way of using one of the below mentioned suitable methods such as, magnetizing, physical destruction and overwriting.
- Flash-based environments: They are destructed by using the methods recommended by the relevant producers or by way of physical destruction or by way of overwriting, whichever one is suitable thereof.
- Sim Cards and Fixed Memory Cards: They are destructed by way of physical destruction or by way of overwriting, whichever one is suitable thereof.
- Optical Disks: They are destructed by way of physical destruction methods.
- Printers with fixed data recording environments, doors having access with fingerprints and etc. like peripheral units: They are destructed by way of physical destruction or by way of overwriting, whichever one is suitable thereof.

The personal data existing on the paper environment are being destructed by using the paper shredder machines



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5.5.2 Methods of anonymization of personal data

During the phase of anonymization of the personal data, one of the suitable methods is used, as specified in the Guidance for Deletion, Destruction or Anonymization of Personal Data, published by the Committee for Protection of Personal Data.

5.5.3 Authorized Officials taking part during the processes of keeping and destruction of personal data

PROCESS OWNER	DUTY	RESPONSIBILITY
Sea Sector Director	Sea Sector Responsible Official for Keeping and Destruction Policy of Personal Data	Providing and ensure signing of the Employee Disclosure Form, Employee Explicit Consent Form, Candidate Employee Disclosure Form, Instruction Contract regarding the Obligations of Protection of Personal Data and Ensuring their Security and Confidentiality, Personal Data Transfer Contract, Layered Camera Disclosure Form, PPD Law Application Form, Visitor Internet Access Disclosure Form, Disclosure Form for Events, Explicit Consent Form for Events, Visitor Disclosure Form, Visitor Explicit Consent Form, Report of Destruction of Personal Data to the relevant persons, in relation to the data processed by the sector/department he/she is responsible for; and monitoring such documents and ensuring compliance of the processed data with the keeping periods as specified under this data keeping and destruction policy and management and recording of the personal data destruction process, during periodical destruction periods.
Industry and Documentation Sector Director	Industry and Documentation Sector Responsible Official for Keeping and Destruction Policy of Personal Data	
Information Technologies Services Manager	Information Technologies Services Department- Responsible Official for Keeping and Destruction Policy of Personal Data	
Quality Management Department Manager	Quality Management Department Responsible Official for Keeping and Destruction Policy of Personal Data	
Human Resources and Administrative Services Manager	Human Resources and Administrative Services Department Responsible Official for Keeping and Destruction Policy of Personal Data	
Business Development Department Manager (External Training Services)	Business Development Department and External Training Services Unit Responsible Official for Keeping and Destruction Policy of Personal Data	
External Affairs Department Manager	External Affairs Department Responsible Official for Keeping and Destruction Policy of Personal Data	



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Financial Affairs and Customer Services Manager	Financial Affairs and Customer Services Department Responsible Official for Keeping and Destruction Policy of Personal Data	
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5.5.4 Periodical Destruction Periods

Physical and digital data of which their statutory periods for keeping and destruction have been expired are destructed on a periodical basis, by the relevant sectors and departments. The relevant sectors and departments delete, destruct or anonymize the personal data during the first periodical destruction operation, following after occurrence date of its obligation for the Company for deleting, destructing or anonymization of such personal data. Regarding the destruction operation realized thereof, İK 187- Report of Destruction of Personal Data is issued and recorded accordingly.

Periodical destruction is performed for all of the personal data, at the sectors and departments during month December of every year. The records of the operations of deletion, destruction and anonymization are kept and maintained for 10 years of period.

6. RELATED DOCUMENTS

- İK 152 Disclosure Form regarding the Processing of Personal Data (Dependent persons of employees who are 18 and above age – Special Health Insurance)
- İK 153 Written Consent regarding the Processing of Personal Data (Dependent persons of employees who are 18 and above age – Special Health Insurance)
- İK 157 Personal Data Inventory Table
- İK 174 Employee Disclosure Form
- İK 175 Employee Explicit Consent Form
- İK 176 Instruction Contract regarding the Obligations of Protection of Personal Data and Ensuring their Security and Confidentiality
- İK 177 Personal Data Transfer Contract-1
- İK 178 Personal Data Transfer Contract-2 (to be executed with the Career Portal Management Companies)
- İK 179 Layered Camera Disclosure Form
- İK 180 Surveillance Camera Disclosure Form
- İK 181 PPD Law Application Form
- İK 182 Visitor Internet Access Disclosure Form
- İK 183 Disclosure Form for Events
- İK 184 Explicit Consent Form for Events
- İK 185 Visitor Disclosure Form
- İK 186 Visitor Explicit Consent Form
- İK 187 Report of Destruction of Personal Data

7. DOCUMENTATION

All of the relevant documents are kept and maintained by the Human Resources and Administrative Services Directorate, pursuant to 6050/K **Documented Information Control** Procedure.



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8. DOCUMENT CHANGE CONTROL

The document change control of this procedure is realized by the Quality Management Department, in accordance with 6010/K Procedure and Work Instructions Writing Rules Procedure and 6050/K **Documented Information Control** Procedure.

9. WORK FLOWCHART

Not applicable.

10. APPENDIX

PPD Inventory Summary Table for Keeping and Destruction Periods.



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APPENDIX -1: PPD INVENTORY SUMMARY TABLE FOR KEEPING AND DESTRUCTION PERIODS

PPD INVENTORY SUMMARY TABLE FOR KEEPING AND DESTRUCTION PERIODS

Person group whose personal data are processed	Category of Personal Data	Processed Personal Data	Purpose of Processing	Recipient Group to which the personal data is transferred to out of company organization	Are the personal data transferred to abroad?	Period of Keeping	Will there be a data transfer contract executed? (Yes/ No)
Employee	Identity details	Photocopy of national ID card, name, surname, Turkish Identity Number	1. Conducting of emergency case processes 5. Conducting of employee satisfaction and loyalty processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Competent public institutions and organizations	No	10 years beginning from the date of leaving work	N
Employee	Personal File	Payroll slip information, disciplinary interrogations, records of entry-exit certificate of employment, CV details, performance evaluation reports and etc.	1. Conducting of emergency case processes 5. Conducting of employee satisfaction and loyalty processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities	Competent public institutions and organizations	No	10 years beginning from the date of leaving work	N

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			50. Informing the Authorized and Competent Persons, Institutions and Organizations				
Employee	Criminal convictions and security measures	Criminal Background Check	1. Conducting of emergency case processes 5. Conducting of employee satisfaction and loyalty processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	10 years beginning from the date of leaving work	N
Employee	Identity details	Name, surname, Turkish Identity Number	5. Conducting of employee satisfaction and loyalty processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights 19. Planning of human resources processes	Suppliers	No	10 years beginning from the date of leaving work	Y
Employee	Personal File	Information about starting and leaving of employment, Payroll slip information	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Courts / Enforcement Offices	No	10 years beginning from the date of leaving work	N



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Employee	Physical location security	Information about entry-exit details of the employees to the facilities	1. Conducting of emergency case processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	For the surveillance camera records-60 days; for entry-exit records, 10 years beginning from the date of leaving work	N
Employee	Location	Mobility and location data of the motor vehicles allocated by the company to the employees, fuel-oil station purchase records	1. Conducting of emergency case processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Suppliers (motor vehicle tracking software organization to which the Company works with)	No	10 years beginning from the date of leaving work	Y
Employee	Personal File	Starting and end dates of annual leaves	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	10 years beginning from the date of leaving work	N
Employee	Identity details	Name, surname	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations	Suppliers (Banks acting as intermediary for	No	10 years beginning from the date of leaving work	Y



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			7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 19. Planning of human resources processes, 44. Carrying out of the remuneration policy, 50. Informing the Authorized and Competent Persons, Institutions and Organizations	the payment of salaries)			
Employee	Personal File	Salary Details	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 19. Planning of human resources processes, 44. Carrying out of the remuneration policy, 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Yes (Banks acting as intermediary for the payment of salaries)	No	10 years beginning from the date of leaving work	Y
Employee	Personal File	Discipline Committee Records	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 16. Conducting and monitoring of the legal procedures, 17. Carrying out of the internal audits, interrogations and intelligence activities	No	No	10 years beginning from the date of leaving work	N
Employee	Personal File	Date of leaving work	1. Conducting of emergency case processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 14. Ensuring of security of the physical locations, 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	10 years beginning from the date of leaving work	N

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Employee	Contact details	Address	1. Conducting of emergency case processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights 14. Ensuring of security of the physical locations, 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Competent public institutions and organizations	No	10 years beginning from the date of leaving work	N
Employee	Identity details	Name, surname, Turkish Identity Number	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Suppliers (Insurance companies with which the Mandatory Private Pension Insurance contracts are executed)	No	10 years beginning from the date of leaving work	Y
Employee	Personal File	Payroll slip information	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Insurance companies with which the Mandatory Private Pension Insurance contracts are executed	No	10 years beginning from the date of leaving work	Y
Employee	Other	Signature	11. Conducting of the activities in compliance with the applicable legislations 12. Carrying out of the finance and accounting operations, 16. Conducting and monitoring of the legal procedures,	Trade Registry Office, Turkish Trade Registry Gazette	No	10 years beginning from the date of leaving work	N



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			20. Conducting and supervision of the business activities, 50. Informing the Authorized and Competent Persons, Institutions and Organizations, 51. Carrying out of the management activities,				
Employee	Personal File	Performance evaluation records	33. Conducting of the performance evaluation processes	-	No	10 years beginning from the date of leaving work	N
Employee	Professional Experience details	Received trainings	6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Natural persons or private law legal entities	Yes	10 years beginning from the date of leaving work	Y
Employee	Contact details	Address details, telephone numbers	21. Carrying out of Occupational Health& Safety Activities	Competent public institutions and organizations/ Suppliers (İBYS software company authorized by the Ministry of Family, Labour and Social Services)	No	15 years beginning from the date of leaving work	Y
Employee	Medical health data	Blood type data, chronic illnesses, surgical operation data, personal medical condition data (physical examinations,	21. Carrying out of Occupational Health& Safety Activities	Suppliers (İBYS software company authorized by the Ministry of Family, Labour and Social Services)	No	15 years beginning from the date of leaving work	Y



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		laboratory test results and etc.)					
Employee	Medical health data	Personal health data, information about the used medical devices, prosthesis and etc.	21. Carrying out of Occupational Health& Safety Activities	Other (İBYS software company authorized by the Ministry of Family, Labour and Social Services)	No	15 years beginning from the date of leaving work	Y
Employee	Medical health data	Personal health data, information about the used medical devices, prosthesis and etc.	21. Carrying out of Occupational Health& Safety Activities	Other (İBYS software company authorized by the Ministry of Family, Labour and Social Services)	No	15 years beginning from the date of leaving work	Y
Employee	Medical health data	Medical drug records, vaccination data, health observance details	21. Carrying out of Occupational Health& Safety Activities	Other (İBYS software company authorized by the Ministry of Family, Labour and Social Services)	No	15 years beginning from the date of leaving work	Y
Employee	Identity details	Name, surname, Turkish Identity Number	21. Carrying out of Occupational Health& Safety Activities	Other (İBYS software company authorized by the Ministry of Family, Labour and Social Services)	No	15 years beginning from the date of leaving work	Y
Employee	Medical health data	Medical drug records	21. Carrying out of Occupational Health& Safety Activities	Other (İBYS software company authorized by the	No	15 years beginning from	Y

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				Pharmacy and Ministry of Family, Labour and Social Services)		the date of leaving work	
Employee	Medical health data	Pregnancy status, Personal health data	21. Carrying out of Occupational Health& Safety Activities	No	No	15 years beginning from the date of leaving work	N
Employee	Medical health data	Disability status, details of medical examinations	21. Carrying out of Occupational Health& Safety Activities	No	No	15 years beginning from the date of leaving work	N
Employee	Audio& Visual records	Back-up records of computers	23. Ensuring the business continuity and carrying out of the business activities, 1. Conducting of emergency case processes, 2. Carrying out of Information Security Processes	No	No	1 year beginning from the date of leaving work	N
Employee	Identity details	Name, surname, Turkish Identity Number	23. Ensuring the business continuity and carrying out of the business activities, 20. Conducting/ Supervision of the business activities	Suppliers (company from which the e-signature services are received)	No	1 year	Y
Employee	Contact details	Telephone numbers, e-mails	23. Ensuring the business continuity and carrying out of the business activities, 20. Conducting/ Supervision of the business activities	Suppliers (company from which the e-signature services are received)	No	1 year	Y
Employee	Transaction Security	IP address, Mac address	2. Carrying out of Information Security Processes 10. Carrying out of Access Authorizations 11. Conducting of the activities in compliance with the applicable legislations	No	No	2 years	N
Employee	Transaction Security	Usernames and passwords	2. Carrying out of Information Security Processes 10. Carrying out of Access Authorizations	No	No	1 Day beginning from	N

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			6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 20. Conducting/ Supervision of the business activities			the date of leaving work	
Employee	Finance	IBAN no details	12. Carrying out of the finance and accounting operations	Other	No	10 years beginning from the date of leaving work	Y
Employee	Identity details	Name, surname, date of birth	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 20. Conducting/ Supervision of the business activities	9. Other [Personnel of external auditing companies]	Yes	10 years beginning from the date of leaving work	Y
Employee	Professional Experience details	Diplomas, received courses, on-the-job trainings, certificates	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 20. Conducting/ Supervision of the business activities	9. Other [Personnel of external auditing companies]	Yes	10 years beginning from the date of leaving work	Y
Employee	Audio& Visual records	Photograph of person	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 20. Conducting/ Supervision of the business activities	9. Other [Personnel of external auditing companies]	Yes	10 years beginning from the date of leaving work	Y
Candidate Employee	Identity details	Name, surname, Turkish Identity Number	3. Carrying out of the Selection and Placement Processes for the Candidate Employees/ Interns/ Students, 4. Management of the Application Processes of the Candidate Employees, 19. Planning of human resources processes	No	No	2 years	N
Candidate Employee	Contact details	Address, telephone numbers, electronic mail address	3. Carrying out of the Selection and Placement Processes for the Candidate Employees/ Interns/ Students, 4. Management of the Application Processes of the Candidate Employees, 19. Planning of human resources processes	No	No	2 years	N



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Candidate Employee	Professional Experience details	Educational background, current and previous work experiences	3. Carrying out of the Selection and Placement Processes for the Candidate Employees/ Interns/ Students, 4. Management of the Application Processes of the Candidate Employees, 19. Planning of human resources processes	No	No	2 years	N
Supplier's Employees & Supplier's Officials	Identity details	Name, surname, Turkish Identity Number, date of birth	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 15. Carrying out of the task assignment processes 20. Conducting/ Supervision of the business activities 38. Carrying out of the Contract Processes	8. Competent public institutions and organizations (Ministries, Türkak) 4. Business Partners 9. Other (Customers)	Yes	Date of ending of business relationship + 10 Years	Y
Supplier's Employees & Supplier's Officials	Contact details	E-mail address, contact address, telephone numbers	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 18. Carrying out of the communication activities 20. Conducting/ Supervision of the business activities 38. Carrying out of the Contract Processes	8. Competent public institutions and organizations 4. Business Partners 9. Other (Customers)	Yes	Date of ending of business relationship + 10 Years	Y
Supplier's Employees & Supplier's Officials	Personal File	CV, SSI (Social Security Institution) Service breakdowns	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 15. Carrying out of the task assignment processes 20. Conducting/ Supervision of the business activities	8. Competent public institutions and organizations 4. Business Partners 9. Other (Customers)	Yes	Date of ending of business relationship + 10 Years	Y
Supplier's Employees & Supplier's Officials	Professional Experience details	Diplomas, received courses, on-the-job trainings, certificates	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 15. Carrying out of the task assignment processes 20. Conducting/ Supervision of the business activities	8. Competent public institutions and organizations 4. Business Partners	Yes	Date of ending of business relationship + 10 Years	Y

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				9. Other (Customers)			
Supplier's Employees & Supplier's Officials	Audio& Visual records	Photograph of person	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 20. Conducting/ Supervision of the business activities	No	No	Date of ending of business relationship + 10 Years	N
Supplier's Employees & Supplier's Officials	Professional Experience details	Diplomas, received courses, on-the-job trainings, certificates	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 20. Conducting/ Supervision of the business activities 38. Carrying out of the Contract Processes	9. Other [Personnel of external auditing companies]	No	Date of ending of business relationship + 10 Years	Y
Supplier's Employees & Supplier's Officials	Medical health data	Summary medical health report (It is requested from the companies in a manner not to include the personal data, however the companies send us detailed reports.)	21. Carrying out of Occupational Health& Safety Activities	No	No	Date of ending of business relationship + 10 Years	N
Supplier's Employees & Supplier's Officials	Criminal convictions and security measures	Criminal Background Check	21. Carrying out of Occupational Health& Safety Activities	No	No	Date of ending of business relationship + 10 Years	N
Employee, Candidate Employee, Person subject to the news, Shareholder/Partner, Potential Buyers of	Audio& Visual records	Photographs and videos of person	Carrying out of the communication activities Organization and Event Management Carrying out of the Advertisement/ Campaign/ Promotion Processes Carrying out of the Social Responsibility and Civil Society Activities Carrying out of the Sponsorship Activities	Open to public (Open to public opinion over the news sites and social media accounts of our Company)	Yes	50 years	Y



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products or services, Interns, Supplier's Employees & Supplier's Officials, Persons who purchased Products or Services			Carrying out of the Skill / Career Development Activities				
Other (Dependents, spouse and children of the employees)	Identity details	Name, surname	1. Conducting of emergency case processes 5. Conducting of employee satisfaction and loyalty processes 6. Fulfilment of obligations for the employees originating from the Employment Contract and Legislations 7. Conducting of processes for the employees regarding their Fringe Benefits and Rights 19. Planning of human resources processes 21. Carrying out of Occupational Health& Safety Activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	10 years beginning from the date of leaving work	N
Other (Members outside of the company who are assigned in the Commissions/ Committees)	Identity details	Name, surname	15. Carrying out of the task assignment processes 18. Carrying out of the communication activities 20. Conducting/ Supervision of the business activities	No	No	10 years	N
Other (Members outside of the company who are assigned in the Commissions/ Committees)	Contact details	E-mail address, contact address, telephone & fax numbers	15. Carrying out of the task assignment processes 18. Carrying out of the communication activities 20. Conducting/ Supervision of the business activities	No	No	10 years	N



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Other (details of persons responsible from projects at the partner companies)	Identity details	Name, surname	18. Carrying out of the communication activities Other. Project Applications	8. Competent public institutions and organizations (TÜBİTAK)	Yes	10 years	N
Other (details of persons responsible from projects at the partner companies)	Contact details	E-mail address, contact address, telephone & fax numbers	18. Carrying out of the communication activities Other. Project Applications	8. Competent public institutions and organizations (TÜBİTAK)	Yes	10 years	N
Other (Member of Board of Directors)	Identity details	Photocopy of national ID card, name, surname, Turkish Identity Number	7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 11. Conducting of the activities in compliance with the applicable legislations, 18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 44. Carrying out of the remuneration policy, 50. Informing the Authorized and Competent Persons, Institutions and Organizations, 51. Carrying out of the management activities	Competent public institutions and organizations	No	10 years	N
Other (Member of Board of Directors)	Contact details	Address, telephone numbers, electronic mail address	7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 11. Conducting of the activities in compliance with the applicable legislations, 18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 44. Carrying out of the remuneration policy, 50. Informing the Authorized and Competent Persons, Institutions and Organizations, 51. Carrying out of the management activities	Competent public institutions and organizations	No	10 years	N
Other (Member of Board of Directors)	Personal File	Payroll slip information, disciplinary interrogations,	7. Conducting of processes for the employees regarding their Fringe Benefits and Rights, 11. Conducting of the activities in compliance with the applicable legislations,	Competent public institutions and organizations	No	10 years	N

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		records of entry-exit certificate of employment, declaration of assets data, CV details, performance evaluation reports and etc.	18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 44. Carrying out of the remuneration policy, 50. Informing the Authorized and Competent Persons, Institutions and Organizations, 51. Carrying out of the management activities				
Other (Members outside of the company who are assigned in the Committees)	Identity details	Name, surname, Turkish Identity Number	8. Conducting of the Auditing/ Ethical activities 11. Conducting of the activities in compliance with the applicable legislations, 20. Conducting/ Supervision of the business activities	No	No	5 years	N
Other (Members outside of the company who are assigned in the Committees)	Contact details	Address no, e-mail address, contact address, recorded electronic mail address, telephone numbers	8. Conducting of the Auditing/ Ethical activities 11. Conducting of the activities in compliance with the applicable legislations, 20. Conducting/ Supervision of the business activities	No	No	5 years	N
Other (Members outside of the company who are assigned in the Committees)	Finance	IBAN no details	8. Conducting of the Auditing/ Ethical activities 11. Conducting of the activities in compliance with the applicable legislations, 20. Conducting/ Supervision of the business activities	No	No	5 years	N
Other (Members outside of the company who are assigned in the Committees)	Professional Experience details	Diplomas, received courses, on-the-job trainings, certificates, transcript information, national competency code, national competency level code	8. Conducting of the Auditing/ Ethical activities 11. Conducting of the activities in compliance with the applicable legislations, 20. Conducting/ Supervision of the business activities	No	No	5 years	N

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Other (Details of Parents of the Candidate Scholarship Student)	Personal File	Payroll slip information	11. Conducting of the activities in compliance with the applicable legislations, 18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 50. Informing the Authorized and Competent Persons, Institutions and Organizations, 51. Carrying out of the management activities	Competent public institutions and organizations, Natural persons or private law legal entities (Universities)	No	10 years	Y
Other (Scholarship Student)	Finance	IBAN no details	11. Conducting of the activities in compliance with the applicable legislations, 18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	10 years	N
Other (Details of Parents of the Scholarship Student/ Candidate Scholarship Student)	Identity details	Photocopy of national ID card, name, surname, Turkish Identity Number	11. Conducting of the activities in compliance with the applicable legislations, 18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 50. Informing the Authorized and Competent Persons, Institutions and Organizations,	Competent public institutions and organizations, Natural persons or private law legal entities (Universities)	No	10 years	Y
Other (Details of Parents of the Scholarship Student/ Candidate Scholarship Student)	Contact details	Address, telephone numbers, electronic mail address	11. Conducting of the activities in compliance with the applicable legislations, 18. Carrying out of the communication activities, 23. Ensuring the business continuity and carrying out of the business activities, 50. Informing the Authorized and Competent Persons, Institutions and Organizations	No	No	10 years	N
Recruitment Exam Candidate	Identity details	Name, surname, Turkish Identity Number, date of birth	29. Conducting of the Production and Operation Processes for the Goods / Services	8. Competent public institutions	No	Certificate Validity Expiry Date+ 5 Years	Y

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				and organizations (MYK) 9. Other (VIDCO Software)			
Recruitment Exam Candidate	Contact details	E-mail address, contact address, telephone numbers	29. Conducting of the Production and Operation Processes for the Goods / Services	8. Competent public institutions and organizations (MYK) 9. Other (VIDCO Software)	No	Certificate Validity Expiry Date+ 5 Years	Y
Recruitment Exam Candidate	Medical health data	Physical disability status	29. Conducting of the Production and Operation Processes for the Goods / Services	8. Competent public institutions and organizations (MYK) 9. Other (VIDCO Software)	No	Certificate Validity Expiry Date+ 5 Years	Y
Recruitment Exam Candidate	Audio& Visual records	Video records	29. Conducting of the Production and Operation Processes for the Goods / Services	8. Competent public institutions and organizations (MYK) 9. Other (VIDCO Software)	No	Certificate Validity Expiry Date+ 5 Years	Y
Recruitment Exam Candidate	Finance	IBAN no details	29. Conducting of the Production and Operation Processes for the Goods / Services	8. Competent public institutions and organizations (MYK) 9. Other (VIDCO Software)	No	Certificate Validity Expiry Date+ 5 Years	Y
Intern	Identity details	Photocopy of national ID card, name, surname, Turkish Identity Number	3. Carrying out of the Selection and Placement Processes for the Candidate Employees/ Interns/ Students, 4. Management of the Application Processes of the Candidate Employees, 19. Planning of human resources processes	Education institution	No	10 years beginning from the date of leaving work	N

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Intern	Contact details	Address, telephone numbers, electronic mail address	3. Carrying out of the Selection and Placement Processes for the Candidate Employees/ Interns/ Students, 4. Management of the Application Processes of the Candidate Employees, 19. Planning of human resources processes	Education institution	No	10 years beginning from the date of leaving work	N
Persons who purchased Products or Services	Finance	IBAN no details	12. Carrying out of the finance and accounting operations	Competent public institutions and organizations (GİB) and customers	No	10 years beginning from the starting of the new year following the calendar year of processing	Y
Persons who purchased Products or Services	Contact details	E-mail address, contact address, telephone numbers	12. Carrying out of the finance and accounting operations, 18. Carrying out of the communication activities, 27. Carrying out of the Sales Processes for the Goods / Services, 29. Carrying out of the Customer Relations Management Processes, 38. Carrying out of the Contract Processes	No	No	25 years	N
Persons who purchased Products or Services	Identity details	Name, surname, Turkish Identity Number	12. Carrying out of the finance and accounting operations, 18. Carrying out of the communication activities, 27. Carrying out of the Sales Processes for the Goods / Services, 29. Carrying out of the Customer Relations Management Processes, 38. Carrying out of the Contract Processes	No	No	25 years	N
Persons who purchased Products or Services	Professional Experience details	Diplomas, received courses, on-the-job trainings, certificates	29. Conducting of the Production and Operation Processes for the Goods / Services	No	No	10 years	N

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Persons who purchased Products or Services; Potential Buyers of products or services	Criminal convictions and security measures	Criminal Background Check	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 37. Conducting of the data keeping and archive activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Competent public institutions and organizations (Public Implementation Center- UAB TMKTDGM)	No	All of the information and documentations belonging to the course attendees are kept for 3 years of period, pursuant to Article 10c) of the TMGD Communiqué	N
Persons who purchased Products or Services; Potential Buyers of products or services	Audio& Visual records	Ordinary head-shot photographs of persons	9. Carrying out of the training activities 11. Conducting of the activities in compliance with the applicable legislations 37. Conducting of the data keeping and archive activities 50. Informing the Authorized and Competent Persons, Institutions and Organizations	Competent public institutions and organizations (Public Implementation Center- UAB TMKTDGM)	No	All of the information and documentations belonging to the course attendees are kept for 3 years of period, pursuant to Article 10c) of the TMGD Communiqué	N
Visitor	Identity details	Name, surname, Turkish Identity Number	14. Ensuring of security of the physical locations	No	No	10 years	N
Visitor	Physical location security	Information about entry-exit details of the persons	14. Ensuring of security of the physical locations	No	No	10 years	N



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PROCEDURE ON IMPLEMENTATION POLICY FOR PROTECTION, KEEPING AND DESTRUCTION OF PERSONAL DATA

Visitor	Physical location security	Surveillance camera records	14. Ensuring of security of the physical locations	No	No	60 Days	N
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