



PERSONAL DATA RETENTION AND DESTRUCTION POLICY

I. PURPOSE

The Personal Data Retention and Destruction Policy ("Policy") has been prepared by Quad Plus Automation Services Ltd. Co. ("Company") in order to determine the procedures and principles regarding retention and destruction activities carried out by the Company, and to regulate the procedures and principles regarding the retention and destruction of personal and special category personal data recorded in electronic and physical data recording systems operated by the Company.

The Company, in accordance with the Law No. 6698 on the Protection of Personal Data ("Law"), prioritizes the processing of personal data belonging to Company employees, employee candidates, visitors, suppliers, and customers in compliance with the Constitution of the Republic of Türkiye, international conventions, the Law, and other relevant legislation, and ensuring that data subjects can effectively exercise their rights.

The procedures and principles regarding the retention and destruction of personal data are carried out in accordance with the Regulation prepared by the Company in this regard.

II. SCOPE

This Regulation covers personal data belonging to:

- Company employees
- Former employees
- Interns
- Employee candidates
- Visitors
- Suppliers
- Customers



and applies to all recording environments and personal data processing activities where personal data owned or managed by the Company are processed.

As a fundamental principle, the Company ensures that personal data belonging to Company customers, employees, employee candidates, service providers, visitors, and other third parties are processed in accordance with the Constitution of the Republic of Türkiye, international conventions, Law No. 6698 on the Protection of Personal Data ("Law"), and other relevant legislation.

Within this scope, preventing loss of rights and ensuring the effective exercise of rights of data subjects is prioritized.

This Policy has been prepared in compliance with:

- Law No. 6698
- Regulation on the Deletion, Destruction or Anonymization of Personal Data (Official Gazette dated 28.10.2017, No. 30224)
- Other relevant legislative provisions

III. RESPONSIBILITY

- The Company is responsible for the implementation of this procedure.
- The Company Personal Data Management Committee is responsible for overseeing its execution.

IV. DEFINITIONS

For the purposes of this Policy:

Recipient Group: The category of real or legal persons to whom personal data are transferred by the data controller

Explicit Consent: Consent given freely, based on information, and related to a specific subject

Anonymization: Rendering personal data impossible to associate with an identified or identifiable real person



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Employee: Quad Plus Automation Services employees

Electronic Environment: Environments where personal data can be created, read, modified, and written using electronic devices

Non-Electronic Environment: All written, printed, visual, and other environments outside electronic environments

Service Provider: A real or legal person providing services within a specific contractual framework

Data Subject: The real person whose personal data are processed

Authorized User: Persons processing personal data within the data controller organization, excluding technical storage personnel

Destruction: Deletion, destruction, or anonymization of personal data

Law: Law No. 6698 on the Protection of Personal Data

Recording Environment: Any environment where personal data processed fully or partially automatically or non-automatically are located

Personal Data: Any information relating to an identified or identifiable real person

Personal Data Processing Inventory: Inventory detailing data processing activities, purposes, categories, recipient groups, retention periods, transfers abroad, and security measures

Processing of Personal Data: Any operation performed on personal data

Special Category Personal Data: Data relating to race, ethnic origin, political opinion, religion, health, criminal convictions, biometric and genetic data

Periodic Destruction: Deletion, destruction, or anonymization carried out at recurring intervals

Deletion: Rendering personal data inaccessible and unusable

Regulation: Regulation on the Deletion, Destruction or Anonymization of Personal Data

Data Processor: A person processing personal data on behalf of the data controller

Data Recording System: A system where personal data are structured according to specific criteria



Data Controller: The entity determining purposes and means of processing personal data

VERBIS: Data Controllers Registry Information System

V. PRINCIPLES OF IMPLEMENTATION

1. Assignment of Duties and Responsibilities

Pursuant to Article 6(f) of the Regulation, titles, duties, and units of persons involved in personal data retention and destruction processes have been defined.

Company Management: Ensures employees act in compliance with the Policy.

Personal Data Management Committee:

- Directs planning, analysis, and risk identification
- Manages compliance processes
- Determines location of personal data
- Decides on data subject requests

Legal Department and IT Department:

- Examine data subject requests
- Report to Committee
- Implement Committee decisions
- Audit retention and destruction processes

Human Resources and QMS Department:

- Implement policies
- Conduct audits

Employees:

- Act in compliance with the Regulation
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VI. RECORDING ENVIRONMENTS

A. Digital Environments

- Servers (e-mail, database, web, backup)
- Software (office software, IFS, VERBIS)



- Information security devices
- Personal computers
- Mobile devices
- Optical disks
- Removable storage
- Printers, scanners, fax
- Social media accounts

Facebook – <https://www.facebook.com/quadplusotomasyon>

Instagram – <https://www.instagram.com/quadplusotomasyon>

LinkedIn – <https://www.linkedin.com/company/quadplusotomasyon>

YouTube – <https://www.youtube.com/channel/UCQO2xN7FM7fSmhP2NGAcVCw>

B. Non-Digital Environments

- Paper
 - Manual data recording systems
 - Written, printed, and visual media
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VII. LEGAL GROUNDS REQUIRING STORAGE

Personal data are stored pursuant to:

- Law No. 6698
 - Labor Law No. 4857
 - Turkish Code of Obligations No. 6098
 - Social Insurance Law No. 5510
 - Law No. 5651
 - Occupational Health and Safety Law No. 6331
 - Right to Information Act No. 4982
 - Law No. 3071
 - Other relevant secondary legislation
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VIII. PURPOSES REQUIRING STORAGE

Personal data are stored for purposes including but not limited to:

- Emergency Management
 - Information Security
 - Recruitment Processes
 - Employee Benefits
 - Legal Compliance
 - Finance and Accounting
 - Physical Security
 - HR Planning
 - Customer Relationship Management
 - Risk Management
 - Contract Processes
 - Performance Evaluation
 - Visitor Records
 - Strategic Planning
 - Supply Chain Management
 - Management Activities
 - Providing Information to Authorized Authorities
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IX. REASONS REQUIRING DESTRUCTION

Personal data are deleted, destroyed, or anonymized when:

- Retention periods expire
 - Legal basis is repealed
 - Processing purpose ceases
 - Explicit consent is withdrawn
 - Data subject request is accepted
 - Authority decision requires destruction
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X. TECHNICAL AND ADMINISTRATIVE MEASURES

A. Technical Measures

- Access control matrices
- Physical IT security
- Firewall and intrusion systems
- Patch management
- Strong passwords
- Secure backup systems
- Special category data training and confidentiality
- Secured physical environments

B. Administrative Measures

- Personal data inventory
- Confidentiality agreements
- Informing data subjects
- Internal audits
- Risk analyses
- Information security training

XI. PERSONAL DATA DESTRUCTION TECHNIQUES

A. Deletion Methods

Servers: Access revoked and deletion performed

Digital Environments: Data rendered inaccessible

Physical Environments: Blackening, erasing, masking

B. Destruction Methods

Physical Media: Shredding

Digital Media:

- Physical destruction
- De-magnetization
- Overwriting at least seven times
- Permanent revocation of access



Cloud Environments: Secure digital deletion and destruction of encryption keys

C. Anonymization Methods

Physical Media:

- Variable removal
- Masking
- Generalization
- Micro-aggregation
- Data scrambling

Digital Environments:

- Encryption
- Symbolization
- Blurring
- Mixing
- Invalidation

XII. RETENTION AND DESTRUCTION PERIODS

Retention periods are defined in the Personal Data Inventory.

| Process | Retention Period | Destruction Period |
|---------------------------------|----------------------------|--------------------|
| Labor Law records | 10 years after termination | Within 180 days |
| Health reports | 15 years after termination | Within 180 days |
| SGK records | 10 years after termination | Within 180 days |
| Occupational accident documents | 10 years after termination | Within 180 days |



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|---------------------------|-------------------------|-----------------|
| Other legislation data | As stipulated | Within 180 days |
| Criminal proceedings data | Statute of limitations | Within 180 days |
| Customer data | 10 years from recording | Within 180 days |

XIII. PERIODIC DESTRUCTION PERIOD

Pursuant to Article 11 of the Regulation, periodic destruction is carried out every 6 months (June and December).

XIV. PUBLICATION AND STORAGE OF THE POLICY

The Policy is published in both printed and electronic formats and stored digitally and physically in personnel files after being signed by employees.

XV. UPDATE PERIOD

The Policy is reviewed as needed and updated when required.

XVI. ENTRY INTO FORCE

The Policy enters into force upon publication via the Company's mailing group and posting on announcement boards.