

ABDİ İBRAHİM FOUNDATION
PERSONAL DATA STORAGE AND DESTRUCTION POLICY

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ABDİ İBRAHİM FOUNDATION
PERSONAL DATA STORAGE AND DESTRUCTION POLICY

1. INTRODUCTION

The protection of personal data is of great importance for the Abdi İbrahim Foundation (as of this point, will be referred as "Foundation") and maximum sensitivity is shown in this regard. Accordingly, the processing of personal data in a manner consistent with the expectations of individuals and in accordance with the law is fundamental to our Foundation.

In this respect, our Foundation stores and destroys the personal data obtained during its activities in accordance with the general principles and regulations specified in this Personal Data Storage and Destruction Policy ("**Policy**"), which is prepared in accordance with the Constitution, the Law on the Protection of Personal Data No. 6698 ("**Law**"), the Regulation on the Deletion, Destruction or Anonymization of Personal Data ("**Regulation**") and other relevant legislation.

2. PURPOSE AND SCOPE OF THE POLICY

With this Policy, our Foundation aims to set out the general principles and principles of the Foundation regarding the storage and destruction of natural person data subject to personal data processing activities within the scope of the Law and to fulfill the obligations determined by the legislation regarding these issues.

This Policy covers all personal data subject to our Foundation's data processing activities under the Law. In addition, unless otherwise stated in this Policy, the documents referred to in this Policy include both hard and electronic copies.

3. DEFINITIONS

Unless the content of this Policy requires otherwise:

"Explicit Consent"	Consent on a specific issue, based on information and freely given,
"Buyer Group"	The category of natural or legal person to whom personal data is transferred by the data controller,
"Constitution"	Constitution of the Republic of Turkey,
"Related User"	Persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except for the person or unit responsible for the technical storage, protection and backup of the data,
"Extermination."	Deletion, destruction or anonymization of personal data,

"Recording Environment"	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"	Any information relating to an identified or identifiable natural person (e.g. name-surname, Turkish ID Number, e-mail, address, date of birth, credit card number, bank account number - <i>Therefore, the processing of information relating to legal persons is not covered by the Law</i>),
"Contact Person"	The natural person whose personal data is processed,
"Personal Data Processing"	Any operation performed on personal data such as obtaining, recording, storing, preserving, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system,
"Board"	Personal Data Protection Board,
"Special Qualified Personal Data"	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data,
"Periodic Extermination"	In the event that all of the conditions for processing personal data specified in the Law disappear, the deletion, destruction or anonymization process to be carried out ex officio at the recurring intervals specified in this Policy,
"Data Controller"	The person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data recording system)

means.

4. POLICY-REGULATED RECORDING ENVIRONMENTS

Our Foundation stores all personal data subject to data processing activities within the scope of the Law in the following environments where personal data processed by fully or partially automated or non-automated means, provided that they are part of any data recording system:

Our Foundation databases, third-party databases, email accounts, desktops and tablet computers, Foundation employees' devices (e.g. cell phones, tablets, etc.), backup areas, paper files, etc.

5. REASONS REQUIRING THE STORAGE AND DISPOSAL OF PERSONAL DATA

Our Foundation is based on the following principles in its personal data processing activities:

- compliance with the law and good faith,

- ensuring that personal data is accurate and, where necessary, up to date,
- processing for specific, explicit and legitimate purposes,
- being relevant, limited and proportionate to the purpose for which they are processed, and
- retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

stores and uses for the purposes of personal data processing set out in the relevant articles of [Abdi Ibrahim Foundation Personal Data Protection and Processing Policy](#) and in accordance with the conditions for processing personal data set out in Articles 5 and 6 of the Law set out below, and destroys personal data ex officio or upon the request of the person concerned in the event that all of these conditions disappear.

(a) Explicit Consent of the Relevant Person

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and free will.

(b) Explicitly Provided for in Law

The personal data of the data subject may be processed in accordance with the law without obtaining his/her explicit consent, if expressly provided for by law.

(c) Failure to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility

The personal data of the person concerned may be processed if it is mandatory to process the personal data of the person who is unable to disclose his consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect the life or physical integrity of himself or another person.

(d) Direct Relevance to the Formation or Performance of the Contract

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

(e) Legal Liability

If data processing is mandatory for our Foundation to fulfill its legal obligations, the personal data of the data subject may be processed.

(f) Publicization of Personal Data of the Data Subject

If the data subject has made his/her personal data public by himself/herself, the relevant personal data may be processed limited to the purpose of publication.

(g) Data Processing is Mandatory for the Establishment or Protection of a Right

Personal data of the data subject may be processed if data processing is mandatory for the establishment, exercise or protection of a right.

(h) Data Processing is Mandatory for the Legitimate Interest of our Foundation

Provided that it does not harm the fundamental rights and freedoms of the person concerned, the personal data of the person concerned may be processed if data processing is mandatory for the legitimate interests of our Foundation.

Accordingly, the basis of the personal data processing activity may be only one of the above-mentioned conditions, or more than one of these conditions may be the basis of the same personal data processing activity.

6. METHODS APPLIED FOR THE DESTRUCTION OF PERSONAL DATA AND TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN FOR THE DESTRUCTION OF PERSONAL DATA IN ACCORDANCE WITH THE LAW

Our Foundation deletes, destroys or anonymizes personal data by the following methods in the event that all of the conditions for processing personal data specified in Articles 5 and 6 of the Law disappear. Our Foundation exercises the utmost care in the destruction of personal data. In this context, our Foundation takes the necessary technical and administrative measures in accordance with the provisions of Article 12 of the Law and the Regulation, the general principles mentioned above, this Policy and the decisions of the Board, according to the technological possibilities and the cost of implementation regarding the following issues. All transactions carried out within the scope of destruction are recorded by our Foundation and such records are kept for at least three years, excluding other legal obligations. Unless otherwise decided by the Board, our Foundation chooses the appropriate method of ex officio deletion, destruction or anonymization of personal data according to technological possibilities and cost of implementation, and explains the reason for the appropriate method upon request of the person concerned.

(a) Methods of Deletion of Personal Data

Deletion of personal data is the process of making personal data inaccessible and non-reusable in any way for the relevant users. Our Foundation takes all necessary technical and administrative measures according to the technological possibilities and implementation cost in order to make the deleted personal data inaccessible and unusable for the relevant users.

(b) Methods of Destruction of Personal Data

Destruction of personal data is the process of making personal data inaccessible, unrecoverable and unusable by anyone in any way. Our Foundation takes all necessary technical and administrative measures for the destruction of personal data according to the technological possibilities and the cost of implementation.

(c) Methods of Anonymization of Personal Data

Anonymization of personal data means making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if the personal data is matched with other data. In order for personal data to be anonymized; personal data must be rendered impossible to be associated with an identified or identifiable natural person, even through the use of appropriate techniques in terms of the recording medium and the relevant field of activity, such as retrieval and matching of data with other data by our Foundation, recipients or recipient groups. Our Foundation takes all necessary technical and administrative measures for the anonymization of personal data according to the technological possibilities and the cost of implementation.

7. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN FOR THE SECURE STORAGE OF PERSONAL DATA AND THE PREVENTION OF UNLAWFUL PROCESSING AND ACCESS TO IT

Our Foundation pays the utmost attention and care for the secure storage of personal data and the prevention of unlawful processing and access, and takes the necessary technical and administrative measures in accordance with the provisions of Article 12 of the Law and the Regulation, the above-mentioned general principles, this Policy and the decisions of the Board, according to the technological possibilities and the cost of implementation regarding the following issues:

Technical Measures:

- a. Performs the necessary internal controls within the scope of the established systems.
- b. Carries out information technologies risk assessment and business impact analysis processes within the scope of established systems.
- c. Ensures that the technical infrastructure to prevent or monitor the leakage of data outside the organization is provided and the relevant matrices are created.
- d. It ensures the control of system vulnerabilities by receiving penetration testing services on a regular basis and when the need arises.
- e. Ensures that the access authorizations of employees working in information technology units to personal data are kept under control.
- f. Destruction of personal data is ensured in such a way that it cannot be recycled and leaves no audit trail.

Administrative Measures:

- a. Access to stored personal data within the Foundation is limited to the personnel who need to access it as per their job description. In limiting access, whether the data is of special nature and its degree of importance are also taken into consideration.
- b. In the event that the processed personal data is obtained by others through unlawful means, it shall notify the relevant person and the Board as soon as possible.
- c. Regarding the sharing of personal data, it signs a framework agreement on the protection of personal data and data security with the persons with whom personal data is shared, or ensures data security with the provisions added to the existing agreement.
- d. It employs personnel who are knowledgeable and experienced in the processing of personal data and provides the necessary training to its personnel within the scope of personal data protection legislation and data security.
- e. It shall conduct and have conducted the necessary audits to ensure the implementation of the provisions of the Law within its own legal entity. It eliminates the confidentiality and security weaknesses revealed as a result of the audits.

8. TITLES, DEPARTMENTS AND JOB DESCRIPTIONS OF THOSE INVOLVED IN PERSONAL DATA STORAGE AND DESTRUCTION PROCESSES

Our Foundation informs and trains the persons involved in the storage and destruction of personal data about the law on the protection of personal data and the processing of personal data in accordance with the law. In this context, employees of our Foundation and persons who learn personal data due to their duties store and destroy such

information in accordance with the provisions of the Law and other relevant legislation. This obligation continues after the relevant persons leave their duties.

In this context, the details regarding the persons involved in the storage and destruction processes of our Foundation are explained below:

Title	Unit	Mission
Chairman of the Board of Directors	Board of Directors	Management of the personal data destruction process in accordance with the periodic destruction period by ensuring compliance with the retention period of the processes within the scope of its duties.
Vice Chairman of the Board of Directors	Board of Directors	Management of the personal data destruction process in accordance with the periodic destruction period by ensuring compliance with the retention period of the processes within the scope of its duties.
Board Member	Board of Directors	Management of the personal data destruction process in accordance with the periodic destruction period by ensuring compliance with the retention period of the processes within the scope of its duties.

9. STORAGE AND DESTRUCTION PERIODS

Our Foundation stores and destroys personal data only for the period specified in the relevant legislation that it is obliged to comply with or for the period required for the purpose for which they are processed. In this context, our Foundation stores and destroys personal data for the maximum periods specified in the Annex-1 Retention and Destruction Periods Table below:

If the relevant person requests the destruction of his/her personal data by applying to our Foundation, our Foundation:

- (a) all the conditions for processing personal data have disappeared:
 - (i) finalize the request of the person concerned within thirty days at the latest and inform the person concerned; and

- (ii) If the personal data subject to the request has been transferred to third parties, it notifies this situation to the third party; ensures that the necessary actions are taken before the third party.
- (b) If all the conditions for processing personal data have not disappeared, it may reject the request of the data subject by explaining its reasoning in accordance with the third paragraph of Article 13 of the Law and notify the relevant person in writing or electronically within thirty days at the latest.

10. PERIODIC DESTRUCTION PERIODS

Our Foundation destroys personal data in the first periodic destruction process following the date when the obligation to destroy personal data arises. In this context, the personal data retention period of our Foundation is 10 (ten) years and the data that must be kept for certain periods within the scope of legal requirements are processed limited to the periods specified in the laws. In the event that the obligation to destroy personal data arises, the Foundation subjects personal data to destruction in periods of 6 (six) months. The aforementioned period does not exceed the maximum periodic destruction period specified in Article 11 of the Regulation in any case and under any circumstances.

11. ENFORCEMENT.

This Policy entered into force on 29.08.2024. The Policy may be updated from time to time in order to adapt to changing conditions and legislation. The updated Policy will enter into force on the date it is published on www.abdiibrahimvakfi.org.

In case of any conflict between this Policy and the provisions of the Law, Regulation and Abdi İbrahim Foundation Personal Data Protection and Processing Policy, the provisions of the Law, Regulation and Abdi İbrahim Foundation Personal Data Protection and Processing Policy shall prevail.

ANNEX - 1 Table of Retention and Destruction Periods

In the event that all of the conditions for processing personal data specified in the Law disappear, these data will be deleted, destroyed or anonymized ex officio within 6 (six) months at the latest from the disappearance of these conditions.

Annex - 2 Version Tracking Table

<u>VERSION TRACKING</u>		
TABLE		
Version No.	Updated Date	Amendment Explanation
v.1	29.08.2024	First Version

