

GÜLERMAK - PERSONAL DATA STORAGE AND DISPOSAL POLICY

I. PURPOS EOF PERSONAL DATA STORAGE AND DISPOSAL POLICY

Gülermak Ağır Sanayi İnşaat ve Taahhüt Anonim Şirketi (“**Gülermak**”); attaches importance on processing personal data owned by any real persons such as Gülermak shareholders, members of board of directors, personnel, employees of Gülermak’s subcontractors, representatives of the firms cooperated and visitors of Gülermak facilities primarily in compliance with The Law on Protection of Personal Data (“**KVK Law**”) numbered 6698 and relevant legislation (“**KVK Legislation**”) and to ensure persons having their personal data processed to utilize their statutory rights in an effective manner.

The preparation of the Personal Data Storage and Disposal Policy is an obligation under the KVK Legislation as well as a requirement for the data official to determine the procedures and principles of the personal data storage and disposal processes. Personal Data Storage and Disposal Policy intends to designate and monitoring recoding media of the personal data processed by data official and reasons requiring storage of the personal data, conditions of storage, means of ensuring security of the personal data, secure disposal of the data with no necessity of processing and legal and technical actions to be taken to establish the whole system.

Gülermak has established rules for storing personal data it process and disposal of those expired the necessity of processing with this Personal Data Storage and Disposal Policy and realizes in accordance with this policy.

II. DEFINITIONS

Express Consent	It means the consent that is based on information and which is explained with free will.
Receiver Group	It means the category of real or legal persons where personal data are transferred by the data official.
Making Anonymous	It means making personal data in no way to be interrelated with a real person whose identity is definite or can be defined even by matching with other data.
Relevant Person	It means the real person whose personal data processed.
Disposal	It means deleting, terminating or making anonymous the personal data.
Recording Means	It means any media in which personal data is processed, either fully or partially automated, or processed by non-automated means, provided that it is part of any data recording system.
Personal Data	It means every kind of information in relation with a real person whose identity in definite or can be defined.

Personal Data Processing Inventory	It means Personal data processing activities performed by the data officials according to the business processes; personal data processing purposes and legal reason, data category, the maximum amount of retention time required for the purposes in which the personal data are processed and linked to the group of recipients, inventory where they define and detail personal data anticipated to be transferred to foreign countries and actions taken for data security.
Personal Data Storage and Disposal Policy	It means the process by which data officials determine the maximum time required for the purpose for which personal data is processed and policy they made basis for deleting, terminating and making anonymous.
Making Personal Data Anonymous	It means making personal data in no way to be interrelated with a real person whose identity is definite or can be defined even by matching with other data.
Personal Data Processing	It means any procedure realized on data such as obtaining, recording, storing, maintaining, modifying, rearranging, defining, transferring, taking over, making them obtainable, classifying or preventing the use of personal data in whole or in part by automated or non-automated means provided that it is part of any data recording system.
Deleting Personal Data	Refers to the process of making personal data inaccessible and reusable for the users concerned.
Terminating Personal Data	Refers to the process of making personal data inaccessible, non-recoverable and reusable by anyone.
Council	Refers to Personal Data Protection Council.
Organization	Refers to Personal Data Protection Organization.
Special Quality Personal Data	Refers to data on the race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costume and clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures and biometric and genetic data of individuals.

Periodical Disposal	Refers to the deletion, destruction or anonymization of the personal data in the event of the elimination of all the processing conditions of the personal data contained in the law and to be carried out ex officio at repeated intervals specified in the policy of storing and destroying personal data.
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Register	Refers to the register of data officials kept by Presidency of Personal Data Protection Organization.
Data Processor	Refers to the natural or legal person who processes personal data on its behalf based on the authority given by the data official.
Data Recording System	Refers to the recording system in which personal data is structured and processed according to certain criteria.
Data Official	Refers to the natural or legal person who determines the purposes and means of processing personal data and who is responsible for the establishment and management of the data recording system.
Regulation	It means regulation on deleting, terminating or making anonymous the personal data.

III. RECORDING MEANS

Personal data processed by Gülermak are stored on the recording media specified in the table below.

Physical Recording Means	Electronic Recording Means
Papers, books	Servers
Files	Software existing in computers
Unit closets	Files kept in computer media
Archive rooms	External Hard Drives
Security, Secretariat Closets	Identity identification devices in entry-exit points

IV. REASONS REQUIRING THE STORAGE AND DISPOSAL OF PERSONAL DATA

a. Reasons Requiring the Storage of Personal Data

KVK Law sets the conditions for the processing of personal data. Gülermak processes all personal data based on at least one of these conditions. Process conditions being basis to Gülermak's personal data processing:

- To be explicitly foreseen in Laws
- Contract parties' personal data required to be processed save to be directly in relation with establishing or execution of a contract.

- To be mandatory to enable data official to fulfil his/her legal obligation
- Data processing to be compulsory for the establishment, use or protection of a right
- Data processing to be mandatory for the interests of the data official save not to harm basic rights and freedoms of the relevant person

One of the most important processing conditions that require Gülermak to store the data it processes is that the law clearly stating that it should be stored. Major laws requiring Gülermak to store personal data within the scope of its works and processes:

- Labor Law numbered 4857,
- Occupational Health and Safety Law numbered 6331,
- Social Security and General Health Insurance Law numbered 5510,
- Retirement Fund Law numbered 5434,
- Public Procurement Law numbered 4734,
- Turkish Code of Obligations numbered 6098

Personal data processing purposes requiring Gülermak to store the data it processes and fall under other processing conditions:

- Executing management activities,
- Executing finance and accounting works,
- Managing human resources processes,
- Managing company activities,
- Ensuring fulfilment of legal/contractual obligations towards employees,
- To ensure fixing and follow-up whether employees fulfill legal/contractual requirements,
- To ensure mutual fulfillment of legal and contractual obligations during the works carried out with third parties and institutions,
- To ensure the safety of life, goods and data in the company,
- To inform authorized persons, agencies and institutions,
- To ensure communication with intercompany and third persons/institutions,
- To be able to present evidences if being party to legal disputes.

b. Reasons Requiring the Disposal of Personal Data

Gülermak disposes personal data it supplies in the following circumstances:

- Amendment or abolition of the provisions of the legislation constituting the basis for the processing of personal data,
- Remaining no purpose requiring processing or storing personal data,
- When the personal data is processed only in cases where the express consent is based on the requirement of explicit consent, the person concerned withdrawing his express consent,
- Gülermak accepting the referral made by the relevant person for deleting or terminating his personal data being processed based on rights he own according to Article 11 of KVK Law,
- Following the application of the above-mentioned person, the person concerned complains to the Council due to the conditions specified in the law and the Council approves the request of the person concerned,
- Maximum period requiring storage of personal data to be expired and being no purpose-conditions to enforce longer storage of personal data.

V. ADMINISTRATIVE AND TECHNICAL ACTIONS

Gülermak pursuant to KVK Law Article 6 and 12 takes necessary administrative and technical actions for the safe storage of personal data, and the prevention of unlawful processing and access to personal data and their legal disposal.

a. Administrative Actions

Establishing current risks and threats→Gülermak by considering whether personal data is a personal data of a specific nature, the degree of confidentiality required by nature, the nature and quantity of damage that may arise in respect of the Person concerned in the event of a security breach and paid attention not to acquire any unnecessary data and in case if it is necessary to process special quality personal data, explicit consents of people sought, confidential documents are only stored in places to be accessed by authorized persons and personal data after their purpose of process removed are erased, terminated or made anonymous.

Employees training and awareness rising studies→Gülermak has informed its employees about issues such as not disclosing and sharing personal data as contrary to law, employee awareness has been created, required actions were taken by establishing security risks, roles and obligations, job definitions of the employees for personal data security were established, contracts concluded with employees for the confidentiality of the personal data, required articles added to labor contract and worker regulation and a disciplinary process to be involved in case of employees failing to obey security policies and procedures.

Establishing personal data security policies and procedures→Gülermak has determined which personal data was found in the data recording systems and created an inventory with these data, the current security measures were investigated and compliance with legal obligations were ensured, policies and procedures were prepared, required actions were taken by designating problematic areas, regular control periods were established and certified and controls initiated accordingly and it was decided to set out and making required updates for

the issued needed to be developed in the controls and it was also established how to manage security breaches and risks those may rise about every personal data category.

Reducing personal data as much as possible→Personal data are processed by Gülermak in an accurate and up-to-date manner and maintained for the period required by the relevant legislation or for the purpose for which it was processed, it is assessed whether personal data processed during periodical controls still needed, unwanted personal data are deleted, terminated or made anonymous in line with personal data storage and disposal policy, data requiring no frequent access and those kept for archiving purposes are kept in more secure media to prevent unauthorized access.

Managing relations with data processors→For the sake of ensuring persons/agencies to whom data transferred for the reason of outsourcing provided security levels at least they ensure for their own data, Gülermak signs personal data transfer contracts with data processors; and via the said contract it is guaranteed the referred persons/agencies act in compliance with data processing purpose and scope and with personal data protection legislation, obeying personal data storage and disposal policy, data processor to be subject to confidentiality obligation, in case of any data violation in the said contract data processor to be obliged to immediately inform this situation to Gülermak.

b. Technical Actions

Establishing cyber security→Firewall, gateway patch management and software updates are used by Gülermak, it is regularly checked whether security actions taken for the systems are sufficient, it is periodically ensured to change passwords and codes, manager accounts and admin authority are only allowed when there is a need, access to relevant systems ensured by using user name and password, for employees dismissed from Gülermak, the account is deleted or entries are closed immediately, products such as anti-virus and anti-spam are used and updated, connections realized with secure methods while personal data from different web sites are supplied. In addition, powerful and unpredictable passwords and passwords have been created by Gülermak and the number of password entry attempts has been limited, access to systems containing personal data were restricted, access to systems containing personal data is restricted, and employees are granted access to the extent necessary for their work and tasks and their powers and obligations, unused software and services removed from devices, access authority and control matrix and a separate access policy and procedure was created.

Monitoring personal data security→Gülermak regularly checks security software messages, access control records and other reporting tools, and actions taken against alerts from these systems, in order to protect information systems against known vulnerabilities, vulnerability scans and infiltration tests are conducted regularly, assessments made in accordance with the test result for emerging security gaps, evidences collected for unwanted incidents such as information system crash, malicious software, discarding attacks, incomplete or incorrect data entry, violations of privacy and integrity, abuse of information system and stored in a secure manner.

Ensuring security of environments containing personal data→Actions taken by Gülermak for paper media, electronic media and devices owned by Gülermak, Personal data transmitted by e-mail or mail is sent with precautionary measures and documents such as paper documents, servers, backup devices, CDs, DVDs and USB devices containing personal data are kept in a lock when not taken to another room where additional security measures are used, entry-exit

records to the environment are kept, unauthorized access to said documents prevented, access control authorization and encoding methods used against situations such as loss or stealing of devices containing personal data; in this context, the password key is stored in an environment accessible only to authorized persons and unauthorized access is prevented, files encoded with full disc encryption, internationally recognized encoding programs are used. In addition to those, Gülermak has taken security measures to ensure that there is no breach of security when employees' personal electronic devices access the information system network, for personal data stored electronically, access between network components is restricted and the components are separated.

Supply, development and maintaining information technologies systems→Gülermak checks that the inputs of the application systems are correct and appropriate, data storage media in the devices removed and stored for ensuring security of personal data before dispatching for maintenance and repair works of devices sent to third institutions such as producer, dealer and service due to their malfunctions and expiry of service periods and only defected parts are dispatched and when a personnel out of company arrives for maintenance and repair purposes personal data are copied and required actions taken to prevent devices to lead out. In addition, control mechanisms are installed in the applications in order to check whether the information entered correctly into the system by Gülermak is corrupted.

Backup of personal data→Backed-up personal data can only be accessed by the system administrator, data set backups are excluded from the network and all backups are provided with physical security. Moreover, data backup strategies have been developed by Gülermak to provide personal data security against malware.

VI. TITLES, UNITS AND JOB DESCRIPTION OF THOSE INVOLVED IN PERSONAL DATA STORAGE AND DISPOSAL PROCESSES

Title	Unit	Job Description
Attorney	Law Unit	Responsible for storing and disposal process of personal data processed in all units
Finance Specialist	Finance Unit	Responsible for storing and disposal of personal data processed in finance unit
Accounting Director	Accounting Unit	Responsible for storing and disposal process of personal data processed in accounting unit
Senior IT Manager	Data Processing Unit	Responsible for storing and disposal process of personal data processed in IT unit.
Human Resources Director	Human Resources Unit	Responsible for storing and disposal process of personal

		data processed in human resources unit
Personnel and Administrative Affairs Manager	Personnel Unit	Responsible for storing and disposal process of personal data processed in personnel unit
Health Specialist	Infirmery Unit	Responsible for storing and disposal process of personal data processed in infirmery unit

VII. STORAGE AND DISPOSAL PERIODS

1. RELATED PERSON-FIRM REPRESENTATIVE: <i>Real Persons as Representatives of Companies with whom Gülermak is in Business Relationship</i>		
Data Category	Maximum Storage Period	Disposal Period
Identity Information	Until the connection between Gülermak and the firm or firm's representative	Within 6 months as of the expiry of the storage period
Contact Information	Until the connection between Gülermak and the firm or firm's representative	Within 6 months as of the expiry of the storage period

2. RELEVANT PERSON-SHAREHOLDER: <i>Real Persons as Holders of Gülerman Shares</i>		
Data Category	Maximum Storage Period	Disposal Period
Identity Information	Throughout the shareholding period	Within 6 months as of the expiry of the storage period

Contact Information	Throughout the shareholding period	Within 6 months as of the expiry of the storage period
Physical Venue Security Information	2 months	Spontaneous with the expiry of the storage period
Payment Information	Throughout the shareholding period	Within 6 months as of the expiry of the storage period

3. RELEVANT PERSON-JOB APPLICANT: *Real Persons Applying to be Employed in Any Position in Gülermak*

Data Category	Maximum Storage Period	Disposal Period
Identity Information	3 years	Within 6 months as of the expiry of the storage period
Contact Information	3 years	Within 6 months as of the expiry of the storage period
Professional Experience Information	3 years	Within 6 months as of the expiry of the storage period

4. RELEVANT PERSON-PERSONNEL: *Real Persons Employed in Gülermak with Labor Contract*

Data Category	Maximum Storage Period	Disposal Period
Identity Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period

Contact Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Personnel Affairs Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Physical Venue Security Information	2 months	Spontaneous with the expiry of the storage period
Professional Experience Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Health Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Conviction Security Precaution Information /	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Biometric Information	Until the termination of the labor contract	Spontaneous with the expiry of the storage period
Family Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Military Service Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Register Residence Information /	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period
Payment Information	10 years as of the termination of the labor contract	Within 6 months as of the expiry of the storage period

5. RELEVANT PERSON-SUBCONTRACTOR PERSONNEL: *Real Persons Employed in Firms with a Labor Contract Rendering Subcontracting Services to Gülermak*

Data Category	Maximum Storage Period	Disposal Period
Identity Information	10 years as of termination of the employment of the subcontractor firm personnel via subcontractor firm with Gülermak	Within 6 months as of the expiry of the storage period
Contact Information	10 years as of termination of the employment of the subcontractor firm personnel via subcontractor firm with Gülermak	Within 6 months as of the expiry of the storage period
Personnel Affairs Information	10 years as of termination of the employment of the subcontractor firm personnel via subcontractor firm with Gülermak	Within 6 months as of the expiry of the storage period
Physical Venue Security Information	2 months	Spontaneous with the expiry of the storage period
Health Information	10 years as of termination of the employment of the subcontractor firm personnel via subcontractor firm with Gülermak	Within 6 months as of the expiry of the storage period

6. RELEVANT PERSON-MEMBER OF BOARD OF DIRECTORS: *Real Persons as Members of Board of Directors of Gülermak*

Data Category	Maximum Storage Period	Disposal Period
Identity Information	As long as their office as a member of board of directors continues	Within 6 months as of the expiry of the storage period

Contact Information	As long as their office as a member of board of directors continues	Within 6 months as of the expiry of the storage period
Physical Venue Security Information	2 months	Spontaneous with the expiry of the storage period
Payment Information	As long as their office as a member of board of directors continues	Spontaneous with the expiry of the storage period

7. RELEVANT PERSON-VISITOR : *Real Persons Entering Gülermak Facilities for Visiting Purposes*

Data Category	Maximum Storage Period	Disposal Period
Identity-Relevant Firm Information	6 months	Within 6 months as of the expiry of the storage period
Vehicle Information	6 months	Within 6 months as of the expiry of the storage period

VIII. PERIODICAL DISPOSAL PERIODS

In accordance with Article 11 of Gülermak's Regulation he destroys personal data in June and December each year. Although the specified period is the widest range for disposal, disposal right in interim periods is reserved when necessary. Each disposal process is documented in minutes containing date information and maintained as an annex to this Personal Data Storage and Disposal Policy.