

UKTAŞ ULUSLARARASI KONGRE SARAYI TESİSLERİ İŞLETMECİLİĞİ TİCARET A.Ş.

PERSONAL DATA PROTECTION, PROCESSING, RETENTION AND DESTRUCTION POLICY

TABLE OF CONTENTS

1. Introduction
Purpose, Scope, Abbreviations and Definitions
2. Principles Adopted by the Company Regarding the Processing and Protection of Personal Data
3. Responsibilities and Distribution of Duties
4. Recording Media
5. Transfer of Personal Data
6. Explanations on Reasons Requiring Retention and Destruction
7. Rights of Personal Data Owners and Conclusion of Requests by the Company
8. Technical and Administrative Measures
9. Personal Data Destruction Techniques
10. Retention and Destruction Periods
11. Periodic Destruction Period
12. Publication and Retention of the Policy
13. Update Period of the Policy
14. Effectiveness and Repeal of the Policy

1. INTRODUCTION

Purpose

The purpose of this document, the Personal Data Retention and Destruction Policy ("Policy"), is to fulfill our obligations in accordance with the Law on the Protection of Personal Data No. 6698 ("KVKK" or "Law") and the Regulation on the Deletion, Destruction or Anonymization of Personal Data ("Regulation") which constitutes the secondary regulation of the Law and entered into force by being published in the

Official Gazette dated October 28, 2017. It has been prepared by Uktaş Uluslararası Kongre Sarayı Tesisleri İşl. Tic. A.Ş. (hereinafter referred to as "Uktaş" or "Company") as the data controller in order to determine the maximum retention period necessary for the purpose for which personal data are processed and to inform data owners about the deletion, destruction, and anonymization processes.

Scope

Personal data belonging to Company employees, employee candidates, service providers, visitors, and other third parties are within the scope of this Policy, and this Policy applies to all recording media owned or managed by the Company where personal data is processed and activities directed towards the processing of personal data.

Abbreviations and Definitions

Abbreviation / Term	Definition
EXPLICIT CONSENT	Consent related to a specific subject, based on information and expressed with free will.
GDPR	The European Union General Data Protection Regulation 2016/679, which repealed directive 95/46/EC on 25.05.2018.
RELEVANT USER	Persons who process personal data within the data controller's organization or in line with the authorization and instruction received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of data.
DESTRUCTION	Deletion, destruction, or anonymization of personal data.
LAW / KVKK	Law on Protection of Personal Data No. 6698.
RECORDING MEDIUM	Any medium where personal data is stored, processed wholly or partly by automatic means or by non-automatic means provided that it forms part of a data filing system.
PERSONAL DATA	Any information relating to an identified or identifiable natural person.
TRANSFER OF PERSONAL DATA	Sharing personal data with domestic or foreign institutions, organizations, suppliers, etc. in compliance with the KVKK and Article 5 of this Policy.
ANONYMIZATION OF PERSONAL DATA	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching with other data.

Abbreviation / Term	Definition
PROCESSING OF PERSONAL DATA	Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making available, classification, or preventing the use thereof, fully or partially automatically or by non-automatic means provided it forms part of a data filing system.
DELETION OF PERSONAL DATA	Deletion of personal data; rendering personal data inaccessible and unusable for relevant users in any way.
DESTRUCTION OF PERSONAL DATA	The process of making personal data completely inaccessible, irretrievable, and unusable by anyone.
BOARD	Personal Data Protection Board.
AUTHORITY	Personal Data Protection Authority.
AUTOMATIC DATA PROCESSING	Personal data processing activity carried out by interconnected and interacting electrical or electronic systems, minimizing the need for human intervention.
NON-AUTOMATIC DATA PROCESSING	Personal data processing activity carried out manually, via human intervention.
SPECIAL CATEGORY PERSONAL DATA	Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometrics and genetics.
PERIODIC DESTRUCTION	The process of deletion, destruction, and anonymization specified in the personal data retention and destruction policy and carried out ex officio at recurring intervals when all conditions for processing personal data in the Law are eliminated.
DATA SUBJECT / RELEVANT PERSON	The natural person whose personal data is processed.
DATA CONTROLLER	The natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data filing system.

Abbreviation / Term	Definition
REGULATION	Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.
POLICY	Personal Data Retention and Destruction Policy.
DATA PROCESSOR	The natural or legal person who processes personal data on behalf of the data controller upon its authorization.
VERBIS	Data Controllers' Registry Information System.

2. PRINCIPLES ADOPTED BY THE COMPANY REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA

(a) Compliance with Basic Personal Data Processing Principles

Within the scope of achieving and sustaining compliance with the personal data protection legislation, the following basic principles are adopted by the Company:

Processing personal data in accordance with the law and good faith: The Company conducts personal data processing activities in accordance with the law and good faith, primarily the Constitution of the Republic of Turkey and the personal data protection legislation.

Ensuring the accuracy and up-to-dateness of the processed personal data: While carrying out the personal data processing activities, the Company takes all necessary administrative and technical measures within technical possibilities to ensure the accuracy and up-to-dateness of personal data.

Processing personal data for specific, explicit, and legitimate purposes: The Company conducts personal data processing activities within the specific, explicit, and lawful purposes determined before the start of the personal data processing activity.

Processing personal data in a way that is relevant, limited, and proportionate to the purpose: Personal data is processed by the Company to the extent necessary for the realization of these services in connection with the data processing conditions. In this context, the purpose of personal data processing is determined before the activity begins, and processing activities are not carried out based on the assumption that they may be used in the future.

Retaining personal data for the period stipulated in the relevant legislation or required for the purpose for which they are processed: The Company preserves personal data limited to the period stipulated in the relevant legislation or required by the data processing purpose. Accordingly, in case the

period stipulated in the legislation expires or the reasons requiring the processing of personal data are eliminated, personal data is immediately deleted by the Company.

(b) Compliance with Personal Data Processing Conditions

The Company carries out personal data processing activities in accordance with the data processing conditions set forth in Article 5 of the KVKK. In this context, the personal data processing activities are carried out if the personal data processing conditions listed below exist:

- Existence of the Explicit Consent of the Personal Data Owner
- Personal Data Processing Activity being Clearly Envisaged in the Laws
- Inability of the Data Owner to Express Explicit Consent Due to Actual Impossibility and Personal Data Processing being Mandatory
- Personal Data Processing Activity being Directly Related to the Establishment or Performance of a Contract
- Personal Data Processing Activity being Mandatory for the Company to Fulfill its Legal Obligation
- Data Processing being Mandatory for the Establishment, Exercise, or Protection of a Right
- The Personal Data being Made Public by the Data Owner
- Personal Data Processing Activity being Necessary for the Legitimate Interests of the Company, Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Owner

(c) Compliance with Special Category Personal Data Processing Conditions

Special category personal data may be processed in the following cases, provided that adequate measures determined by the Company are taken:

- It is mandatory for the protection of the life or physical integrity of the person who is unable to express their consent due to actual impossibility or whose consent is not granted legal validity, or of another person
- It is made public by the relevant person
- Data processing is mandatory for the establishment, exercise, or protection of a right
- It is necessary for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning, management and financing of health services by persons under the obligation of keeping secrets or authorized institutions and organizations
- It is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance
- It is directed towards current or former members and associates or persons who are in regular contact with foundations, associations, and other non-profit organizations or formations established for political, religious, or trade union purposes, provided that it is in compliance with the legislation they are subject to and their purposes, limited to their fields of activity, and not disclosed to third parties

3. RESPONSIBILITIES AND DISTRIBUTION OF DUTIES

Title	Duty
Accounting and Finance Department Manager	Except for transactions with no financial equivalent resulting from decisions taken at the Board of Directors and Executive Board level, has the authority to access, process, and destroy all data collected, stored, and processed within the scope of Company Human Resources, Accounting, Operation, Sales and Marketing, Technical Affairs processes, within their job description at the workplace.
Accounting and Finance Department Employees	Can access and process data collected, stored, and processed in relation to the execution of financial and accounting processes to a limited extent, strictly in line with their job description at the workplace, as authorized by the department manager and limited to this scope.
Technical Affairs Department Manager	Has the authority to access, process, and destroy all data collected, stored, and processed across all other departments within their job description, in order to fulfill the requests directed by customers and venue guests for technical, IT, AV operations necessary for facility management and the Company's business activities, and to provide internal technical coordination.
Technical Affairs Department Employees	Can access and process data collected, stored, and processed in relation to the execution of technical, IT, AV processes to a limited extent, strictly in line with their job description at the workplace, as authorized by the department manager and limited to this scope.
Operations Department Director	Responsible for facility management and fulfilling the requests related to cleaning, security, and operations from customers and venue guests in accordance with the Company's activities. Has authorization over operational data.