

	Kayakapi Tour. Yat. Tic. A.S. PERSONAL DATA STORAGE AND DESTRUCTION POLICY	Publication Date: 29.11.2022
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CHAPTER 1: NATURE AND PURPOSE OF THE EXTERMINATION POLICY

1.1. INTRODUCTION

This destruction policy has been prepared in order to determine the procedures and principles to be applied by the Company regarding the deletion, destruction or anonymization of personal data in accordance with the Personal Data Protection Law No. 6698 and other legislation of the personal data we hold in the capacity of data controller as Kayakapi Turizm Yatırım Ticaret A.Ş. ("Company").

In this context, the personal data of our employees, employee candidates, guests, visitors and suppliers, and all natural persons who have personal data with the Company for any reason, are managed in accordance with the laws within the framework of the Personal Data Processing and Protection Policy and this Personal Data Retention and Destruction Policy.

1.2. DEFINITIONS

Relevant person: The natural person whose personal data is processed,

Destruction: Deletion, destruction or anonymization of personal data,

Law: Personal Data Protection Law No. 6698 published in the Official Gazette dated 07.04.2016 and numbered 29677,

Regulation: Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28.10.2017 and numbered 30224

Board: Personal Data Protection Board

Recording medium: Any medium containing personal data that is fully or partially automated or processed by non-automated means, provided that it is part of any data recording system,


Personal Data Processing and Protection Policy: The policy that can be accessed at www.kayakapi.com/kvkk, which determines the procedures and principles regarding the management of personal data held by the Company,

Data recording system (Sispar) :Refers to the recording system where personal data is structured and processed according to certain criteria.

CHAPTER 2: ENVIRONMENTS AND SAFETY MEASURES

2.1. MEDIA WHERE PERSONAL DATA ARE STORED

Personal data stored by the Company are kept in a recording environment in accordance with the nature of the relevant data and our legal obligations.

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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 environments shown here due to their special qualities or our legal obligations. In any case, the Company acts in the capacity of 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 Destruction Policy.

a) Printed media: Media where data is stored by printing it on paper.

b) Local digital media: Servers, fixed or portable disks, optical disks and other digital media within the Company.

c) Cloud environments: These are the environments where the internet-based system encrypted with different methods can be used, although it is not located within the Company.

2.2. ENSURING THE SAFETY OF ENVIRONMENTS

The Company takes all necessary technical and administrative measures in accordance with the nature of the relevant personal data and the environment in which it is kept in order to store personal data securely and to prevent unlawful processing and access.

These measures include, but are not limited to, the following administrative and technical measures to the extent appropriate to the nature of the personal data concerned and the environment in which it is kept.

2.2.1. Technical Measures

The Company takes the following technical measures in all environments where personal data is stored in accordance with the characteristics of the relevant data and the environment in which the data is stored:

Only up-to-date and secure systems in accordance with technological developments are used in the environments where personal data are kept.

Security systems are used for the environments where personal data are kept.

Security tests and researches are conducted to identify security vulnerabilities on information systems, and existing or potential risks identified as a result of the tests and researches are eliminated.

Access to the environments where personal data is kept is restricted and only authorized persons are allowed to access this data limited to the purpose of processing personal data and all accesses are recorded.

The Company employs sufficient technical personnel to ensure the security of the environments where personal data are kept.

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2.2.2. Administrative Measures

The Company takes the following administrative measures in all environments where personal data is stored in accordance with the nature of the relevant data and the environment in which the data is stored:

Trainings are provided to all Company employees who have access to personal data to raise awareness and raise awareness on information security, personal data and privacy.

Legal and technical consultancy services are obtained in order to follow developments in the field of information security, privacy and protection of personal data and to take necessary actions.

In the event that personal data is transferred to third parties due to technical or legal requirements, protocols are signed with the relevant third parties for the protection of personal data, and all necessary care is taken to ensure that the relevant third parties comply with their obligations in these protocols.

2.2.3. Internal and External Audit

Pursuant to Article 12 of the Law, the Company conducts internal and external audits regarding the implementation of the provisions of the Law and the provisions of this Personal Data Storage and Destruction 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 and external audits, these deficiencies or defects shall be corrected immediately.

In the event that it is understood that the personal data under the responsibility of the Company is obtained by others illegally during the audit or in any other way, the Company shall notify the relevant person and the Board as soon as possible.

SECTION 3: DESTRUCTION OF PERSONAL DATA

3.1. REASONS FOR STORAGE AND DISPOSAL

3.1.1. Reasons for Retention

Personal data kept within the Company are stored for the purposes and reasons specified herein in accordance with the Law and our Personal Data Policy (you can access the relevant policy at "www.kayakapi.com/kvkk").

3.1.2. Reasons for Destruction

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Personal data within the Company shall be deleted, destroyed or anonymized ex officio in accordance with this destruction policy upon the request of the person concerned or in the event that the reasons listed in Articles 5 and 6 of the Law disappear.

The reasons listed in Articles 5 and 6 of the Law are the following:

Explicitly stipulated in the law.

It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

Provided that it is directly related to the conclusion or performance of a contract, it is necessary to process personal data of the parties to the contract.

It is mandatory for the data controller to fulfill its legal obligation.

It has been made public by the person concerned.

Data processing is mandatory for the establishment, exercise or protection of a right.

Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

3.2. DESTRUCTION METHODS

The Company deletes, destroys or anonymizes the personal data that it stores in accordance with the Law and other legislation and the Policy on Processing and Protection of Personal Data, upon the request of the data subject or ex officio within the periods specified in this Personal Data Retention and Destruction Policy, if the reasons requiring the processing of the data disappear.

The most commonly used deletion, destruction and anonymization techniques used by the Company are listed below.


3.2.1.1.1 Deletion Methods

Deletion Methods for Personal Data Stored in Printed Media

Blackout Personal data in printed media are erased using the blackout method. The blackout process is performed by cutting out the personal data on the relevant document, where possible, and making it invisible by using fixed ink in a way that cannot be reversed and cannot be read with technological solutions.

Deletion Methods for Personal Data Stored in Cloud and Local Digital Environment

Secure erasure from software: Personal data stored in the cloud or on local digital media is deleted by digital command so that it cannot be recovered. Data deleted in this way cannot be accessed again.

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3.2.1.2 Destruction Methods

Destruction Methods for Personal Data Stored in Printed Media

Physical destruction: Documents kept in printed form are destroyed by document shredders in such a way that they cannot be reassembled.

Destruction Methods for Personal Data Stored in Local Digital Media

Physical destruction: The process of physically destroying optical and magnetic media containing personal data, such as melting, burning or pulverizing them. The data is rendered inaccessible by melting, burning, pulverizing or passing the optical or magnetic media through a metal grinder.

Overwriting: Random data consisting of 0s and 1s are written at least seven times on magnetic media and rewritable optical media, preventing old data from being read and recovered.

3.2.1.3. Anonymization Methods

Anonymization is the process of making personal data impossible to associate with an identified or identifiable natural person under any circumstances, even by matching it with other data.

Removing variables: The removal of one or more of the direct identifiers contained in the personal data of the data subject that can be used to identify the data subject in any way.

This method can be used to anonymize personal data, as well as to delete personal data if there is information in the personal data that is not suitable for the purpose of data processing.

Regional hiding: It is the process of deleting the information that may be distinctive for the data that is in an exceptional situation in the data table where personal data are collectively anonymized.

Generalization: The process of combining personal data belonging to many people and turning them into statistical data by removing their distinctive information.

Data mixing and corruption: Direct or indirect identifiers in personal data are mixed or distorted with other values so that their relationship with the data subject is severed and they lose their identifying characteristics.

3.3. STORAGE AND DISPOSAL PERIODS

3.3.1. Storage Periods

Employee

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Employee, recruitment documents and personal data based on the notifications made to the Social Security Institution regarding the duration of service and wages shall be kept for 20 (twenty) years during the continuation and termination of the service contract.

Employee, recruitment documents and personal data other than personal data based on notifications to the Social Security Institution regarding the duration of service and wages are kept for 10 (ten) years from the beginning of the calendar year following the continuation and termination of the service contract.

The Data in the Employee, Workplace Personal Health File shall be kept for 15 (fifteen) years from the continuation and termination of the service contract.

Business Partner

Identity information, contact information, financial information, voice recordings of phone calls, Business Partner/Solution Partner/Consultant employee data regarding the execution of the commercial relationship between the Business Partner and the Company

The Business Partner shall be kept for 10 years during and after the termination of the business/commercial relationship with the Company in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code.

Visitor

The name, surname, T.R.K.N., vehicle license plate number and camera recordings of the Visitor taken at the entrance to the physical space of the Company, and voice recordings taken during phone calls are kept for 2 years.

Website Visitor

The name, surname, e-mail address, browsing movements information of the Website Visitor is stored for 2 years.

Employee Candidate

The information contained in the CV and job application form of the Employee Candidate is kept for a maximum of 2 years, for the period of time that the CV will lose its currency.

Intern(student)

The information contained in the internship file of the intern is kept for 10 (ten) years from the beginning of the calendar year following the continuation and completion of the internship relationship.

Guest

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Guest's name, surname, T.R.K.N., contact information, payment information and methods, location information, voice recordings received during phone calls, service preferences, transaction history, special day information,

Each service purchased by the guest is retained for a period of 10 years from the date of delivery in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code.

Guest Camera footage is stored for 30 days and vehicle license plate information is stored for 10 years.

Institutions/Companies in Cooperation with the COMPANY (Supplier)

Identity information, contact information, financial information, voice recordings received during phone calls, data on the execution of the commercial relationship between the COMPANY and the Institutions/Companies with which the Company is in cooperation, data on the employees of the Institutions/Companies with which the Company is in cooperation

The information of the Institutions/Companies with which the Company is in cooperation shall be kept for 10 years during and after the termination of the business/commercial relationship with the Company in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code.

3.3.2. Destruction Periods

The Company deletes, destroys or anonymizes personal data in the first periodic destruction process following the date on which the obligation to delete, destroy or anonymize the personal data for which it is responsible in accordance with the Law, relevant legislation, Personal Data Processing and Protection Policy and this Personal Data Storage and Destruction Policy arises.

When the relevant person applies to the Company pursuant to Article 13 of the Law and requests the deletion or destruction of his personal data;

If all the conditions for processing personal data have disappeared; The Company deletes, destroys or anonymizes the personal data subject to the request within 30 (thirty) days from the day it receives the request, explaining the reason for it, with the appropriate destruction method. In order for the Company to be deemed to have received the request, the person concerned must have made the request in accordance with the Personal Data Processing and Protection Policy. In any case, the Company shall inform the relevant person about the transaction.

If all the conditions for processing personal data have not disappeared, this request may be rejected by the Company by explaining the reason in accordance with the third paragraph of

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Article 13 of the Law and the rejection response shall be notified to the data subject in writing or electronically within thirty days at the latest.

3.4. PERIODIC DESTRUCTION

In the event that all of the conditions for processing personal data specified in the Law disappear; The Company deletes, destroys or anonymizes the personal data whose processing conditions have disappeared by a process specified in this Personal Data Storage and Destruction Policy and to be carried out ex officio at recurring intervals.

Periodic destruction processes start for the first time on 28.12.2018 and repeat every 6 (six) months.

3.5. SUPERVISION OF THE LEGALITY OF DESTRUCTION

The Company performs its ex officio destruction operations both upon request and in periodic destruction processes in accordance with the Law, other legislation, the Personal Data Processing and Protection Policy and this Personal Data Storage and Destruction Policy.

The Company takes a number of administrative and technical measures to ensure that destruction operations are carried out in accordance with these regulations.

3.5.1. Technical Measures

The Company maintains technical tools and equipment suitable for each destruction method in this policy.

The company ensures the security of the place where the destruction operations are carried out.

The Company keeps access records of the persons who carry out the destruction.


The Company employs competent and experienced staff to carry out the destruction process or receives services from competent third parties when necessary.

3.5.2. Administrative Measures

The Company provides trainings to raise awareness and raise awareness of its employees who will carry out the destruction process on information security, personal data and privacy.

The Company receives legal and technical consultancy services in order to follow developments in the field of information security, privacy, protection of personal data and secure destruction techniques and to take necessary actions.

In cases where the Company outsources the destruction process to third parties due to technical or legal requirements, the Company signs protocols with the relevant third parties

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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 audits whether the destruction operations are carried out in accordance with the law and the conditions and obligations specified in this Personal Data Storage and Destruction Policy, and takes the necessary actions.

The Company records all transactions regarding the deletion, destruction and anonymization of personal data and keeps such records for at least three years, excluding other legal obligations.

SECTION 4: PERSONAL DATA COMMITTEE

Establishes a Personal Data Committee within the Company. The Personal Data Committee is authorized and tasked with taking the necessary actions and supervising the processes for the storage and processing of the data of the data subjects in accordance with the law, the Personal Data Processing and Protection Policy and the Personal Data Storage and Destruction Policy.

The Personal Data Committee consists of three people: a manager, an administrative expert and a technical expert. The job descriptions of the company employees assigned to the Personal Data Committee are as follows:


Job Description

Personal Data Committee Manager :

It is obliged to direct all kinds of planning, analysis, research, risk identification studies in the projects carried out in the process of compliance with the Law; to manage the processes to be carried out in accordance with the Law, Personal Data Processing and Protection Policy and Personal Data Storage and Destruction Policy and to resolve the requests received by the relevant persons.

KVKK Specialist (Technical and Administrative) :Responsible for examining the requests of the data subjects and reporting them to the Personal Data Committee Manager for evaluation; carrying out the transactions regarding the requests of the data subjects 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.

SECTION 5: UPDATE AND HARMONIZATION

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The COMPANY reserves the right to make changes to the Personal Data Processing and Protection Policy or this Personal Data Storage and Destruction Policy due to amendments to the Law, in accordance with the decisions of the Authority or in line with developments in the sector or in the field of informatics.

Changes made to this Personal Data Storage and Destruction Policy are immediately incorporated into the text and explanations regarding the changes are explained at the end of the policy.

5.1 AMENDMENT NOTES

28.12.2018 :Personal Data Retention and Destruction Policy was published.

*There are no earlier amendments.