

**POLICY
OF
PATARA TOURISM ESTABLISHMENT AND INVESTMENT CORPORATION
ON
PROTECTION AND DELETION OF PERSONAL DATA
(SUMMARISED TRANSLATION FROM TURKISH)**

1. INTRODUCTION

1.1. Purpose

Policy on Protection and Deletion of Personal data Policy “Politika” hereby covers Patara Tourism Establishments and Investment Cooperation (which will hereinafter be referred to as “Company”) in accordance with the prevailing Law.

In accordance with the relevant Law, Regulations on Deletion, Disposal and Anonymisation of Personal Data has been published in the Official Gazette on 28 October 2017. Objective of this Regulation is to ensure legally proper deletion, disposal and anonymisation of the personal data processed during management of the Company.

1.2. Coverage

This Policy covers following entities with whom our Company has legal contacts: personnel, acquaintances of personnel, applied personnel, acquaintances of applied personnel, share holder, employee/employer representatives, public officials, guarantors, potential goods or service receivers, interns, acquaintances of interns, providers, personnel or representative of providers, goods or service receivers, their acquaintances or representatives, parents, members of management committee and their visitors, third parties and personnel of third parties

1.3. Abbreviations and Descriptions

Term	Description
Receiver Group	Legal or real entity whose personal data has been processed
Direct Consent	Consent with freewill
Anonymisation	Disassociation with any other real entity
Electronic Media	Media where personal data could be processed, read, revised and printed through electronic equipment
Nonelectronic Media	Printed hard copies etc.
Relevant Person	Person whose personal data has been processed
Relevant Processor	Person who enters personal data under supervision.
Deletion	Deletion, disposal and anonymisation of personal data
Law	Law No. 6698 on Protection of Personal Data

Data Processing Media	All methods of data processing environment – partly automatic or non-automatic.
Personal Data	Data of real entity whose identification is certified
Person subject to personal data	Real entity whose personal data has been processed
Processing of personal data	All kinds of procedures related to personal data (processing, storage, archiving etc.)
Data processing inventory	Inventory of details related to processed personal data
Committee	Personal Data Processing Committee
Association	Association for Protection of Personal Data
Sensitive personal data	Personal data on race, ethnic roots, political views, philosophical approach, religion, clothing, membership to foundations or unions, health, sexuality, criminal or conviction issues etc.
Periodic deletion	Periodically repeated storage, deletion, disposal and anonymising of personal data in case conditions of data processing exists no more
Policy	Policy on which data processors base their transactions like period required for keeping the data, deletion, disposal and anonymising
Personal Record	Personal record kept by Protection of Personal Data Association
Data Processor	Real or legal entity who processes personal data under supervision of Data Processor Supervisor
Data Registration System	Recording system where data are classified according to certain criteria
Data Processor Supervisor	Real or legal entity who is responsible for processing,, establishment and management of the system
Regulations	Regulations on Deletion, Disposal or Anonymising of Personal Data published in the Official Gazette No. 30224 dated 28.10.2017

2. RESPONSIBILITY AND WORK DISTRIBUTION

All units of the Company and its personnel give their active support to the related branches in order for them to ensure proper and legal processing, and support them in technical and administrative matters.

Below please find the titles and job descriptions of personnel assigned in personal data protection and deletion processes.

Table 1 : Job Distribution for Protection and Deletion processes

Title	Unit	Job Description
Data Processing Supervisor	Data Processing	Supervision and control of personal data protection period, management of periodic deletion procedure and reply to requirements from persons whose data have been entered.
Accounting Supervisor	Accounting	Control and monitoring of accounting and account books in accordance with Law No. 6100 on TTK and Tax Legislation related to personal data protection, deletion and disposal.
Human Resources Supervisor	Human Resources	Ensuring proper protection of personal data of personnel, monitoring the proper periodic deletion as outlined in the Personnel Law.
Administrative. Legal Supervisor	Administration, Legislation	Ensuring legally proper protection, deletion and disposal periods
Procurement Supervisor	Procurement	Control and monitoring of legally proper protection, and disposal periods.
Marketing Supervisor	Marketing	Management of legally proper protection, deletion and disposal periods.
Vocational Safety and Health Supervisors (İSG)	Vocational Safety and Health	Control of legally proper protection, deletion and disposal periods.
Housekeeping, Front Office, Technical Unit, Food and Beverage Supervisors	Service, , Technical service and Food and Beverage service	Control of legally proper protection, deletion and disposal periods.

3. REGISTRATION ENVIRONMENT

Personal Data is protected in legally acceptable and secure environment as outlined in Table 2:

Table 2 – Environment where personal data is kept

Electronic Environments	Non- electronic Environments
<ul style="list-style-type: none"> Servers (storage, e-mail, data base, web, file sharing etc.) Programmes (Office programmes) Data Protection equipment (security warning, daily registration file, antivirus etc.) mobile instruments (telephone, Ipad, etc.) 	<ul style="list-style-type: none"> Paper Manual data registration systems Written, printed and visual media Binders Files

<ul style="list-style-type: none"> • Optical disks (CD, DVD, etc.) Removable memory cards (USB, Flash disk, memory cards, etc.) • Printers, scanners, photocopy machines • Desktop computers, lap tops 	
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4. EXPLANATIONS REGARDING PROTECTION AND DELETION

Company protects and deletes personal data in line with KVKK for the following entities: personnel, acquaintances of personnel, applied personnel, acquaintances of applied personnel, shareholders, representatives of employer/employees, public servants, potential goods and service receiver, interns, acquaintance of interns, suppliers, personnel of suppliers, representatives of suppliers, parents, members of management board and other third real and legal entities.

4.1. Explanations Regarding Protection

Personal data is kept for a certain period of time as outlined in Article 3 and Article 4 of the Law. Articles 5 and 6 of the subject Law outlines the rules of keeping the personal data.

Based on the above, personal data is kept for the purposes outlined in the legislation for a specified period stated in the law.

4.1.1 Legal Reasons of Protection by Law

Company, protects the personal data processed as long as required by the related legislation listed below:

- Tax Procedural Law. No. 213
- Identity Declaration Law No. 1774
- Labour Law No. 4857
- Social Security and Health Insurance Law No. 5510
- Law No. 5651 on Regulation of Publications on the Internet an Suppression of Crimes Committed by means of such Publications n
- Law of Obligations No. 6098
- Commercial Law No. 6102
- Vocational Safety and Health Law No. 6361
- Protection of Personal Data Law No. 6698

4.1.2. Reasons Necessitate Protection

Company protects personal data for following reasons within the framework of its operations:

- Management of Crisis Process
- Management of Information Security Process
- Management of Applied Personnel/Intern/Student Selection and Student Placement Process i
- Management of Employment Applications
- Legislative process regarding Contractual and Legislation issues for personnel si
- Management of Allowances and Benefits Procedures for Personnel
- Audit / Conduct of Ethical Activities
- Management of Training Activities
- Implementation of Activities by Law
- Management of Financial and Accounting Procedures
- Maintaining Physical Security of Residential Area
- Management of Assignment Procedures
- Management and Follow-up of Legal Issues
- Management of In-house Audit/ Investigation/Intelligence Activities
- Management of Communication Activities
- Planning of Human Resources Procedures
- Management of Work Activities /Audit
- Management of Occupational Safety and Health Activities i
- Management of Continuity of Work Activities
- Management of Accommodation Services
- Procurement of Goods/Services Activities
- Management of Sale of Goods /Services Activities
- Management of Marketing Analysis Studies
- Management of Performane Evaluation Procedures
- Management of Advertisement/Campaign/Promotion Activitie
- Monitoring of Risk Management Activities
- Management of Protecting and Archiving Activities
- Management of Contracgual Periods
- Management of Strategic Planning Activities
- Ensuring Security of Assets and Asset Sources
- Management of Suplly Chain Procedures
- Management of Wage Policy Ücret Politikasının Yürütülmesi
- Management of Marketing of Products/Services Ürün / Hizmetlerin Pazarlama Süreçlerinin Yürütülmesi
- Insuring Security of Data Processing Operationsi

- Providing information to Authorised Entities or Institutions
- Monitoring of Management Activities

4.2. Required Reasons for Deletion

Personal data is deleted by the Company if

- there is an amendment or cancellation of legislation requiring processing of personal data,
- reason of processing and protection of personal data is void,
- the person withdraws his/her direct consent
- his/her application for deletion as per Article 11 of KVKK is approved,
- the person involved applies to the Committee following Company's rejection of his/her application for deletion of personal data, due to his/her finding the reply insufficient or delayed (after the outlined period in KVKK) and in case this application is found to be appropriate by the Committee.
- the maximum period of protection of personal data exceeds the legal period and if there is no valid reason for further keeping of the data.

5. TECHNICAL AND ADMINISTRATIVE MEASURES

All technical and administrative measures are taken to ensure deletion and elimination of personal data properly by law as outlined in Article 12 and Item 4 of Article 6 of KVKK..

5.1. Technical Measures

Technical measures taken by the Company regarding the personal data are as follows;

- Procurement, development and maintenance of information technology systems..
- Usage of up-to-date anti-virus systems..
- Usage of Security warning systems..
- Tracing security of personal data..
- Back-up of personal data and security of the stored data.
- Application of Coding.

5.2. Administrative Measures

Administrative measures taken by Company regarding personal data are as follows:

- Confidentiality agreement is being made..
- Security measures are taken regarding entry to physical environments containing personal data..
- Security measures against external risks (fire, flood etc.) are taken in environments containing personal data etc.).
- Security is maintained in environments containing personal data..
- Number of personal data is being reduced as much as possible.

6. TECHNICAL METHODS OF DELETION OF PERSONAL DATA

Personal data are disposed by Company according to the related legislation

6.1. Deletion of Personal Data

Personal data are deleted in accordance with methods outlined in Table 3.

Table 3: Deletion of personal data

Data Registration Media	Description
Personal Data in physical environment	Personal data in physical media is deleted by closure method or storage in a secure place with no Access to related persons
Personal Data in servers	By the end of the storage period personal data in servers are deleted by eliminating Access of users.
Personal data in data bases	Usage of personal data by the related user is precluded by change of role or usage of leave.
Personal data in mobile equipment (USB, hard disc, CD, DVD,etc.)	Reaching of the related user to the file is prevented..

6.2. Disposal of Personal Data

As Company, following are the methods of disposal of personal data ::

Table 4: Disposal of Personal Data

Data Registration Environment	Description
Personal data in physical environment	Personal data on paper are disposed of by a paper shredder.
Personal data in exterior media (network equipment, flash based media, optical systems etc) and interior media	Equipment containing personal data are disposed of by burning, shredding and melting methods. Also such equipment is demagnetised so that the data is unreadable. Some software programmes which prevents retrieval of old data is also used.

6.3. Anonymising of Personal Data

Anonymising is making association of the personal data with another data impossible in spite of any mach with another personal data.

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7. BACK-UP AND DISPOSAL PERIODS

As to personal data base processed by Company:

- Personal data storage periods based on activities are in Personal Data Processing Inventory;
- Storage periods based on data categories are in VERBIS
- Storage periods based on processes are in this Data Base Storage and Disposal Policy. ır.

Table 5 : Storage and Disposal Periods based on Procedures

PROCEDURE	STORAGE PERIOD	DISPOSAL PERIOD
Management of human resources -	15 years starting from termination date	Within 6 months following the end of storage period
Management of personnel agreements	In case of rejection of employment 1 year starting from the date of application.	Within 6 months following the end of storage period
Management of Internship	10 years starting from termination of work	Within 6 months following the end of storage period.
Management of contractual periods	10 years starting from termination date of contract. I	Within 6 months following the end of storage period.
Camera recordings	30 days following the recording date	Automatically deleted after recording period.
Management of accounting and financial issues	10 years following recording	Within 6 months following the end of storage period
Management of Procurement and Sales	10 years following the termination of contract	Within 6 months following the end of storage period.
Management of vocational safety and health	15 years starting from termination date of work	Within 6 months following the end of storage period.
Management of accommodation periods	10 years following registration	Within 6 months following the end of storage period.

By the end of the storage period of personal data , deletion, disposal and anonymising procedures will be taken over by “2nd RESPONSIBLE AND WORK DISTRIBUTION” departments.

8. PERIODIC DISPOSAL PERIODS 8. PERİYODİK İMHA SÜRESİ

According to Article 11 of the Regulations each year in June and December Company is materialising disposal process.

9. PUBLICATION AND PROTECTION OF THE POLICY 9. POLİTİKA’NIN YAYIMLANMASI VE SAKLANMASI

Policy is published as signed hard copy and is also published on the Internet web site. Hard copies are kept in Human Resources Department files.

10. UPDATING PERIOD OF POLICY

Policy is updated when and as needed.

This Policy is hereby in force and will become valid upon publication on web site.

If this Policy is abolished the signed hard copies will be cancelled by certifying stamp or signature with the notation “Cancelled” and will be kept in the Human Resources Unit at least for 5 years..