

## **BTM Raspa Boya Denizcilik San. ve Tic. A.Ş. (BTMboya)**

### **PERSONAL DATA**

#### **PROTECTION, STORAGE AND DELETION POLICY**

##### **1. OBJECTIVE**

The right of every individual to request the protection of personal data about himself is a right arising from the Constitution. As BTMboya, we consider fulfilling the requirements of this right as one of our most valuable duties. For this reason, we attach importance to the processing, protection, storage and destruction of your personal data in accordance with the law.

As a result of the importance we attach to personal data in this Policy, to determine the principles and procedures we apply while processing and protecting personal data, the personal data of our company employees, employee candidates, service providers, visitors and other third parties. The Constitution has been prepared in order to ensure that it is processed in accordance with international conventions, the Law on Protection of Personal Data No.6698 ("Law") and other relevant legislation, and that the relevant persons exercise their rights effectively.

##### **2. SCOPE**

Policy All personal data managed by BTMboya can be obtained, recorded, stored, preserved, changed, rearranged, disclosed, transferred, taken over, made available, by fully or partially automated or non-automatic means provided that it is a part of any data recording system. It covers all kinds of operations performed on data such as bringing, classifying or preventing their use.

The Policy relates to all personal data of BTMboya partners, officials, customers, employees, supplier officials and employees and third parties.

BTMboya may change the Policy in order to comply with the legislation and the decisions of the Personal Data Protection Board and to better protect personal data.

##### **3. DEFINITIONS**

<b>Abbreviation</b>	<b>Definition</b>
<b>Sending Group</b>	The category of legal persons to whom personal data is transferred by the data controller.
<b>Anonymization</b>	Consent on a specific subject, based on information and declared with free will.
<b>Related person</b>	The natural person whose personal data is processed.

<b>Related User</b>	Except for the person or unit responsible for the technical storage, protection and backup of the data, they are the persons who process personal data within the organization of the data controller or in line with the authority and instruction received from the data controller.
<b>Deletion</b>	Deletion, destruction or anonymization of personal data.
<b>Law / KVKK</b>	Personal Data Protection Law No. 6698.
<b>Data Saving System</b>	Any medium containing personal data that is fully or partially automated or processed in non-automatic ways, provided that it is part of any data recording system.
<b>Electronic Environment</b>	Environments in which personal data can be created, read, modified and written using electronic devices.
<b>Non-Electronic Environment</b>	Other than electronic environment, all written, printed, visual, etc. other environments.
<b>Personal Data</b>	Any information relating to an identified or identifiable person.
<b>Data Inventory</b>	Personal data processing activities carried out by data controllers depending on the business processes; Explain the purposes and the reason for processing personal data, the maximum retention period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security, which are formed by associating with the data category, the recipient group transferred and the data subject group. They detail the inventory.
<b>Personal Data Processing</b>	Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying personal data fully or partially automatically or by non-automatic means provided that they are part of any data recording system, or all kinds of operations performed on data, such as preventing their use.
<b>Committee</b>	The Personal Data Protection Committee established by BTMboya to manage the Policy and other related procedures and to ensure the enforcement of the Policy.
<b>Board</b>	Personal Data Protection Board.
<b>Institution</b>	Personal Data Protection Authority
<b>Special Qualified Personal Data</b>	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.
<b>Periodic Deletion</b>	The deletion, destruction or anonymization process specified in the personal data storage and disposal policy and to be carried out ex officio at repetitive intervals in the event that all the conditions for processing personal data included in the Law are eliminated.
<b>Policy</b>	Personal Data Protection, Storage and Deletion Policy

<b>Data Processor</b>	Person who processes personal data on behalf of the data controller based on the authority given by the data controller.
<b>Data Officer</b>	Real or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

#### 4. GENERAL PRINCIPLES

BTMboya audits the compliance of the data to be processed in the preparation phase of each new personal data processing workflow, with the following principles. Work flows that are not found suitable are not implemented.

While BTMboya processes personal data;

- (a)** Complies with the law and good faith.
- (b)** Ensure that personal data are accurate and, when necessary, up to date.
- (c)** It takes care that the purpose of the processing is specific, clear and legitimate.
- (d)** Checks that the processed data is linked for the purpose of processing, that it is processed to the extent that it should be processed, and that it is measured.
- (e)** It preserves the data only as much as required by the relevant legislation or for the purpose of processing, and destroys it when the purpose of processing is lost.

#### 5. DUTIES AND RESPONSIBILITIES

Personal Data Protection Committee has been established within BTMboya in order to manage this Policy and other related procedures regarding the processing of personal data and to ensure the enforcement of the Policy. The Committee consists of the General Manager, Deputy General Manager, Personnel and Administrative Affairs Officer, Accounting and Human Resources Officer. The duties and responsibilities of the Commission are as follows.

- (a)** It normally meets every 6 months. It may be collected extraordinarily if circumstances require it (for example in the event of a possible data breach).
- (b)** Discusses the issues that need to be changed / improved in the policy.
- (c)** Determine the issues that can be fulfilled for the legal processing and protection of personal data.
- (d)** The Commission determines the steps that can be taken to increase the awareness of KVKK within the company and before its business partners.
- (e)** Identifies the risks that may be encountered regarding the processing and protection of personal data and takes the necessary administrative and technical measures.

- (f) It maintains contact with the institution and manages the relations.
- (g) Evaluates the requests from the Related Person.
- (h) Follows periodic destruction processes.
- (i) It updates the Data Inventory.
- (j) Makes the assignments regarding the matters listed above.

**6. DATA SAVING SYSTEM**

Personal data are securely stored by our Company in the environments listed in the table below in accordance with the law.

<b>Electronic Environment</b>	<b>Non-Electronic Environment</b>
<ul style="list-style-type: none"> <li>• Servers (Domain, backup, e-mail, database, web, file sharing, etc.)</li> <li>• Software (office software)</li> <li>• Information security devices (security wall, intrusion detection and prevention, log file.)</li> <li>• Personal computers (Desktop, laptop)</li> <li>• Mobile devices (phone, tablet, etc.)</li> <li>• Removable sticks (USB, Memory Card etc.)</li> <li>• Printer, scanner, copier</li> <li>• Security camera</li> </ul>	<ul style="list-style-type: none"> <li>• Paper</li> <li>• Written, printed, visual media</li> </ul>

**7. EXPLANATIONS ON STORAGE AND DISPOSAL**

By BTMboya; Personal data belonging to the employees of third parties, institutions or organizations in relation to employees, employee candidates, visitors and customers are stored and destroyed in accordance with the Law. In this context, detailed explanations on storage and disposal are given below, respectively. 4.1 Explanations Regarding Storage, the concept of personal data processing has been defined in Article 3 of the Law, it is stated in Article 4 that the processed personal data should be related, limited and measured for the purpose of processing, and should be kept for the period stipulated in the relevant legislation or for the purpose for which they are processed. In the articles, the processing conditions of personal data are listed. Accordingly, within the framework of our company's activities, personal data are

stored for a period stipulated in the relevant legislation or in accordance with our processing purposes. According to this;

<b>Personal Data Source</b>	<b>Time</b>
<b>Accounting And Financial Transactions</b>	10 Year
<b>Cookies and Logs</b>	6 Months - Maximum 2 Years
<b>Personal Data Regarding Customers</b>	10 Years after the legal relationship ends.
<b>Contracts</b>	10 Years From Termination Of The Contract
<b>Human Resources Processes</b>	15 Years Since Termination Of Activity
<b>Data Stored within the Scope of Labor Law (For example, severance pay, notice indemnity, malpractice compensation, information that may be subject to compensation for violation of the principle of equal treatment, payroll records, annual leave days, etc.)</b>	5 years from the termination of the business relationship
<b>Data Regarding Personal File Provided Under Labor Law</b>	15 years from the termination of the business relationship
<b>Data That May Be Subject To Union Compensation From The Data Stored Under Labor Law (For example: Performance records, disciplinary penalties, termination documents etc.)</b>	10 years from the termination of the business relationship
<b>Data Collected within the Scope of Occupational Health and Safety Legislation (Ex: Employment health tests, health reports, OHS Trainings, Occupational Health and Safety activities records etc.)</b>	15 years from the termination of the business Relationship
<b>Data kept within the scope of SGK Legislation (Ex: Employment declarations, premium / service documents etc.)</b>	10 years from the termination of the business Relationship
<b>Pursuant to Labor Law: Responding to court / executive information requests regarding the employee</b>	10 years from the termination of the business Relationship
<b>Information on Company Partners and Board Members (For example: Attendance and Dividend Payments etc.)</b>	10 Year
<b>Information on Company Partners and Board Members (Personal data in the share book)</b>	Indefinite Due To The Obligation Of Keeping The Share Book
<b>Employee Advance Payment</b>	10 Year
<b>Commercial Books to be kept in Accordance with Company Activities, Documents Created Based on Records in Commercial Books, Financial Statements etc. Personal Data Processed</b>	10 Year
<b>Data Processed According to General Assembly Transactions</b>	10 Year
<b>Personal Data Regarding the Establishment and Content of Contracts to which the Company is a Party</b>	10 Year
<b>Personal Data Processed in Contractual Relations (Ex: Company Official, Name Surname, Signature Circular etc.)</b>	10 Years Following Termination Of The Contract
<b>Personal Data On Tax Records</b>	10 Year
<b>Personal Data Processed with Documents such as Invoice / Expense Compass / Receipt to be Kept in Accordance with the Tax Procedure Law</b>	10 Year
<b>Personal Data (Camera Records) Processed for Security Purposes by CCTV Cameras</b>	30 Day
<b>Records of Employees' Access to Media Containing Personal Data</b>	10 Years Due To Be Subject To Business Cases With At Least 2 Years

<b>Traffic Information Processed during the Use of the Company Internet Network, Internet Login and Remote Connection (Ex: IP address, start and end time of the service provided, etc.)</b>	2 Year
<b>Personal data from the Customer Information regarding the issuance of invoices that form the basis for commercial books and records in accordance with Article 82 of the TCC</b>	10 Year

Personal data collected; Carrying out the necessary works by our business units to make the relevant people benefit from the products and services offered by our company, customizing the products and services offered by our company according to the likes, usage habits and needs of the relevant persons, ensuring legal and commercial security (administrative operations for communication carried out by our company, ensuring physical security and supervision of company locations, business partner / customer / supplier - its authorized or employees - evaluation processes, reputation research processes, legal compliance process, audit, financial business, etc.), to determine and implement the commercial and business strategies of our company and to ensure the execution of the human resources policies of our company, to our business partners, suppliers, company officials, shareholders, legally authorized public institutions and legally authorized private individuals. organizations, in cases stipulated by the relevant legislation, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVK Law.

Personal Data is irreversibly deleted, destroyed and anonymized in accordance with the area where the data is stored, immediately and in any case, provided that it does not exceed 30 (thirty) days.

## **7.METHOD OF COLLECTING YOUR PERSONAL DATA, PURPOSE OF PROCESSING AND LEGAL REASON**

Within the scope of the commercial and / or contractual relationship between you and BTMboya, within the framework of the following purposes and in accordance with Article 5 of the Law numbered 6698; Your Personal Data within the scope of establishment and performance of the contract, fulfillment of legal obligations and legitimate interests; It can be collected and processed by BTMboya directly from you (such as contract, order form, offer form, e-mail correspondence, business card sharing, website messages and the shares of our other business partners). During your visits to our workplaces, your image is recorded by security cameras for security reasons and is processed limited to this operation.

In addition, your identity and contact data on your business cards can be processed by archiving them on your business cards (the data on the business card is deemed publicized) shared by you at various events attended by BTMboya or group companies. The aim here is to establish a commercial relationship between the two companies and to operate the processes required for corporate communication.

Your Personal Data is processed for the purposes stated below. In general for existing Business Relations;

- Execution of Goods / Service Sales Processes
- Execution of Goods / Service After Sales Support Services
- Execution of Goods / Service Production and Operation Processes
- Execution of Contract Processes
- Execution of Activities in Compliance with Legislation
- Finance and Accounting Transactions
- Ensuring Physical Space Security

- Follow-up and Execution of Legal Processes
- Communication Activities

- **In general for Potential Business Relationships;**

Your identity and contact information directly obtained from you through your visits to our website, or the business cards you share at events and fairs (the data on the business card is deemed publicized.); It is processed within the scope of legitimate interests in accordance with Article 5/2 of the Law for establishing a commercial or contractual relationship, managing your requests and complaints, and communication activities.

- **For Suppliers / Business Partners;**

Within the scope of the commercial relationship between you and our company, personal data belonging to your company officials and employees, specified in Article 5 of the Law; Establishment and execution of our contracts, fulfillment of legal obligations and legitimate interests of our company, in accordance with the basic principles stipulated in the Law and within the personal data processing conditions, within the scope of the following purposes.

- Execution of Goods / Service Purchase Processes
- Execution of Contract Processes
- Execution of Finance and Accounting Affairs
- Execution and Follow-up of Legal Processes
- Execution / Supervision of Business Activities
- Execution of Goods / Service Production and Operation Processes
- Ensuring Physical Space Security
- Conducting Communication Activities

- **For Visitors;**

Within the scope of your visits to our company, our website and other workplaces, in addition to ensuring the security of our company and you, as well as the fulfillment of our legal obligations and our legitimate interests, your visual data with security cameras in physical environments is obtained within the scope of internet access provided to you during your visit to our workplace. Your identity and communication data may be processed for the following purposes.

- Follow-up and Execution of Legal Affairs
- Ensuring Physical Space Security

- **For Employee Candidates;**

Our company provides personnel by using your personal data received by you through our website [www.btmboru.com.tr](http://www.btmboru.com.tr), from our e-mail addresses, by mail or within the scope of job applications you have made to our company headquarters or the application forms you have filled in, and stipulated in Article 5 of the Law for employment processes; It carries out data processing activities within the scope of the establishment and execution of our contracts and the legitimate interests of our Company for the following purposes.

- Application Process of Employed Candidates
- Conducting Internal Audit / Investigation / Intelligence Activities
- Ensuring Physical Space Security
- Conducting Communication Activities
- Planning of Human Resources Processes

- **For employees;**

BTMboya carries out data processing activities within the scope of the following purposes, within the scope of BTMboya management right and legitimate interest, to create a personal file for reasons arising from the relevant legislation, to conclude a service contract with you, to establish and protect your rights within the scope of the relationship. . In cases where explicit consent is required by law, process-based information and permission requests are also required.

- Execution of Information Security Processes
- Execution of Wage Policy
- Fulfilling Obligations Arising From Employment Contract And Legislation For Employees
- Conducting Internal Audit / Investigation / Intelligence Activities
- Execution of Finance and Accounting Affairs
- Following and Execution of Legal Affairs
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Conducting Occupational Health / Safety Activities

## **6. MEASURES TAKEN FOR DATA SECURITY**

BTMboya takes all necessary technical and administrative measures to prevent unlawful processing of personal data, to prevent unlawful access to personal data, and to ensure the appropriate level of security in order to protect personal data.

### **6.1. Technical Measures**

**(a)** Network security and application security are provided.

**(b)** Security measures within the scope of procurement, development and maintenance of information technology systems are taken.

**(c)** Current firewall systems are used.

**(d)** Necessary security measures are taken regarding the entry and exit to physical media containing personal data.

**(e)** The security of environments containing personal data is ensured.

**(f)** Personal data are backed up and the security of backed up personal data is also ensured.



- (g)** User account management and authorization control system is implemented and their follow-up is also carried out.
- (h)** Log records are kept without user intervention.
- (i)** Intrusion detection and prevention systems are used.
- (j)** Encryption is done.
- (k)** Secure encryption / cryptographic keys are used for private personal data and are managed by different units.
- (l)** The security of personal data stored in the cloud is ensured.

## **6.2. Administrative Measures**

- (a)** There are disciplinary regulations that include data security provisions for employees.
- (b)** Contracts signed contain data security provisions.
- (c)** Employees who have a change of position or leave their jobs are abolished.
- (d)** Confidentiality commitments are made.
- (e)** An authority matrix has been created for the employees.
- (f)** Employees who have a change of position or leave their jobs are abolished.
- (g)** Signed contracts contain data security provisions.
- (h)** Personal data security policies and procedures have been determined.
- (i)** Protocols and procedures for security of special quality personal data have been determined and implemented.
- (j)** Personal data are reduced as much as possible.
- (k)** Periodic and / or random inspections are carried out and made in-house.
- (l)** Protocols and procedures for security of special quality personal data are determined and implemented.

## **7. Rights of Related Person Regarding Personal Data**

The person concerned can make a request by applying BTMboya on the following issues:

- (a)** Learning whether their personal data is being processed,
- (b)** If personal data has been processed, to request information regarding this,
- (c)** Learning the purpose of processing personal data and whether they are used appropriately for their purpose,
- (d)** Learning about the third parties to whom their personal data has been transferred domestically or abroad,

**(e)** To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data have been transferred,

**(f)** To request the deletion, destruction or anonymization of personal data in the event that the reasons requiring its processing disappear, despite having been processed in accordance with the provisions of the KVKK and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom their personal data have been transferred,

**(g)** To object to the emergence of an unfavorable result by analyzing the processed data exclusively through automated systems,

**(h)** To demand the compensation of the damage in case of damage due to the processing of personal data illegally.

## **8. VIOLATION NOTIFICATIONS**

BTMboya employees report the work, action or phenomenon that they think violates the provisions of KVKK and / or the Policy to the Committee. The committee will convene after this violation notification, if it deems necessary, and prepare an action plan regarding the violation.

If the violation has occurred through the unlawful acquisition of personal data by others, the Committee notifies the relevant person and the Board within 72 hours within the scope of the Board's decision dated 24.01.2019 and numbered 2019/10.

## **9. CHANGES**

The changes on the policy are prepared by the Committee and submitted for the approval of BTMboya General Manager. The Updated Policy can be sent to employees via e-mail or posted on the website.

## **10. EFFECTIVE DATE**

This version of the Policy has been approved by the General Manager on 09/09/2020 and entered into force.

Best Regards.