PERSONAL DATA STORAGE, DELETE, DISPOSAL AND TRANSFER POLICY

Purpose of Personal Data Storage, Deletion, Destruction and Transfer Policy

The purpose of this Policy is ERALKAN GÜMRÜK MÜŞAVİRASYON LTD. STI. (hereinafter referred to as the Company) to make arrangements for updating, transferring, anonymizing, deleting and destroying personal data. The policy enters into force with the decision of the Board of Directors. The implementation of the policy is followed by the Personal Data Protection Committee appointed by the decision of the Board of Directors or by the Responsible appointed by it.

Personal Data Retention and Disposal Policy Preparation and Changes

The policy enters into force with the decision of the Company's Board of Directors. The implementation of the policy is followed by the Personal Data Protection Committee/Responsible, appointed by the decision of the Board of Directors. The Board of Directors may renew the Policy or make changes in the Policy, on its own initiative or upon the recommendation of the Committee/responsible.

Mediums Where Personal Data is Recorded

The Company preserves the personal data obtained within the scope of data processing activities carried out in accordance with the Law, provided that it is limited to the extent required by the purpose of processing. In this context, the personal data obtained are stored by the Company in physical and electronic media.

Legal, Technical and Other Reasons Requiring the Storage and Disposal of Personal Data

Personal data obtained directly or indirectly in accordance with the data processing conditions in the Law are kept by the Company in accordance with the law and honesty for the period stipulated by the relevant legislation or required by the purpose of processing.

The Company, within the scope of fulfilling its legal obligations arising from the Turkish Commercial Code No. 6102, the Labor Law No. 4857 and other relevant legislation, and the establishment, use or protection of its rights, which is one of the data processing conditions in the Law, retained during the statute of limitations. The company keeps the job applications made to it in the company systems until the applicants' request for deletion. From time to time, personnel needs are met from among the applications registered in the system.

In addition, the Company may store the personal data it obtains for the purpose of fulfilling the processing conditions in Articles 5 and 6 of the Law.

Personal data should be deleted if the reasons that require it to be kept in accordance with the general principles in Article 4 of the Law disappear. In addition, storage activities carried out based on the explicit consent of the data owner are terminated immediately if the consent is withdrawn by the data owner, and the relevant personal data should be deleted. In cases where the data owner has submitted a request for the deletion of his data to the Company within the scope of the rights set forth in Article 11 of the Law, the request is evaluated by the authorized persons within the Company and personal data is destroyed if all the data processing conditions specified in the Law are no longer valid.

Technical and Administrative Measures Taken for Safe Storage of Personal Data and Preventing Unlawful Processing and Access

The Company takes all kinds of technical and administrative measures in order to ensure the legal processing and security of personal data; In order to comply with these measures, the Company provides training to its personnel and conducts audits at periodic intervals.

The Company analyzes the personal data processing processes carried out by each department within its body, and takes the necessary actions to ensure compliance with the law in existing and added processes.

All stages of data collection in the company are reviewed one by one, and efforts are made to obtain the data in accordance with the law. Approval texts regarding these are also received while job applications are received, and those who come to the Company info@@eralkan.com.tr e-mail address are returned via e-mail, and the approval process for their applications is completed.

Company employees are informed not to disclose the personal data they have learned within the scope of their work to any third party and/or institution. Accordingly, confidentiality records are added to the service agreements between the Employee and the Company; A commitment is taken from the employees that these confidentiality obligations will continue after they leave their positions.

In addition, provisions are added to the agreements between the Company and the third parties and/or institutions to which it transfers personal data in accordance with Articles 8 and 9 of the Law, that the recipient group will take all kinds of measures to ensure the security of personal data.

The Company takes all kinds of technical measures within the framework of technological possibilities and costs in order to ensure the security of personal data in information systems. For example, firewall usage, real-time penetration tests, installation of security software on all devices.

ERALKAN GUMRUK CONSULTING LTD. STI.