CENTRA UZMAN HUMAN RESOURCES AND TECHNOLOGY INDUSTRY AND TRACE INC. THE POLICY REGARDING THE RETENTION, PROTECTION AND DESTRUCTION OF PERSONAL DATA

ISSUED UNDER THE LAW NUMBERED 6698 AND RELEVANT REGULATIONS

SCOPE

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1- Legal and Technical Terms

Law/LPPD **:** The Law on the Protection of Personal Data **numbered 6698**

Regulation **:** Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28 October 2017

Board : Personal Data Protection Board.

Personal Data : All types of information relating to an identified or identifiable natural person.

Sensitive Data : Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data.

Data Subject Related Person **:** Natural person whose personal data is processed

Recording Medium : All types of medium in which personal data that is processed, in whole or in part, through automatic or non-automatic means provided that it is a part of any data registry system, is kept.

Explicit Consent **:** Consent provided by freewill in relation to a specific subject, based on being informed.

Processing of Personal Data : Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.

Relevant User **:** The persons who process personal data within the organisation of the data controller or in accordance with the instruction and authority obtained from the data controller, except those who is responsible to retain, protect and back-up the data technically.

Data Controller : The natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system.

Destruction : Deletion, destruction or anonymization of personal data.

Processing of Personal Data : Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.

Anonymization of

Personal Data : Making personal data impossible to associate with an identified or identifiable natural person by any means, even if such data is matched with other data.

Deletion of Personal Data : Deletion of personal data; making personal data impossible for the Relevant Users to access and reuse personal data.

Destruction of Personal Data : Making personal data impossible to be accessed, retrieved or reused by any person or by any means.

Periodical Destruction : Deleting, destructing or anonymizing -*ex officio*- personal data in accordance with the terms stated in the personal data retention and destruction policy periodically in case all conditions leading to process personal data stated in the Law no longer exist.

2- Our purpose on issuing the policy of the retention and destruction of data

This policy aims to determine our obligations under the Regulation issued in accordance with Article 7/3 of the LPPD, to establish the principles and conditions which we need to observe when performing our obligations, to set forth our purposes to retain your personal data, to indicate the periods in which we process and destroy your personal data, and to inform you (members and visitors of the site, sanaluzman.com) and our business partners authorized by us about the terms of retention, processing and protection of your personal data.

3- Why We Retain and Destruct Your Personal Data

We process your personal data in accordance with the conditions set forth by the Law and Regulation in order to reach the commercial existence and purposes of our website, namely sanaluzman.com, as well as to provide you the best service and offer the utmost benefit, to make the services comply with your requests, to fix the errors in sanaluzman.com, to maximize the service quality by getting in contact with you.

We destroy your personal data when: the conditions under articles 5 and 6 of the Law arise; the personal data retained becomes in contradict to the laws and regulations; we receive the request of the data subject regarding the deletion of his/her personal data; or the Board decides that the personal data shall be deleted.

4- Which precautions do we take when we retain, process and to prevent access to your data? Under which procedures and medium do we retain your data?

We process your data in accordance with the following principles and those stated in article 4 of the Law:

- Lawfulness and conformity with rules of bona fides
- Accuracy and being up to date, where necessary
- Being processed for specific, explicit and legitimate purposes
- Being relevant with, limited to and proportionate to the purposes for which they are processed
- Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed

Our Obligations Concerning Data Security:

- Data Controller must take all necessary technical and administrative precautions to provide a sufficient level of security in order to;

a) prevent unlawful processing of personal data,
b) prevent unlawful access to personal data,
c) ensure the retention of personal data.

- In case the personal data is processed by a natural or legal person on behalf of the controller, the data controller shall jointly be responsible with these persons for taking the precautions set forth in the first paragraph.

- The data controller must conduct necessary inspections, or have them conducted in his own institution or organization, in order to ensure the implementation of the provisions of the Law.

- The data controllers and processors shall not disclose the personal data that they learned to anyone in breach of this Law, and they may not use such data for purposes other than processing. This obligation shall survive upon termination of their employment.

- In case the processed data are collected by other parties through unlawful methods, the data controller shall notify the data subject and the Board within the shortest time. Where necessary, the Board may announce such breach at its official website or through other methods it deems appropriate.

In accordance with the Law and the Regulation, your data:

INFORMATION ON RETENTION MEDIUMS

- Database Server (SQL Server)
- File server

WE TAKE THE FOLLOWING PRECAUTIONS TO PREVENT ACCESS TO DATA BY UNAUTHORIZED PERSONS

- We conduct internal audit by the systems established.
- We carry out the processes of risk assessments for information technologies and business impact analyses by the systems established.
- We provide the technical infrastructure to prevent or monitor the leakage of data outside the institution and create relevant matrixes.
- We ensure control over the system weaknesses by providing leakage testing services periodically and when needed.
- We provide control over the authority of access of the personnel working at the information technologies departments to personal data.
- We irreversibly destroy personal data and without leaving any audit trace.
- We protect all types of digital media in which personal data are stored or by encoded or cryptographic methods under article 12 of the Law, in a way to meet information security requirements.

5- The departments, titles and job definitions of our workmates who participate in the retention and destruction processes as well as the duties they assumed within the scope of this policy

TITLE OF THE PERSONNEL ASSIGNED TO RETENTION DEPARTMENT	WORKING UNIT	DEFINITION OF DUTY
Team Leader	Information Technologies and Software Department – Responsible for implementing the personal data retention and destruction policy	Ensuring the processes that are within his/her duty to comply with the retention period, and managing personal data destruction process as per the periodical destruction period.
Software Specialist	Information Technologies and Software Department – Responsible for implementing the personal data retention and destruction policy	Ensuring the processes that are within his/her duty to comply with the retention period, and managing personal data destruction process as per the periodical destruction period.

6- PERIODS FOR RETENTION AND DESTRUCTION OF DATA

RETAINED DATA TYPE	RETENTION PERIOD	DESTRUCTION PERIOD
User Profile Information (Contact, Education, Experience, Profile Photo)	10 years following the end of membership relation.	30 days following the request of data subject to destroy.
Retention of Contract of Work	10 years following the end of membership relation.	30 days following the end of retention process.

Log, Login Tracking Systems	3 years following the end of membership relation	30 days following the end of retention process.
Work, Offer and Delivery Documents	10 years following the end of membership relation of all of the users that affected the work (employer, employee).	30 days following the end of retention process.
Payment Transactions	10 years following the end of membership relation.	30 days following the end of retention process.
Employees' Personnel Files	10 years following the end of employment relation.	30 days following the end of retention process.