**YARN DAY TEKSTİL SANAYİ VE TİCARET ANONİM ŞİRKETİ**

**PERSONEL DATA RETENTION AND DISPOSAL POLICY**

**10.10.2024**

1. **Introduction and Purpose of the Policy Preparation**
2. **Definitions**
3. **Scope**
4. **Fundamental Principles**
a) Personal data is processed in compliance with the law and the principle of good faith.
b) Personal data is stored accurately and updated when necessary.
c) Personal data is processed for specific, explicit, and legitimate purposes.
d) Personal data is processed in a way that is relevant, limited, and proportionate to the purpose for which it is processed.
e) Personal data is stored for as long as required by the relevant legislation or for the purpose for which they are processed.
5. **Record Storage Mediums**
6. **Reasons for Retention**
7. **Circumstances Requiring Disposal**
8. **Retention and Disposal Periods**
9. **Techniques Used for Disposal**
a) Deletion of Personal Data:
b) Destruction of Personal Data:
c) Anonymization of Personal Data:
i. Anonymization Methods that Do Not Disturb Data Irregularity
ii. Anonymization Methods that Disturb Data Irregularity
10. **Technical and Administrative Measures**
a) Administrative Measures
b) Technical Measures
11. **itles, Units, and Responsibilities**

1. **INTRODUCTION AND PURPOSE OF THE POLICY PREPARATION**

At **YARN DAY TEKSTİL SANAYİ VE TİCARET ANONİM ŞİRKETİ** ("Yarn Day" or "Company"), we pay utmost attention and care to the protection of personal data, ensuring that all our activities comply with the law regarding the protection of personal data. We take all necessary administrative and technical measures related to personal data processing activities carried out legally by us.

This **Personal Data Retention and Disposal Policy** ("Policy") has been prepared by **YARN DAY** as the data controller to fulfill our obligations under the **Personal Data Protection Law No. 6698** ("KVKK" or "Law"), the **Regulation on the Deletion, Destruction, or Anonymization of Personal Data** issued in the **Official Gazette** dated October 28, 2017, and effective from January 1, 2018 ("Regulation"). It aims to take the necessary technical and administrative measures mentioned above.

1. **DEFINITIONS**

For the implementation and interpretation of this Policy, the definitions stated below will be used. Concepts not defined in this Policy may be interpreted using the definitions found in the Law and relevant regulations.

|  |  |
| --- | --- |
| Kavram | Tanım |
| Explicit Consent | Consent given regarding a specific subject, based on being informed and freely expressed. |
| Recipient Group | The category of natural or legal persons to whom personal data is transferred by the data controller. |
| Relevant User | Individuals who process personal data within the organization of the data controller or under the authority and instruction of the data controller, excluding those responsible for the technical storage, protection, and backup of the data. |
| Destruction | The deletion, destruction, or anonymization of personal data. |
| Recording Medium | Any environment in which personal data processed automatically or non-automatically, as part of any data recording system, is stored. |
| Personal Data | Any information relating to an identified or identifiable natural person. |
| Personal Data Processing Inventory | The inventory created and detailed by the Company, associating personal data processing activities carried out in connection with its business processes, personal data, processing purposes, recipient groups to whom personal data is transferred, storage periods, transfers to foreign countries, and security measures taken concerning the personal data owner group. |
| Anonymization of Personal Data | The process of making personal data unable to be associated with an identified or identifiable natural person, even when matched with other data. |
| Processing of Personal Data | Any operation performed on personal data, whether by automatic or non-automatic means, including obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, taking over, making available, classifying, or preventing the use of data. |
| Deletion of Personal Data | The process of making personal data completely inaccessible and unusable for relevant users. |
| Destruction of Personal Data | The process of making personal data permanently inaccessible, irretrievable, and unusable by anyone. |
| Board | The Personal Data Protection Board |
| Policy | The policy relied upon by data controllers for determining the maximum retention period of personal data processed for a specific purpose and for deletion, destruction, and anonymization procedures. |
| Periodic Destruction | The process of deletion, destruction, or anonymization, performed automatically at recurring intervals specified in the personal data retention and destruction policy, when all the conditions for processing personal data in the law are no longer valid. |
| Registry (VERBIS) | The data controllers’ registry information system maintained by the Personal Data Protection Authority. |
| Data Recording System | A recording system in which personal data is processed by structuring it according to specific criteria. |
| Data Subject | The natural person whose personal data is processed. |
| Data Controller | The natural or legal person responsible for determining the purposes and means of processing personal data and for establishing and managing the data recording system. |

1. **Scope**

This Policy applies to all processes in which the Company, as the data controller, processes or manages personal data. All employees involved in these processes, as well as any third parties processing data on behalf of the Company, are required to adhere to the rules set out in this Policy. They are responsible for ensuring that personal data is processed lawfully, proportionately, and for legitimate purposes, as outlined in the Law.

1. **Basic Principles**

At **YARN DAY**, personal data is processed, stored, and destroyed in accordance with the following principles:

a) **Lawfulness and Fairness**: All personal data is processed in compliance with applicable laws and good faith principles. **YARN DAY** ensures that necessary administrative and technical measures are in place and closely monitors relevant legislation and the guidelines of the Personal Data Protection Authority (KVKK).

b) **Accuracy and Up-to-Date Data**: Data is sourced responsibly, and efforts are made to maintain the accuracy of personal data, updating it only when necessary.

c) **Specified, Explicit, and Legitimate Purposes**: **YARN DAY** processes personal data only for specified, clear, and legitimate purposes, regularly auditing these activities.

d) **Relevance and Proportionality**: Data is processed only to the extent necessary for the purpose.

e) **Retention Period**: Personal data is retained only for as long as required by law or the purpose for which it was collected. Once the legal basis for retaining the data no longer exists, it is anonymized, deleted, or destroyed.

 5. **Data Storage Media**

**YARN DAY** securely stores personal data in compliance with legal and data security standards in the following formats:

* Department cabinets
* Archives
* Network devices
* Laptops
* Mobile phones
	1. **Reasons for Data Retention**

The personal data collected by **YARN DAY** is retained for purposes including but not limited to:

* Conducting Employee Candidate / Intern / Student Selection and Placement Processes
* Fulfilling Obligations Arising from the Employment Contract and Legislation for Employees
* Managing Application Processes of Employee Candidates
* Managing Processes Related to Fringe Benefits and Interests for Employees
* Conducting Training Activities
* Managing Access Authorizations
* Conducting Occupational Health and Safety Activities, Training Activities
* Conducting Activities in Compliance with Legislation
* Managing Goods / Services Procurement Processes
* Conducting Emergency Management Processes
* Conducting / Auditing Business Activities
* Managing Communication Activities
* Planning Human Resources Processes
* Monitoring and Conducting Legal Affairs
* Conducting Internal Audit / Investigation / Intelligence Activities
* Managing Finance and Accounting Operations
* Monitoring and Conducting Legal Affairs
* Providing Information to Authorized Institutions and Organizations
* Conducting Management Activities
* Managing Goods / Services Sales Processes
* Managing Customer Relations Processes
* Conducting Goods / Services Production and Operation Processes
* Managing Organization and Event Activities
* Conducting Contract Processes
* Managing Logistics Activities
* Conducting / Auditing Business Activities
* Managing Storage and Archiving Activities
* Receiving and Evaluating Proposals for Improving Business Processes
* Managing Activities to Ensure Business Continuity
* Managing Firm / Product / Service Loyalty Processes
* Planning Human Resources Processes
* Tracking Requests / Complaints
* Conducting Product / Service Marketing Processes
* Managing Wage Policy
* Conducting Assignment Processes
* Managing Information Security Processes
* Conducting Audit / Ethical Activities

**7. CIRCUMSTANCES REQUIRING DELETION, DESTRUCTION, OR ANONYMIZATION**

YARN DAY retains personal data only as long as it is relevant to its purpose or within the period specified by the legislation. In this context, personal data is deleted, destroyed, or anonymized either ex officio or upon the request of the data subject.

The deletion, destruction, or anonymization of personal data by YARN DAY is carried out under the following circumstances:
a) The legitimate purpose for processing or retaining personal data no longer exists,

b) A change in the relevant legislative provisions that form the basis for the processing or retention of personal data mandates the deletion of personal data,

c) The conditions for processing personal data, as stipulated in Articles 5 and 6 of the Law, no longer exist,

d) In cases where personal data is processed solely based on explicit consent, the withdrawal of such consent by the data subject,

e) Acceptance of the data subject’s legitimate request for the deletion, destruction, or anonymization of personal data by the data controller,

f) A decision is issued by the Board for the deletion of personal data related to a specific data subject,

g) The maximum retention period for the personal data has been exceeded, and there is no condition justifying the continued retention of such data.

**8. RETENTION AND DELETION PERIODS**

The retention and deletion periods for personal data obtained by YARN DAY in accordance with the Law and other relevant legislative provisions are determined based on the following principles:

a) If the retention period for personal data is regulated by the relevant legislation or by a Board decision, this period will be followed.

b) If the retention period is not regulated by the relevant legislation or a Board decision, a retention period compatible with the purpose of processing the personal data and limited to the necessary duration will be determined in accordance with the above principles.

Personal data that has reached the end of its retention period and is due for deletion is destroyed during the periodic deletion processes, which are carried out every six months, in accordance with the methods specified in the Policy. All deletion, destruction, or anonymization activities are recorded and retained for at least 3 years.

**9. TECHNIQUES USED FOR DELETION, DESTRUCTION, OR ANONYMIZATION**

Personal data obtained and processed by YARN DAY in accordance with the Law and other relevant legislation is deleted, destroyed, or anonymized using the following methods when the retention period specified in the Policy expires or when the purposes for processing personal data, as stated in the Law and the Regulation, are no longer applicable. This is done either ex officio or upon the request of the data subject in accordance with the provisions of the Law and relevant legislation.

**Techniques for Deletion and Destruction of Personal Data:**

The principles and procedures for techniques used by YARN DAY for the deletion and destruction of personal data are outlined below. YARN DAY may choose an appropriate method to delete personal data. YARN DAY takes all necessary technical and administrative measures to ensure that deleted personal data is inaccessible and unusable for Relevant Users.

**a) Deletion of Personal Data:**
The following steps are taken when deleting personal data:

* Personal data subject to deletion is identified,
* Relevant Users with access to the personal data are determined,
* Access methods of the Relevant Users are identified,
* Data is deleted in such a way that it cannot be accessed again through the access methods of the Relevant Users.

**Deletion of data stored in software systems:** YARN DAY uses methods to delete personal data stored in digital environments in a manner that makes the data completely inaccessible and unusable for Relevant Users.
**Deletion of data stored in the cloud:** Personal data stored in the cloud is deleted by removing the relevant files and databases from the server where the cloud is hosted.

If the deletion of personal data would result in unintended consequences such as damage to other data not covered by this process or restriction of access to such data, the personal data is stored in an anonymized manner.

**Personal Data in Printed Form:** Personal data stored in printed documents is destroyed if the document is no longer necessary. This is done by shredding the document, burning it, or using services from companies operating in waste management or recycling. If it is necessary to retain the document for any reason, personal data on the document is masked with ink.

**b) Destruction of Personal Data:**

* **Overwriting:** Data is overwritten with random values of 0s and 1s at least eight times on magnetic media and rewritable optical media using specialized software, making it impossible to read or recover the old data.
* **Degaussing:** Magnetic media is exposed to high-intensity magnetic fields to render the data unreadable by disrupting it.
* **Physical Destruction:** Personal data on magnetic media that cannot be destroyed by degaussing can be destroyed by rendering the media completely unusable. Additionally, data stored in printed form can be destroyed in a manner that makes it unrecoverable (e.g., shredding).

**c) Anonymization of Personal Data:**
The principles and procedures for anonymization techniques applied by YARN DAY are outlined below:

**i. Anonymization Techniques that Do Not Create Data Inconsistency:**
These techniques involve changes made to the rows or columns of the entire dataset without changing or adding/removing any values, thereby ensuring anonymization through general changes to the dataset as a whole.

* **Variable Removal:** This method involves removing one or more variables entirely from the table. It is used when the variable is an important identifier that could identify the data subject, and no more suitable solution is available.
* **Record Removal:** In this method, records containing unique values that could allow identification of the data subject are removed from the dataset. For example, if there is only one lawyer in a company, instead of deleting the entire profession column, only the records related to that individual can be removed, ensuring anonymization of the remaining data.
* **Regional Masking:** The purpose of this method is to reduce predictability risks. If certain values for a specific record in a database are rare and identifiable, these values can be masked. For example, if a person with 5 children exists in a table with details of 10 employees’ age, gender, profession, and number of children, the value “unknown” can be used instead of “5” for that record to anonymize the data.
* **Generalization:** This method converts a specific value that identifies personal data into a more general value. For example, if a person with the national ID number 9876543210 answered “red” and “Istanbul” to the 1st and 3rd questions in a survey, generalization could be applied to show that a certain percentage of the respondents answered “red” to the 1st question and “Istanbul” to the 3rd question, ensuring anonymization.
* **Lower and Upper Limit Coding:** This method categorizes values within a predefined data group based on a variable. For example, categorizing parking subscribers based on whether their remaining subscription period is less than 1 year, between 1 and 3 years, or more than 3 years, ensures anonymization.
* **Sampling:** A subset of the data is disclosed instead of the entire dataset. This reduces the risk of making predictions about individuals, as it cannot be confirmed whether an individual known to be part of the larger dataset is included in the disclosed sample.
* **Global Coding:** This method is used for datasets that do not contain numeric values and where lower and upper limit coding is not applicable. It involves using a grouped data set for a value.

**ii. Anonymization Techniques that Create Data Inconsistency:**
In these methods, the values in the tables are altered to create inconsistencies in the values of the data set.

* **Micro-Aggregation:** All data is first ordered meaningfully and then divided into groups. The average value obtained by taking the average of the groups is written in place of the relevant data in the existing group to ensure anonymization.
* **Noise Addition:** In a data set where numerical values are predominant, adding deviations at a predetermined rate to the existing data can achieve anonymization.
* **Data Swapping:** Values of a selected variable are swapped between pairs of records within the stored data set to achieve anonymization.

In addition to the above methods, YARN DAY may use other techniques published or to be published by the Board in its guides.

# **TTITLES, UNITS and TASKS**

|  |  |  |  |
| --- | --- | --- | --- |
| **PERSONNEL** | **DEPARTMENT** | **ROLE** |  **RESPONSIBILITY**  |
| Durmuş Ali Yılmaz | Vıce-Chairman | Contact Person | Responsible for conducting notifications that need to be made via VERBİS (Data Controllers Registry Information System) and ensuring communication between YARN DAY and the Personal Data Protection Authority. |
| Erman Enes Yılmaz | Marketing | KVKK Unit Supervisor | Ensures physical documents containing personal data are stored in locked cabinets and keys are given to authorized personnel. Supports the Data Controller during the deletion or destruction of personal data. Verifies legal grounds for data processing, ensures transparency obligations are met, and obtains necessary consents from data subjects. Fulfills responsibilities listed in the company's Privacy and Personal Data Responsibility Commitment. |