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1. INTRODUCTION

1.1. Purpose

As Alfer Engineering Construction Trade and Industry Inc. (ALFER), we pay attention to the storage and, when necessary, the destruction of personal data of individuals, including employees, job candidates, employee relatives, interns, supplier representatives, supplier employees, shareholders/partners, product or service recipients, potential product or service recipients, and visitors, in compliance with the Turkish Constitution, Law No. 6698 on the Protection of Personal Data ("KVKK"), and the Personal Data Deletion, Destruction, or Anonymization Regulation published in the Official Gazette dated 28.10.2017 and numbered 30224 ("Regulation"), as well as other relevant legislation.

Therefore, as the data controller, we determine the maximum retention periods necessary for the purposes for which all personal data obtained during our business processes are processed, and we carry out their destruction in accordance with this Personal Data Retention and Destruction Policy ("Policy").

Furthermore, during the storage and destruction of personal data, we take all necessary technical and administrative measures to prevent the unlawful storage and destruction of this data. At Alfer, we attach importance to protecting the privacy of personal data during the storage and destruction processes and prioritize data security at the highest level.

This Policy contains explanations about the methods we follow regarding the storage and destruction of personal data obtained during our activities.

1.2. Scope

This Policy covers all personal data processed by Alfer regarding individuals, including employees, job candidates, employee relatives, interns, supplier representatives, supplier employees, shareholders/partners, product or service recipients, potential product or service recipients, and visitors.

The Policy relates to the storage and destruction of these personal data by Alfer in all electronic and printed media and has been prepared in accordance with the KVKK, other legislation on personal data, and international regulations and guiding documents in this field.

1.3. Abbreviations and Definitions

| The Concept | Definition |
|-------------------------------|--|
| Electronic environment | Environments where personal data can be created, read, modified, and written using electronic devices. |
| Destruction | The process of erasing, destroying, or anonymizing personal data. Data subject The individual whose personal data is being processed. |

| | |
|---------------------------------------|--|
| Related user | The person processing personal data, except for the person or unit responsible for the technical storage, protection, and backup of data, within the data controller organization or under the authorization and instructions received from the data controller. |
| KVKK | Law No. 6698 on the Protection of Personal Data. |
| Personal data | Any kind of information related to an identified or identifiable natural person. |
| Board | The Personal Data Protection Board. |
| Policy | The policy used as a basis by data controllers to determine the maximum retention period required for the purposes of processing personal data and for the processes of deletion, destruction, and anonymization. |
| Anonymization of personal data | Making personal data unrelated to an identified or identifiable natural person, even if matched with other data. |
| Deletion of personal data | Rendering personal data completely or partially inaccessible and unusable by any means by the relevant users. |
| Destruction of personal data | Rendering personal data inaccessible, irretrievable, and permanently unusable by anyone. |
| Periodic destruction | Residual deletion, destruction, or anonymization of personal data carried out at regular intervals as specified in the personal data retention and destruction policy when all processing conditions of personal data stated in KVKK cease to exist. |
| Data processor | Natural or legal person who processes personal data on behalf of the data controller based on the authorization given by the data controller. |
| Data Controller | The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system. |
| Regulation | The Regulation on the Deletion, Destruction, or Anonymization of Personal Data, which was published in the Official Gazette dated 28.10.2017 and numbered 30224 and entered into force. |

2. RESPONSIBILITIES AND TASK DISTRIBUTIONS

The titles, departments, and responsibilities of those involved in the storage and destruction processes of personal data are provided below:

| Responsible | Title Responsibilities |
|---|--|
| Human Resources Assistant Manager | Responsible for the preparation, development, updating, periodic review, and publication of this policy. |
| Finance and Administrative General Manager Assistant | Responsible for the control and approval of this policy. |
| All Units and Unit Employees within the Company | Responsible for compliance with this policy and providing necessary support in the preparation, development, and all activities related to the storage and destruction processes of personal data. |

3. RECORD ENVIRONMENTS

At Alfer, we use the following record environments to store the personal data we obtain during our activities in compliance with the legal periods:

| Electronic Environments | Non-Electronic Environments |
|--|--|
| <ul style="list-style-type: none"> ● Emails ● Removable storage devices such as USB drives, hard disks ● Company Server (File Server) ● Logo Payroll Module (ERP) ● Perkotek (Time and Attendance Program) | <ul style="list-style-type: none"> ● Folders ● Files ● Locked Cabinets |

4.STORAGE AND DESTRUCTION EXPLANATIONS

At Alfer, the personal data of individuals, including employees, job candidates, employee relatives, interns, supplier representatives, supplier employees, shareholders/partners, product or service recipients, potential product or service recipients, and visitors, are stored and destroyed in accordance with the KVKK.

Detailed explanations regarding storage and destruction are provided below.

4.1. Explanations on Storage

Various regulations in the legislation require the mandatory retention of personal data for specific periods. Therefore, we keep the processed personal data for the duration prescribed in the relevant legislation or, if no specific period is specified, for the time necessary for the purposes of processing the personal data.

In cases where we process personal data for multiple purposes, the data will be deleted, destroyed, or anonymized ex officio when all processing purposes are fulfilled, there is no legal obstacle to deleting the data, and the data subject requests such action.

4.1.1. Legal Grounds Requiring Storage

At Alfer, the personal data processed within the scope of our activities is retained for the duration specified in the relevant legislation. In this regard, personal data is stored in accordance with the retention periods set forth in various laws and regulations, including:

- Law No. 6698 on the Protection of Personal Data
- Turkish Code of Obligations No. 6098
- Turkish Commercial Code No. 6102
- Turkish Penal Code No. 5237
- Labor Law No. 4857
- Former Labor Law No. 1475
- Occupational Health and Safety Law No. 6331
- Tax Procedure Law No. 213
- Social Insurance and General Health Insurance Law No. 5510
- Law on Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications (Law No. 5651)
- Law on Identity Notification No. 1774

The personal data is retained for the duration specified in the above-mentioned laws and other secondary regulations currently in effect.

4.1.2. Processing Purposes Requiring Storage

Alfer stores the personal data processed within the scope of its activities for the following purposes:

- Execution of Candidate / Intern / Student Selection and Placement Processes
- Execution of Candidate Application Processes
- Execution of Employee Satisfaction and Engagement Processes
- Fulfillment of Employment Contracts and Legal Obligations for Employees
- Execution of Additional Benefits and Benefits Processes for Employees
- Conducting Audits / Ethical Activities
- Execution of Training Activities
- Ensuring Compliance of Activities with Legislation
- Execution of Finance and Accounting Operations
- Execution of Assignment Processes
- Execution of Communication Activities
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Execution of Performance Evaluation Processes
- Execution of Storage and Archiving Activities

- Execution of Contract Processes
- Execution of Wage Policy
- Work Permit and Residence Permit Procedures for Foreign Personnel
- Execution of Talent / Career Development Activities
- Providing Information to Authorized Persons, Institutions, and Organizations
- Execution of Management Activities
- Creation and Tracking of Visitor Records
- Execution of Emergency Management Processes
- Monitoring and Execution of Legal Affairs
- Ensuring Physical Space Security
- Execution of Product / Service Marketing Processes

4.2. Reasons Requiring Destruction

Personal data is deleted, destroyed, or anonymized by Alfer in the following cases:

- Changes or revocations of the relevant legislation that formed the basis for the processing.
- Cessation of the purpose that required the processing or storage of personal data.
- Withdrawal of explicit consent by the data subject in cases where processing of personal data is based solely on explicit consent.
- Acceptance by Alfer of the data subject's application for the deletion and destruction of personal data within the framework of the rights of the data subject under Article 11 of the KVKK.
- Submission of a complaint to the Board by the data subject in cases where Alfer rejects the application for deletion or destruction of personal data, deems the response insufficient, or fails to respond within the period prescribed in the KVKK, and the Board finds the complaint appropriate.
- Expiry of the maximum retention period requiring the storage of personal data and the absence of any condition justifying the storage of personal data for a longer period, upon the data subject's request, personal data is deleted, destroyed, or anonymized by Alfer or ex officio.

5.ADMINISTRATIVE AND TECHNICAL MEASURES

In accordance with Article 12 and the fourth paragraph of Article 6 of the KVKK, which sets out the requirements for the secure storage, prevention of unlawful processing, and unauthorized access to personal data, Alfer takes administrative and technical measures in line with sufficient precautions announced by the Board specifically for sensitive personal data.

5.1. Administrative Measures

Alfer implements the following measures concerning the personal data it processes:

- Conducts and monitors efforts to prevent the unlawful processing of personal data.
- Ensures the preservation of personal data, keeping documents stored in locked rooms.
- Implements disciplinary procedures for employees who do not comply with security policies and procedures.

- Meets the obligation to inform relevant individuals who have previously had their personal data processed, following inventories and other procedures.
- Fulfills the obligation to inform the data subjects by the organization before starting the processing of personal data.
- Includes disciplinary regulations with data security provisions for employees.

5.2. Technical Measures

Alfer implements the following technical measures concerning the personal data it processes:

Network security and application security are ensured.

An authorization matrix is created for employees.

Up-to-date anti-virus systems are used.

Firewalls are utilized.

Personal data is backed up, and the security of the backed-up data is ensured.

User account management and authorization control system are applied and monitored.

Intrusion detection and prevention systems are used.

Cybersecurity measures are taken and continuously monitored.

Encryption is implemented.

6.PERSONAL DATA DESTRUCTION TECHNIQUES

At the end of the retention period specified in the relevant legislation or the necessary storage period for the purpose of processing, personal data is destroyed by Alfer either ex officio or upon the application of the data subject, in accordance with the provisions of the relevant legislation, using the techniques listed below:

6.1. Erasure of Personal Data

To lawfully erase personal data, Alfer employs the following techniques:

| Data Recording Medium | Description |
|---|--|
| Physical Environment with Personal Data | Personal data stored in a physical environment is securely kept in a manner that prevents any access by relevant users and is then erased. |
| Personal Data in Databases | Access to personal data in databases is restricted by assigning roles and permissions to relevant users. |

| | |
|---|--|
| Personal Data in Central Servers | Access rights to the directory containing personal data files on central servers are revoked for relevant users. |
| Personal Data in Portable Devices (USB, Hard disk, CD, DVD, etc.)0p | Access to the files containing personal data on portable devices is blocked for relevant users. |

6.3. Anonymization of Personal Data

Anonymization of personal data refers to rendering the data in such a way that, even if combined with other data, it cannot be associated with any identified or identifiable individual. For personal data to be considered anonymized, appropriate technical methods within the recording medium and relevant operational area should be used to ensure that the data cannot be linked to any identified or identifiable individual, even through data retrieval by the data controller or third parties.

7.STORAGE AND DESTRUCTION PERIODS

The Human Resources department is responsible for performing the deletion, destruction, or anonymization of personal data that has reached the end of the storage period, without distinguishing between departments within the workplace.

The storage periods for personal data have been determined within the framework of the periods specified in the relevant legislation. In this context, the evaluation of the storage of relevant data within Alfer is carried out in compliance with the legal grounds provided for in Articles 5 and 6 of the KVKK concerning personal data and sensitive personal data. Based on these legal grounds, the storage periods for the relevant personal data are determined. The process of destruction for personal data is conducted by Alfer in accordance with the storage periods determined in accordance with the relevant legislation, tailored to each relationship. Personal data that has reached the end of its storage period is deleted, destroyed, or anonymized by Alfer in accordance with the periodic destruction intervals specified.

| Process | Storage Period | Destruction Period |
|--|--|---|
| Execution of Human Resources Employee Processes | 10 years from the date of the employee's departure | During the first periodic destruction following the end of the storage period |
| Execution of Candidate Processes | 1 year from the application date | During the first periodic destruction following the end of the storage period |
| Execution of Contractual Relations | 10 years following the termination of the contract | During the first periodic destruction following the end of the storage period |

| | | |
|---|--|--|
| Health Information (Sensitive Personal Data) | 15 years | During the first periodic destruction following the end of the storage period |
| Physical Location Security - Camera Recordings | 15 Days | Records for 15 days are automatically deleted at the end of the 15th day. |
| Accounting and Financial Information | 10 years from the employee's departure | During the first periodic destruction following the end of the storage period |
| Information Kept for Legal Proceedings | 10 years from the employee's departure | During the first periodic destruction following the end of the storage period. |

8.PERIODIC DESTRUCTION PERIOD

In accordance with Article 11 of the Regulation, the periodic destruction period is determined by Alfer as [6] months.

9.PUBLICATION AND RETENTION OF THE POLICY

This Policy is published on [www.alfer.com.tr] with the approval of the General Manager and communicated to relevant personnel via email and internal notice boards.

10.UPDATE PERIOD OF THE POLICY

The Policy is updated as per the needs of Alfer and changing processes within the framework of laws and regulations.

11.EFFECTIVENESS AND CANCELLATION OF THE POLICY

This Policy will come into effect on 01.01.2020 with the approval of the General Manager. The cancellation of the Policy will also be carried out with the approval of the General Manager. The canceled Policy will be retained. The cancellation will be communicated to relevant personnel through email and notice boards.