



**TAMEK SAGRA
GRUP GIDA ÜRETİM A.Ş.
PERSONAL DATA STORAGE
AND DISPOSAL POLICY**

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**TAMEK SAGRA
GRUP GIDA ÜRETİM A.Ş.
PROTECTION OF PERSONAL DATA
PERSONAL DATA STORAGE AND DISPOSAL POLICY**

1. INTRODUCTION

The protection of personal data is of great importance for **TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş.** (referred to as "**COMPANY**" or "**TAMEK SAGRA**"), and maximum sensitivity is shown in this regard. In this respect, it is one of the basic principles of "**TAMEK SAGRA**" to process personal data consistent with the expectations of individuals and in accordance with the law.

In this respect, "**TAMEK SAGRA**" preserves and disposes the personal data obtained during its activities in accordance with the general principles and regulations set forth in this Personal Data Storage and Disposal Policy ("**Policy**") prepared in accordance with Law No. 6698 on the Protection of Personal Data ("**Law**"), Regulation on the Deletion, Disposal or Anonymization of Personal Data ("**Regulation**") and other relevant national and international legislation, especially the Constitution.

2. PURPOSE AND SCOPE

This Personal Data Storage and Disposal Policy ("**Policy**") has been prepared by the "**COMPANY**" in the capacity of data controller to inform about the principles of determining the maximum storage period required to fulfill our obligations and for the purpose for which your personal data is processed and the processes of deletion, disposal and anonymization, to reflect the principles regarding the processing, preservation and disposal of personal data in accordance with Personal Data Protection Law No. 6698 ("**KVKK**" or "**Law**") and Regulation on the Deletion, Disposal or Anonymization of Personal Data ("**Regulation**"), which was published in the Official Gazette dated October 28, 2017, which constitutes the secondary regulation of the Law.

In line with the determined purpose, scope and basic principles, the "**COMPANY**" has prioritized the processing of personal data of its employees, customers, potential customers, visitors and other third parties in accordance with the Turkish Constitution, international conventions, the Law on the Protection of Personal Data No. 6698 ("**Law**") and other relevant legislation and ensuring that the relevant persons use their rights effectively.

Work and transactions regarding the storage and disposal of personal data are carried out in accordance with the Policy prepared by the "**COMPANY**" in this direction.

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3. DEFINITIONS

Transfer Group	Natural or legal person category to which personal data is transferred.
Law	Law on Protection of Personal Data dated 24/3/2016 and numbered 6698.
Explicit Consent	Consent on a particular subject, based on information and expressed with free will
Anonymization	Making personal data incapable of being associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Electronic Environment	Environments where personal data can be created, read, changed and written with electronic devices
Non-Electronic Environment	All written, printed, visual, etc. other media other than electronic media
Service Provider	Real or legal person providing services within the framework of a specific contract with the Personal Data Protection Board.
Data Subject	Real person whose personal data is processed by the “COMPANY”.
Data User	Persons who process personal data within the organization of the data controller 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 the data.
End User	Persons responsible for the implementation of security controls (access, storage, transfer, copying & distribution, disposal) of the personal data processed by the data subject, assisting the implementation of security controls for the classified personal data, and providing the technical operation during the disposal of personal data

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Disposal	Erasure, disposal or anonymization of personal data
Recording Environment	Any environment where personal data is processed wholly or partially automatically or non-automatically provided that it is a part of any data filling system.
Personal Data	Any information relating to an identified or identifiable natural person.
Sensitive Personal Data	Race/Ethnicity, Religious/Philosophical beliefs, health and sexual life, criminal history, biometric information, dress information
Data Inventory of the "COMPANY"	Inventory in which the " COMPANY " determines, taking into account the business processes, data processed as necessary for the operation and trade of the company, purpose of personal data processing activities and data categories, data transfers and related domestic or foreign recipient groups, how long these data are stored in connection with the operation of the " COMPANY ", and the details of the measures taken regarding data security.
Processing of Personal Data	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.
Periodic Disposal	All of the deletion operations made at repetitive intervals in the event that the processing conditions of the " COMPANY " disappear within the scope of Data Inventory of the " COMPANY ".
Regulation	Regulation on the Deletion, Protection and Disposal of Personal Data issued by the Personal Data Protection Authority and published in the Official Gazette on 28.10.2017.
VERBİS	Data Controllers Registry Information System

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Data Controller	Person responsible for the establishment and management of data recording systems that determine the processing purposes and means of personal data processed by the Data User and technically managed by the End User within the framework of the "COMPANY" s personal data processing policy.
Board	The Personal Data Protection Board, which was established in accordance with the Personal Data Protection Law No. 6698, with five members elected by the Turkish Grand National Assembly and four members elected by the President.
Authority	The Personal Data Protection Authority, which is headquartered in Ankara, has administrative and financial autonomy and has public legal personality, established in accordance with the Law on Protection of Personal Data No. 6698.
Data Processor	Natural or legal person who processes personal data on behalf of the data controller upon its authorization,

4. PRINCIPLES

"TAMEK SAGRA" processes Personal Data in accordance with KVKK and relevant legislation.

"TAMEK SAGRA" acts within the framework of the following principles in the storage and disposal of personal data:

1. In the deletion, disposal and anonymization of personal data, the provisions of the relevant legislation, Board decisions and this Policy are fully complied with.
2. All transactions regarding the deletion, disposal and anonymization of personal data are recorded by the **"COMPANY"** and these records are kept for at least 3 years, excluding other legal obligations.

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3. Unless a contrary decision is taken by the Board, the appropriate method of deleting, disposing or anonymizing personal data ex officio is chosen by us. However, upon the request of the Data Subject, the appropriate method will be chosen by explaining the reason.

4. In the event that all the conditions for processing personal data in Articles 5 and 6 of the Law are eliminated, personal data is deleted, disposed or anonymized by the "**COMPANY**" ex officio or upon the request of the data subject. In the event that the Data Subject applies to the "**COMPANY**" in this regard;

- Requests submitted are finalized within 30 (thirty) days at the latest and the data subject is informed.
- In case the data subject to the request has been transferred to third parties, this situation is notified to the third party to which the data is transferred and necessary actions are taken before the third parties.

5. ENVIRONMENTS WHERE PERSONAL DATA IS STORED

Personal data stored with "**TAMEK SAGRA**" are kept in a recording environment in accordance with the nature of the relevant data and our legal obligations.

The recording media used for the storage of personal data are generally listed below. However, some data may be kept in a different environment than the ones shown here, due to their special qualities or our legal obligations. In any case, the "**COMPANY**" acts as a data controller and processes and protects personal data in accordance with the Law, the Personal Data Processing and Protection Policy and this Personal Data Storage and Disposal Policy.

- Physical environments:** Media where data is kept by printing on paper or microfilms, especially unit cabinets and archives, and Manual data recording systems (survey forms, visitor logbook) Written, printed and visual media
- National digital media:** Other digital media such as servers, fixed or portable disks, optical disks and Servers (Domain, backup, e-mail, database, web, file sharing, etc.) within the "**COMPANY**" Software (office software, portal, EBYS, VERBİS.) Information security devices (firewall, intrusion detection and prevention, log file, antivirus, etc.) Personal computers (Desktop, laptop) Mobile devices (phone, tablet, etc.) Optical discs (CD, DVD, etc.) Removable memories (USB, Memory Card etc.) ,Printer, scanner, copier

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c) Cloud environments: These are the environments in which internet-based systems encrypted with cryptographic methods are used by the "**COMPANY**".

6. MEASURES TO ENSURE THE SAFETY OF ENVIRONMENTS

"**TAMEK SAGRA**" takes all necessary technical and administrative measures in accordance with the characteristics of the relevant personal data and the environment in which it is kept, in order to keep personal data safe and to prevent unlawful processing and access. These measures include, but are not limited to, the following administrative and technical measures to the extent that they comply with the nature of the personal data and the environment in which it is kept.

6.1. TECHNICAL MEASURES: The main technical measures taken by "**TAMEK SAGRA**" to ensure the legal processing of personal data are as follows:

- External data storage area (one) is used online in the "**COMPANY**".
- Backups of systems containing data are taken regularly and their reporting is done by the "**COMPANY**".
- File sharing containing personal data to real and/or legal persons is protected by the "**COMPANY**".
- There are two physical servers in the "**COMPANY**" and there is no virtualization.
- Security measures regarding the server system are taken and the server is kept under protection against external risks by the "**COMPANY**".
- Employees of the "**COMPANY**" cannot access the system with their personal devices.
- The authority matrix for the employees has been determined by the "**COMPANY**". Which employee can access which information and the limits of authority are determined.
- The software running on the devices used in the "**COMPANY**" is up-to-date and licensed.
- Anti-virus software and sand box software / hardware are up-to-date on the devices used in the "**COMPANY**".
- The "**COMPANY**" does not have a department within the scope of supply, development and maintenance of information technology systems, outsourcing services are outsourced by the "**COMPANY**".
- When external users / guests, etc., log in to the systems used in the "**COMPANY**", they cannot access the information source.
- Data loss prevention software is used by the "**COMPANY**".
- It is not possible to access the system used in the "**COMPANY**", where personal data is stored, via VPN.
- There is no personal data on the website of the "**COMPANY**".

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6.2. ADMINISTRATIVE MEASURES: The main administrative measures taken by “TAMEK SAGRA” to ensure the legal processing of personal data are as follows:

- Employees of the “COMPANY” are informed and trained on the law of protection of personal data and the processing of personal data in accordance with the law.
- All personal data processing activities carried out by the “COMPANY” are carried out in accordance with the personal data inventory and annexes created by analyzing all business units in detail.
- Personal data processing activities carried out by the relevant departments within the “COMPANY” and obligations to be fulfilled in order to ensure that these activities comply with the personal data processing conditions sought by KVKK are bound by the written policies and procedures by the “COMPANY”, and each business unit has been informed about this issue and the issues to be considered specific to the activity it carries out have been determined. In addition, protocols and procedures for sensitive personal data security have been determined and implemented.
- The supervision and management of the departments within the "COMPANY" regarding personal data security is **organized by the Personal Data Protection Committee**. Awareness is created in order to meet the legal requirements determined on the basis of the business unit, and necessary administrative measures are implemented through in-house policies, procedures and trainings to ensure the continuity of the implementation and supervision of these issues. In-house periodic and/or random audits are conducted and made.
- The service agreements and related documents between the "COMPANY" and the employees, including information and data security regarding personal data, are recorded and additional protocols are made. Studies have been carried out to create the necessary awareness for employees in this regard. The authorizations of employees who have a change in duty or quit their job in this field are removed.
- Personal data security problems are quickly reported by the "COMPANY" and personal data security is monitored.
- Necessary security measures are taken regarding entry and exit to physical environments containing personal data and the security of environments containing personal data is ensured, and the security of physical environments containing personal data against external risks (fire, flood, etc.) is provided by the "COMPANY".
- Personal data processed by the "COMPANY" are reduced as much as possible.
- Confidentiality commitments are made by the "COMPANY".
- Personal data security is monitored, periodic and/or random audits are carried out and made by the "COMPANY".
- The “COMPANY” has registered in the Data Controllers Registry by submitting the application information and documents listed in the KVKK.

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6.3. Internal Audit of the “COMPANY”

In accordance with Article 12 of the Law, the “COMPANY” performs internal audits regarding the implementation of the provisions of the Law and the provisions of this Personal Data Storage and Disposal Policy and Personal Data Processing and Protection Policy. If deficiencies or defects regarding the implementation of these provisions are detected as a result of internal audits, these deficiencies or faults are immediately corrected. If it is understood that the personal data that is under the responsibility of the "COMPANY" has been obtained by others illegally during the audit or otherwise, the "COMPANY" notifies the data subject and the Board as soon as possible.

7. DISPOSAL OF PERSONAL DATA

7.1. Reasons for Storage and Disposal

7.1.1. Reasons for Disposal and Legal Basis

Personal data held within “TAMEK SAGRA” are stored in accordance with the Law and our Personal Data Policy, for the purposes and reasons stated here. Personal data processed within the framework of the "COMPANY" activities are kept for the period stipulated in the relevant legislation. In this context, in accordance with:

- Law No. 6698 on the Protection of Personal Data,
- Turkish Code of Obligations No. 6098
- Public Procurement Law No. 4734,
- Civil Servants Law No. 657,
- Social Insurance and General Health Insurance Law No. 5510,
- Law No. 5651 on Regulation of Broadcasts on the Internet and Combating Crimes Committed Through These Broadcasts,
- Public Financial Management Law No. 5018,
- Occupational Health and Safety Law No. 6331,
- Law on Access to Information No. 4982,
- Law No. 3071 on the Use of the Right to Petition,
- Labor Law No. 4857,
- Retirement Health Law No. 5434,
- Social Services Law No. 2828
- Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Attachments,
- Regulation on Archive Services

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They are stored for as long as the storage periods stipulated within the framework of other secondary regulations in force.

7.1.2 Processing Purposes Requiring Storage

“TAMEK SAGRA” stores the personal data it processes within the framework of its activities for the following purposes.

- To provide communication within the "COMPANY".
- To ensure the "COMPANY" security,
- To be able to perform work and transactions as a result of signed contracts and protocols.
- Within the scope of VERBİS, to determine the preferences and needs of employees, data controllers, contact persons, data controller representatives and data processors, to organize the services provided accordingly and to update them if necessary.
- To ensure the fulfillment of legal obligations as required or mandated by legal regulations.
- To contact the real / legal persons who have a business relationship with the "COMPANY".
- Making legal reports.
- Carrying out human resources processes
- To be able to do statistical studies.

7.2. Reasons for Disposal

Personal data within “TAMEK SAGRA” are deleted, disposed or anonymized ex officio in accordance with this disposal policy, upon the request of the data subject or in case the reasons listed in Articles 5 and 6 of the Law are eliminated. The reasons listed in Articles 5 and 6 of the Law are as follows.

- It is expressly provided for by the laws.
- It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.
- It is necessary for compliance with a legal obligation to which the data controller is subject.
- Personal data have been made public by the data subject himself/herself.
- Data processing is necessary for the establishment, exercise or protection of any right.

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- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

8. DISPOSAL METHODS

In the event that the reasons requiring the processing of the data disappear, “**TAMEK SAGRA**” will **delete, dispose or anonymize** personal data stored in accordance with the Law and other legislation and the Policy on the Processing and Protection of Personal Data ex officio, upon the request of the data subject or within the periods specified in this Personal Data Storage and Disposal Policy.

8.1. Deletion Methods

Deletion Methods for Personal Data Stored in Printed Media	
Blackout	Personal data in the printed media are deleted using the blackout method. The blackout process is done by cutting the personal data on the relevant document when possible, and making it invisible by using fixed ink in a way that it cannot be readable with technological solutions, in cases where it is not possible.
Deletion Methods for Personal Data Stored in Cloud and Local Digital Environment	
Secure deletion from software	Personal data stored in the cloud or local digital environments are deleted with a digital command, irrecoverably. Data deleted in this way cannot be accessed again.

8.2. Disposal Methods

Disposal Methods for Personal Data Stored in Printed Media	
Physical disposal	Forms, files, papers that are physically kept in the printed environment are disposed by the shredder method/burning so that they cannot be reassembled.
Disposal Methods for Personal Data Stored in Local Digital Environment	
Physical disposal	Process of physically disposing optical and magnetic environment containing personal data, such as melting, burning or pulverizing.

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	Data is rendered inaccessible by processes such as melting, incinerating, pulverizing, or passing optical or magnetic media through a metal grinder.
Degauss	Process of unreadable corruption of the data on the magnetic media by exposing it to a high magnetic field.
Overwriting	Random data consisting of 0s and 1s is written at least seven times on magnetic media and rewritable optical media, preventing reading and recovery of old data.
Disposal Methods for Personal Data Stored in Cloud Environment	
Secure deletion from software	Personal data kept in the cloud is irrecoverably deleted by digital command, and when the cloud computing service relationship ends, all copies of encryption keys required to make personal data usable are disposed. Data deleted in this way cannot be accessed again.

8.3. Anonymization Methods

Making personal data incapable of being associated with an identified or identifiable natural person under any circumstances even by matching with other data.

Subtracting variables	Removal of one or more of the direct identifiers included in the personal data of the data subject and which will help to identify the data subject in any way. This method can be used to anonymize personal data, or it can also be used for deletion of personal data if there is information that is not suitable for the purpose of data processing.
Regional hiding	Process of deleting the information that may be distinctive about the exceptional data in the data table in which the personal data is collected in an anonymous form.
Generalization	It is the process of bringing together the personal data of many people and turning them into statistical data by removing their distinctive information.
Lower and upper bound coding / Global coding	For a certain variable, the ranges of that variable are defined and categorized.

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	If the variable does not contain a numeric value, then close data in the variable are categorized. Values within the same category are combined.
Micro-merging	With this method, all the records in the data set are first arranged in a meaningful order and then the whole set is divided into a certain number of subsets. Then, by taking the average of the value of each subset of the determined variable, the value of that variable of the subset is replaced with the mean value. In this way, since the indirect identifiers in the data will be corrupted, it is difficult to associate the data with the data subject.
Data hashing and tampering	Direct or indirect identifiers in personal data are mixed with other values or their relationship with the data subject is broken and they lose their descriptive qualities.

9. STORAGE AND PERIODIC DISPOSAL TIMES

Personal Data Source	Duration	Legal Basis
All Records Related to Accounting and Financial Transactions	10 Years	Law No. 6102, Law No. 213
Personal Data Regarding Customers	3 years if within the framework of Law No. 6563 and related legislation, 10 Years after the legal relationship ends	Law No. 6563, Law No. 6102, Law No. 6098, Law No. 213, Law No. 6502
Personal Data Regarding Suppliers	10 Years after the legal relationship ends	Law No. 6102, Law No. 6098 and Law No. 213
Personal Data Protection Board Transactions	10 Years	Personal Data Protection Authority Personal Data Storage and Disposal Policy Published by KVKK (Turkish Law on Protection of Personal Data)

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Agreements	10 Years From Agreement Termination	Personal Data Protection Authority Personal Data Storage and Disposal Policy Published by KVKK (Turkish Law on Protection of Personal Data)
Human Resources Processes	10 Years From End of Activity	Personal Data Protection Authority Personal Data Storage and Disposal Policy Published by KVKK (Turkish Law on Protection of Personal Data)
Hardware and Software Access Processes	2 Years	Personal Data Protection Authority Personal Data Storage and Disposal Policy Published by KVKK (Turkish Law on Protection of Personal Data)
Registration of Visitors and Meeting Users	2 Years From Event Ending	Personal Data Protection Authority Personal Data Storage and Disposal Policy Published by KVKK (Turkish Law on Protection of Personal Data)
Data Stored under the Labor Law (e.g., severance pay, notice pay, bad faith compensation, information that may be subject to compensation for violation of the principle of equal treatment, payroll records, number of annual leave days, etc.)	5 Years from the end of the Business Relationship	Labor Law No. 4857 and Related Legislation
Data on Personal Files Stored under the Labor Law	10 Years from the end of the Business Relationship	Labor Law No. 4857 and Related Legislation / Turkish Code of Obligations No. 6098
Data Collected within the Scope of Occupational Health and Safety Legislation (e.g. Recruitment health tests, health reports, OHS Trainings, Occupational Health and Safety records, etc.)	15 Years from the end of the Business Relationship	Occupational Health and Safety Law No. 6331, Occupational Health and Safety Services Regulation

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Data kept within the scope of SSI Legislation (e.g.: Employment notices, bonus/service documents, etc.)	10 Years from the end of the Business Relationship	Social Insurance and General Health Insurance Law No. 5510 and Related Legislation
Pursuant to the Labor Law: Answering court/executive information requests regarding the employee	10 Years from the end of the Business Relationship	Labor Law No. 4857 and Related Legislation
Employee Access Restrictions	10 Years from the end of the Business Relationship	Labor Law No. 4857 and Related Legislation
Information of Company Partners and Members of the Board of Directors (e.g.: Attendance rights and Dividend payments etc.)	10 Years	Turkish Commercial Code No. 6102
Information of Company Partners and Members of the Board of Directors (Personal data in the share ledger)	Due to the Obligation to Keep the Share Book indefinitely	Turkish Commercial Code No. 6102
Scholarship payment / Employee Advance Payment	10 Years	Turkish Commercial Code No. 6102
Job Application / Internship Application / If Application Is Not Accepted, Data Regarding Candidate Applications (e.g.: CV, Resume, Cover)	1 Years	Sectoral practices apply.
Data Processed in accordance with Corporate Communication Activities for Employees (e.g.: Participant List etc.)	10 Years from the end of the Business Relationship	Sectoral Practice

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Data on Employee Satisfaction Surveys	1 Year following the end of the year in which the questionnaire was filled	Sectoral Practice
In accordance with the Company's Activities, Commercial Books to be Kept, Documents Created Based on the Records in the Commercial Books, Financial Statements etc. Processed Personal Data	10 Years	Turkish Commercial Code No. 6102
Data Processed in Accordance with General Board Procedures	10 Years	Turkish Commercial Code No. 6102
Personal Data Regarding the Establishment and Content of Agreements to which the Company is a Party	10 Years	Turkish Commercial Code No. 6102
Personal Data Processed in Contractual Relationships (e.g.: Company Official, Name Surname, circular of signature, etc.)	10 Years After Agreement Termination	Turkish Code of Obligations No. 6098
Personal Data Regarding Tax Records	5 Years	Tax Procedure Law No. 213
Personal Data Processed with Documents Required to Be Kept in accordance with the Tax Procedure Law, such as Invoice/Expense Compass/Receipt	5 Years	Tax Procedure Law No. 213
Personal Data of Visitors	2 Years	Law No. 5651 (For Visitors Accessing the Company's Wi-Fi Network)

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Personal Data Processed for Security Purposes in Accordance with CCTV Cameras (Camera Records)	30 Days	Sectoral Practice
Visual and Audio Recordings	6 Months	Sectoral Practice
Personal Data Processed Due to the Obligation to Provide After-Sales Service in accordance with the Consumer Protection Law No. 6502 (e.g.: Product installation date, customer contact information) Customer Transaction Information (Call Records of Customers' Requests/Complaints/Suggestions etc.) Customer Transaction Information (Call Records of Customers' Requests/Complaints/Suggestions etc.)	15 Years 10 Years 10 Years	Law No. 6502 on the Protection of the Consumer, After Sales Services Regulation Published in the Official Gazette dated 13.06.2014 and numbered 29029 Turkish Code of Obligations No. 6098 Turkish Code of Obligations No. 6098
Data on Potential Customers (e.g.: cookies, data on profiling via LinkedIn)	13 Months	European Union / Sectoral Practice
Personal Data of a Deceased Person	10 Years	Labor Law No. 4857 and Related Legislation / Turkish Code of Obligations No. 6098

In case a longer period is regulated in accordance with the legislation or a longer period is stipulated for the statute of limitations, foreclosure period, storage periods, etc., the periods in the provisions of the legislation are considered as the maximum storage period.

10. DISPOSAL PERIOD

“TAMEK SAGRA” deletes, disposes or anonymizes personal data in the first periodical disposal process following the date on which the obligation to delete, dispose or anonymize personal data for which it is responsible in accordance with Law, relevant legislation, Personal Data Processing and Protection Policy and this Personal Data Storage and Disposal Policy arises.

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When the data subject requests the deletion or disposal of her/his personal data by applying to the **“COMPANY”** pursuant to Article 13 of the Law;

- If all the conditions for processing personal data are no longer valid, the **“COMPANY”** deletes, disposes or anonymizes the personal data subject to the request with the appropriate destruction method within 30 (thirty) days from the day it receives the request, by explaining the reason. In order for the **“COMPANY”** to be deemed to have received the request, the data subject must have made the request in accordance with the Personal Data Processing and Protection Policy. In any case, the **“COMPANY”** informs the data subject about the transaction.
- If all the conditions for processing personal data have not been eliminated, this request may be rejected by the **“COMPANY”** by explaining the reason in accordance with the third paragraph of Article 13 of the Law and the refusal is notified to the relevant person in writing or electronically within thirty days at the latest.

11. PERIODIC DISPOSAL

In the event that all the conditions for processing personal data in the law are eliminated, **“TAMEK SAGRA”** deletes, disposes or anonymizes the personal data whose processing conditions have been eliminated, through a process to be carried out ex officio at repetitive intervals and specified in this Personal Data Storage and Disposal Policy.

Periodic disposal processes start for the first time on 01.01.2023 and repeat every 6 (six) months.

12. AUDIT OF LEGAL COMPLIANCE OF DISPOSAL

“TAMEK SAGRA” carries out the disposal processes, which it performs ex officio upon request and in periodic disposal processes, in accordance with the Law, other legislation, the Policy on the Processing and Protection of Personal Data and this Personal Data Storage and Disposal Policy. The **“COMPANY”** takes a number of administrative and technical measures to ensure that the disposal processes are carried out in accordance with these regulations.

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12.1. Technical Measures

- The **"COMPANY"** has technical tools and equipment suitable for each disposal method in this policy.
- The **"COMPANY"** ensures the safety of the place where disposal operations are made.
- The **"COMPANY"** keeps the access records of the people who carry out the disposal process.
- The **"COMPANY"** employs competent and experienced personnel to carry out the disposal process or receives service from competent third parties when necessary.

12.3. Administrative Measures

- The **"COMPANY"** works to increase the awareness and raise awareness of its employees who will carry out the disposal process on information security, personal data and privacy.
- The **"COMPANY"** receives legal and technical consultancy services in order to follow the developments in the field of information security, privacy, protection of personal data and safe disposal techniques and to take necessary actions.
- In cases where the **"COMPANY"** has third parties do the disposal due to technical or legal requirements, it signs protocols with the relevant third parties for the protection of personal data, and takes all necessary care to ensure that the relevant third parties comply with their obligations in these protocols.
- The **"COMPANY"** regularly checks whether the disposal processes are carried out in accordance with the law and the conditions and obligations set forth in this Personal Data Storage and Disposal Policy.
- The **"COMPANY"** records all transactions regarding the deletion, disposal and anonymization of personal data and keeps the said records for at least three years, excluding other legal obligations.

13. PERSONAL DATA PROTECTION COMMITTEE

"TAMEK SAGRA" establishes a Personal Data Protection Committee. The Personal Data Protection Committee is authorized and tasked to perform/have performed the necessary procedures and supervise the processes for the storage and processing of the data of the relevant persons in accordance with the law, the Personal Data Processing and Protection Policy and the Personal Data Storage and Destruction Policy. The Personal Data Protection Committee consists of at least 5 people, including a responsible manager, an administrative expert and a technical expert. The titles and job descriptions of the **"COMPANY"** employees working in the Personal Data Protection Committee are as follows:

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Title	Job Description	ID Information
Personal Data Protection Committee Manager	Responsible for directing all kinds of planning, analysis, research and risk determination studies in projects carried out in the process of compliance with the law, and deciding on the requests received by the data subjects. It is responsible for directing all kinds of planning, analysis, research and risk determination activities in projects carried out in the process of compliance with the law; managing the processes that must be carried out in accordance with the Law, the Personal Data Processing and Protection Policy and the	Representative of Legal Consultancy
Member	KVKK Committee Members Responsible for ensuring coordination between units.	Production Directorate Representative Supply Chain Directorate Representative Marketing Directorate Representative Financial Affairs Directorate Representative
KVKK Specialist (Technical and Administrative)	Responsible for examining the requests of the relevant persons and reporting them to the Personal Data Committee Manager for evaluation; carrying out the procedures regarding the requests of the relevant persons evaluated and decided by the Personal Data Committee Manager in accordance with the decision of the Personal Data Committee Manager; auditing the storage and destruction processes and reporting these audits to the Personal Data Committee Manager; carrying out the storage and destruction processes.	Technical Personnel Representative of Information Systems Directorate Administrative Personnel Human Resources Department Representative

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GRUP GIDA ÜRETİM A.Ş.
PERSONAL DATA STORAGE
AND DISPOSAL POLICY**

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14. UPDATE AND COMPLIANCE

“TAMEK SAGRA” reserves the right to make changes in the Personal Data Processing and Protection Policy or this Personal Data Storage and Disposal Policy due to changes in the law, in accordance with company decisions or developments in the sector or in the field of informatics. Changes made in this Personal Data Storage and Disposal Policy will be immediately transcribed and explanations regarding the changes will be announced at the end of the policy. The Personal Data Storage and Disposal Policy was published on **01.01.2023**.

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