1. PURPOSE OF PERSONAL DATA STORAGE AND DISPOSAL POLICY

The purpose of this Policy is to define roles and responsibilities and rules to be applied by our Company for the fulfillment of the obligations regarding the storage and disposal of Personal Data pursuant to the Regulation on the Deletion, Disposal or Anonymization of Personal Data (Regulation) published in the Official Gazette numbered 30224 on 28.10.2017, which was issued based on the Law No. 6698 on the Protection of Personal Data (Law).

2. SCOPE

This Personal Data Retention and Disposal Policy (Policy); covers the Personal Data and Personally Identifiable Personal Data defined by the Law, all Company employees, representatives, consultants, all affiliates, external service providers and all real and legal persons that the Company enters into a legal relationship.
Personal Data and Special Categories of Personal Data are referred to as “Personal Data” unless otherwise stated in the Policy.
The Policy will provide information about the Company’s retention activities on Personal Data, including its disposal activities and will be implemented in any disposal action process.
The custodial and disposal responsibilities and periods related to retention and disposal within the scope of the Policy are given in the supplementary tables at the end of the Policy.
This Policy is applied in conjunction with other Personal Data Protection and Privacy Policies implemented by the Company, and the Company’s Policies are complementary to each other. You can find the aforementioned Policies at the following address:

PDP Data Processing Policy:

http://www.metalyapi.com/Media/Default/Pdf/kvkk/Personal_Data_Protection_And_Processing_Policy.pdf

3. DEFINITIONS AND ABBREVIATIONS

3.1. Publicization: Data that has been publicly disclosed in any way by the relevant person.

3.2. Cloud Environment: Although not included within the Company’s structure, the media in which the internet-based systems that are encrypted with cryptographic methods are used and those in the use of the Company.

3.3. Firewall: With many different filtering features, it keeps the network’s traffic under control and security on the basis of incoming and outgoing packets.

3.4. Relevant Person: The real person whose Personal Data is processed.

3.5. Relevant User: Except for the person or unit responsible for the technical storage, protection, and backup of the data, the person who processes the Personal Data within the organization of the data controller or in accordance with the authority and instruction received from the data controller.

3.6. Darkening: Processes such as drawing, painting and icing the entire Personal Data so that it cannot be associated with a specific or identifiable real person.

3.7. Law: Law No. 6698 on the Protection of Personal Data.

3.8. Recording Media: Any medium in which Personal Data is processed in a completely or partially automated manner, or in a non-automated way, provided that it is part of any data recording system.

3.9. Personal Data: Any information relating to the real person who is identified or identifiable.

3.10. Processing of Personal Data: Obtaining Personal Data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system, saving, storing, changing, rearranging, explaining, transferring, data retrieval, all kinds of operations performed on the data, such as making the data available, classifying it or preventing it from being used.

3.11. Masking: The method of anonymizing Personal Data by extracting the basic determinant information from the data.

3.12. Printed Media: Media where data is printed on paper or microfilms.

3.13. Special Categories of Personal Data: Data about the race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costume and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures of individuals, biometric and genetic data of people.

3.14. Policy: This Personal Data storage and disposal Policy. 3.12. Matbu Ortamlar: Verilerin kâğıt ya da mikrofilmler üzerine basılarak tutulduğu ortamlardır.

3.15. Consolidation: A method of aggregating a lot of data and making Personal Data non-associative to a person.

3.16. Data Combining: A method of breaking the link between values and people by mixing the values within the Personal Data set.

3.17. Data Controller: A real or legal person who determines the purposes and methods of processing Personal Data and is responsible for the establishment and management of the data recording system.

3.18. Data Derivation: A method of creating more general content than the content of Personal Data and bringing Personal Data non-associative to any person.

3.19. Local optical, Digital or Magnetic Media: Other media such as hard or portable drives, optical drives, SSDs, magnetic tapes are included within the Company's structure.

3.20. Regulation: Regulation on the deletion, disposal or anonymity of Personal Data published on 28.10.2017 in the Official Gazette No. 30224.

4. RECORDING MEDIA

The Company declares and undertakes that the following recording media containing Personal Data, as well as any other recording media that may be used in addition, shall be covered by this Policy. The present basic recording media, not limited to those counted, are:
• Computers and servers registered in the name of the Company
• NAS

5. SITUATIONS REQUIRING THE STORAGE AND DISPOSAL OF PERSONAL DATA

5.1. Situations Requiring the Storage of Personal Data

Personal Data shall be stored in accordance with the legislation and for the purposes and reasons specified in the Personal Data Policies of the relevant Company.

5.2. Situations Requiring the Disposal of Personal Data

Except for the exceptions in the legislation, the instructions of the competent authorities and exceptions, Personal Data shall be deleted ex officio in accordance with this Policy at the request of the relevant person and / or due to the elimination of the data processing reasons listed in Articles 5 and 6 of the Law. The reasons listed are as follows:

- Clearly stipulated in the law.
- The person who is unable to disclose his consent due to actual impossibility or whose consent is not granted legal validity and obliged to protect his or another's life or body integrity.
- The processing of Personal Data belonging to the parties of the contract is necessary, provided that it is directly related to the establishment or execution of a contract.
- To be mandatory for the data responder to fulfill his legal obligation.
- Publicized by the relevant person.
- To be mandatory of Data processing for the establishment, use or protection of a right.
- To be mandatory of Data processing for the legitimate interests of the data responder, provided that it does not harm the fundamental rights and freedoms of the relevant person.

6. MEASURES TAKEN TO SECURE STORAGE OF PERSONAL DATA AND COMPLIANCE WITH LEGISLATION

Pursuant to Article 12 of the Law, the Company takes the necessary technical and administrative measures and performs the necessary audits to prevent unlawful processing of the Personal Data which is processing, to prevent unlawful access to the data and to take appropriate security measures for the storage of the data.
Personal Data is processed only within the scope of the procedures and principles set out in the law and other legislation.

The Company complies with the following principles when processing Personal Data:

- Not to use Personal Data for any purpose other than to perform the work expected from him within the limits set by the relevant Personal Data Policies, laws and related legislation.
- Processing Personal Data in accordance with the law and the rules of integrity, accurate and up-to-date when necessary, for specific, clear and legitimate purposes, in connection with the purpose for which they are processed, limited, restrained, and maintained for the duration necessary for the purpose for which they are processed.
- Immediate fulfillment of requests submitted by the Relevant Person under the law.

To prevent unlawful processing of Personal Data, the Company;

- Employs the specialized personnel in technical and legal fields,
- The technical measures are taken periodically inspected and reported to the relevant person,
- Awareness of the employees is created for the processing of Personal Data in accordance with the law and necessary administrative and technical measures are implemented through internal policies and training.

To prevent illegally access to Personal Data, the Company;

- Taking appropriate measures in accordance with the developments in technology and keeping the measures taken in technical and legal terms up to date,
- Limits the access powers and regularly reviews powers,
- All the measures taken are periodically inspected, reported to the authorized persons and solutions are provided with the most advanced techniques offered by technology in terms of the issues that pose risks,
- Uses software that includes virus protection systems and firewalls,
- It employs staff who specialize in technical issues and regularly tests applications to detect and close vulnerabilities,
- Informs employees that they cannot disclose the Personal Data they have learned to anyone in violation of the provisions of the law and they cannot use it and that these obligations will continue after their departure and with the except of proceeding purposes takes necessary commitments from the employees accordingly,
- In order to take appropriate measures for the storage of Personal Data, the Company,uses systems that provide the highest level of security and are suitable for technological developments,
- Employs staff specialized in technical issues,
- Takes technical security measures for storage areas and periodically inspects all measures taken and reports them to authorized persons and provides solutions with the most advanced techniques offered by the technology in terms of risk.
- It uses secured and multi-layer backup systems to ensure that Personal Data is stored in accordance with the law,
- All-access to the storage areas is recorded and instantly transmits improper access or access attempts to the relevant persons.
- It educates employees about how to secure the stored Personal Data.
- In addition, the contracts concluded by the Company with the persons to whom the Personal Data is transferred in accordance with the law include provisions that the persons to whom the Personal Data is transferred shall take the necessary security measures for the purpose of protecting the Personal Data and ensure compliance with these measures in their own organizations.

7. PROCEDURES AND PRINCIPLES OF DISPOSAL OF PERSONAL DATA

Disposal of Personal Data can take place in three different ways. These are the deletion, disposal or anonymity of Personal Data.

7.1. Deleting Personal Data

Deletion of Personal Data means that Personal Data cannot be accessed and reused in any way for the relevant users. After the reasons for processing of Personal Data processed in accordance with the provisions of the legislation have been eliminated, the Company will delete the Personal Data either ex officio or at the request of the relevant person. Personal Data stored in the cloud or in local optical, magnetic, or digital media are erased by digital commands so that they can never be recovered again. The relevant users can not access to the Data again which have been deleted in this way. Personal Data in printed media is erased by darkening method. Darkening is done by blackening Personal Data on the documents.

7.2. Disposal of Personal Data

Disposal of Personal Data is the retrieval of Personal Data that cannot be accessed, retrieved or reused by any person. After the reasons for processing Personal Data processed in accordance with the provisions of the legislation have been eliminated, the Company will physically destroy the recording media containing Personal Data in a manner that cannot be used afterward, either ex officio or at the request of the relevant person.The documents in the printed media are destroyed in such a way that they cannot be put back together with the document disposal machines.
In terms of Personal Data stored in local optical, magnetic or digital media, it is the process of physical destruction of optical, magnetic, or digital media, such as melting, burning, or pulverizing it. Data is rendered inaccessible by processes such as melting, burning, powdering or passing media through a metal grinder.

7.3. Making Personal Data Anonymous

Anonymizing of Personal Data is the making of Personal Data that, even if matched with other data, cannot be associated with a specific or identifiable real person. The Company uses masking, aggregation, data derivation, and data hash methods to anonymize Personal Data.

8. PERSONAL DATA STORAGE AND DISPOSAL PERIODS:

The legal storage periods of Personal Data are as follows:

PERSONAL DATA CATEGORY	MAXIMUM STORAGE PERIODS
Customer Informations	Pursuant to Article 82 of the Turkish Commercial Code, the information on the basis of issuing invoices that constitute the basis of commercial books and records is kept for a period of 10 years pursuant. to the aforementioned law article and the Customer Information other than that is kept for the period required for the purpose for which they are processed.
Personal Informations	• 5 years after the termination (end) of the service contract. • 10 years from the date of detection of the occupational accident or occupational disease, if any, during the service contract.
Personal Health Files Of Employees	According to Occupational Health and Safety legislation, personal health files should be kept for 2 years.
Candidate Employee Information	It is stored for up to 2 years until it is out of date.
Visitor Information	It is stored for 2 years.
Partner And Consultant Informations	It shall be kept for a period of 10 years in accordance with Article 146 of the Turkish Code of Obligations during and after its relationship with the Company.
Information Shared By Companies With The Company	It shall be kept for a period of 10 years in accordance with Article 146 of the Turkish Code of Obligations during and after its relationship with the Company.

Potential Customer Information	It is stored for 2 years.

If the statutory statute of limitations is set for a longer period of time-limiting, prescription period, storage period, etc.,the period elapsed in the legislation will be used instead of the maximum periods in the above table to prevent any loss of rights and to comply with the law.
In accordance with Article 11 of the Regulation, the Company has determined the period of destruction as 6 months. Accordingly, every year in the company periodic destruction is carried out in April and October.
If the relevant person requests the deletion or destruction of his or her Personal Data by applying to the Company in accordance with Article 13 of the Law, the Company deletes, anonymizes or destroys the Personal Data subject to the request within 30 days of receiving the request by explaining its justification by appropriate disposal method. For the Company to be deemed to have received the request, the relevant person must have made the request in accordance with the Company's policies. The Company will inform the relevant person about the transaction in any case. If all the conditions for processing Personal Data have not been abolished, this request may be rejected by the Company with a justification in accordance with the third paragraph of Article 13 of the Law and the rejection response shall be notified to the person in writing or electronically within 30 days at the latest.

TABLE - 1 NAMES AND RESPONSIBILITIES OF THOSE INVOLVED IN THE PROCESS OF STORING PERSONAL DATA

RESPONSIBLE	UNIT	TASK DESCRIPTION
Merve Yılmaz	Accounting	Responsible of Reporting

TABLE - 2 NAMES AND RESPONSIBILITIES OF THOSE INVOLVED IN THE DISPOSAL OF PERSONAL DATA

RESPONSIBLE	UNIT	TASK DESCRIPTION
Merve Yılmaz	Accounting	Responsible of Reporting