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PERSONAL DATA STORAGE AND DISPOSAL POLICY

1. PURPOSE

The purpose of the Personal Data Disposal Policy ("Policy") is to determine the principles regarding the disposal of personal data belonging to Labiance Uluslararası Turizm ve Organizasyon A.Ş.'s ("LaBiance Turizm A.Ş.") existing and potential customers, business partners, visitors, shareholders, company managers, employee candidates, employees and officials of the institution in cooperation and related third parties, Article 20 of the Constitution of the Republic of Turkey, the Personal Data Protection Law No. 6698 ("Law"), the Deletion, Disposal or Anonymization of Personal Data dated 28.10.2017 and numbered 30224." article of the Constitution of the Republic of Turkey, the Law No. 6698 on the Protection of Personal Data ("Law"), the Regulation on the Deletion, Disposal or Anonymization of Personal Data dated 28.10.2017 and numbered 30224 ("Regulation") and the relevant legislation and to determine the necessary disposal procedures and systems in this direction.

2. DEFINITIONS

Within the scope of this Policy;

Recipient group: The category of natural or legal person to whom personal data is transferred by the data controller,

Relevant 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,

Disposal: Deletion, disposal or anonymization of personal data,

Law: Law on the Protection of Personal Data dated 24/3/2016 and numbered 6698,

Recording medium: 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 processing inventory: The inventory that data controllers create by associating the personal data processing activities they carry out depending on their business processes with the personal data processing purposes and legal grounds, data category, transferred recipient group and data subject group, and detailing the maximum retention period required for the purposes for which personal data are processed, personal data foreseen to be transferred to foreign countries and the measures taken regarding data security,

Board: Personal Data Protection Board,

Periodic disposal: The process of deletion, disposal or anonymization to be carried out ex officio at recurring intervals specified in the personal data storage and disposal policy in the event that all of the conditions for processing personal data specified in the Law disappear,

Registry: The registry of data controllers kept by the Personal Data Protection Authority,

Data recording system: The recording system in which personal data are structured and processed according to certain criteria,

Data Controller: The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

3. FOR STORAGE AND DISPOSAL OF PERSONAL DATA

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Within the framework of the Law and other relevant legislation; personal data of customers, employees and other third parties are processed, stored and destroyed for legal, technical and other reasons.

General personal data such as identity and contact information, payment data, signature data, visual data, digital trace data in case of visiting the website or joining the common internet network by the relevant users, and your personal data of special nature such as health data, provided that your explicit consent is obtained, to create your records, to provide our service, to record your requests and complaints, to respond and manage them through various channels, to customize and improve the service offered, to provide general and special offers to customers provided that there is explicit consent, to carry out promotional, advertising, campaign, campaign, lottery, promotion, information, communication activities, It is processed, stored and destroyed limited to the purposes and reasons of conducting satisfaction surveys in order to improve our services, organization and event management, ensuring information and data security and ensuring the continuity of information systems, keeping your log records in electronic environment in accordance with Law No. 5651, making the necessary notifications to official institutions and organizations, ensuring the security of the institution, carrying out company review, investigation, reporting, internal control and audit activities and carrying out and improving services within the scope of company activities, ensuring compliance with the legislation and company policies and procedures of company activities.

Personal data of employees and employee candidates (identity data, communication data, visual data, personal data, training data, signature data, vehicle license plate data, digital trace data, etc.) and personal data of special nature (health data; criminal record, biometric data, association/foundation memberships, etc.) with your explicit consent. other shared data, execution of the employment contract, performance evaluation and provision of fringe benefits and rights, execution of training, orientation and emergency drill processes, fulfillment of obligations arising from the legislation, including the creation of the personnel file, provision of health services by the workplace physician with the entrance examination and periodic examination, fulfillment of obligations related to occupational health and safety, execution of event, travel, visa and organization processes, taking camera recordings to ensure workplace security, tracking entrances and exits, keeping log records in electronic environment in accordance with Law No. 5651, Processing and publishing visual data in case of video or photo shooting at the workplace in order to create promotional visuals of our company, carrying out company review, investigation, reporting, internal control and audit activities, storing and using e-mail archives and desktop files in order to ensure business continuity in case of termination of employment, It is processed, stored and destroyed limited to the purposes and reasons of fulfilling the requests of public institutions and organizations and making notifications, ensuring data and information security, managing access authorizations, providing, executing, developing services, meeting requests and responses, ensuring compliance with relevant legislation, policies and procedures.

4. DELETION OF PERSONAL DATA

The process followed in the deletion of personal data is carried out by determining the personal data that will be subject to deletion, identifying the relevant users for each personal data using the access authorization and control matrix, determining the authorities and methods of the relevant users such as access, retrieval and reuse, closing and eliminating the access,

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retrieval and reuse authorities and methods of the relevant users within the scope of personal data.

Personal data on paper media are erased using the blackout method. The blackout process is performed by cutting out the personal data on the relevant document, where possible, and making it invisible to the relevant users by using fixed ink in a way that cannot be reversed and cannot be read by technological solutions.

The files on the central server are deleted with the delete command in the operating system or the access rights of the relevant user are removed on the directory where the file or file is located.

In the databases used, the relevant rows containing personal data are deleted by database commands.

5. METHODS OF DISPOSAL OF PERSONAL DATA

When the retention periods determined by law or by the data controller expire, personal data are destroyed by the relevant user using demagnetization, physical disposal and overwriting methods.

6. 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. By anonymization; personal data is rendered unrelated to 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 the return of personal data by the data controller or recipient groups and / or matching the data with other data.

7. METHODS OF ANONYMIZATION OF PERSONAL DATA

Anonymization is the removal or modification of all direct or indirect identifiers in a dataset, preventing the identification of the person concerned or losing the ability to be distinguishable in a group/crowd in such a way that it cannot be associated with a natural person. As a result of the prevention or loss of these features, data that do not point to a specific person are considered anonymized data.

All of the disconnection processes carried out by methods such as automatic or non-automatic grouping, masking, derivation, generalization, randomization applied to the records in the data recording system where personal data is kept are called anonymization methods.

The methods in the table below are used for anonymization:

Anonymization Methods that Do Not Provide Value Irregularity	<ol style="list-style-type: none">1. Extracting Variables2. Extracting Records
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	<ol style="list-style-type: none"> 3. Regional Cloaking 4. Generalization 5. Lower and Upper Limit Coding 6. Global Coding 7. Sampling
Anonymization Methods Providing Value Irregularity	<ol style="list-style-type: none"> 2. Micro Joining 3. Data Exchange

Personal data; The nature, size, nature of the physical media, diversity, the benefit to be provided and the purpose of processing, the frequency of processing, the reliability of the party to which it will be transferred, the meaningfulness of the effort to be made to anonymize it, the magnitude of the damage that may arise if its anonymity is disrupted, the impact area, Anonymization is provided for each personal data group by using the appropriate methods mentioned above, taking into account the possibility that the effort it will take to design and implement an attack that will disrupt anonymity is meaningful, considering the distribution/centrality ratio, the criteria for users' access authorization control to the relevant data, and the possibility that the effort it will take to implement an attack that will disrupt anonymity is meaningful.

8. STORAGE MEDIA FOR PERSONAL DATA

Personal data collected by LaBiance Turizm A.Ş. are securely stored in accordance with the law in the recording media specified in the table below.

Electronic Recording Media	Non-Electronic Recording Media
<ol style="list-style-type: none"> 3. Servers (domain, backup, e-mail, database, web, file sharing, etc.) Software (office software, portal, EBYS, VERBIS.) 4. Information security devices (firewall, intrusion detection and prevention, log file, antivirus, etc.) 5. Personal computers 6. Mobile devices (phones, tablets, etc.) 7. Optical disks (CD, DVD, etc.) 	<ul style="list-style-type: none"> • Paper • Manual data recording systems (survey forms, visitor logbook) • Written, printed, visual media



8. Removable memories (USB, Memory Card, etc.)	
9. Printer, scanner, copier	

10. DISTRIBUTION OF RESPONSIBILITIES AND TASKS

All units and employees of LaBiance Turizm A.Ş. actively support the responsible units in taking technical and administrative measures to ensure data security in all environments where personal data is processed in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to ensure that personal data is stored in accordance with the law by properly implementing the technical and administrative measures taken by the responsible units within the scope of the Policy, training and raising awareness of the unit employees, monitoring and continuous supervision.

The titles, units and job descriptions of those involved in the storage and disposal of personal data are given in the table below.

TITLE	UNIT	TASK
Data Controller	LaBiance Tourism Inc. Administration	Responsible for ensuring that employees act in accordance with the policy. Responsible for the preparation, development, execution, publication in relevant media and updating of the Policy.
Assistant person	LaBiance Turizm A.S. IT team	Responsible for providing technical solutions needed for the implementation of the Policy.
Related user	LaBiance Turizm A.S. Departments/employees	Responsible for the execution of the Policy in accordance with their duties.

11. STORAGE AND DISPOSAL PERIODS OF PERSONAL DATA

As LaBiance Turizm A.Ş.; Personal data-based retention periods for all personal data within the scope of activities carried out depending on the processes are included in the Personal Data Processing Inventory, and process-based retention periods are included in the Personal Data Retention and Disposal Policy.

All transactions regarding the deletion, disposal and anonymization of personal data are recorded and such records are kept for at least 3 years, excluding other legal obligations.

PROCESS	STORAGE TIME	DISPOSAL PERIOD
Personal data of prospective employees	1 year from job application	
Data stored under the Labor Law	10 years from the termination of the employment relationship	



Data collected under occupational health and safety legislation	15 years from the termination of the employment relationship	At the first periodic disposal following the end of the storage period
Data kept within the scope of SSI legislation	10 years from the termination of the employment relationship	
Data collected pursuant to other relevant legislation	For the period stipulated in the relevant legislation	
If the relevant personal data is subject to a crime within the scope of the Turkish Penal Code or other criminal legislation	During the statute of limitations	
Personal data of customers	Pursuant to Article 82 of the TCC (TKK), the information on the basis of which the invoices that constitute the basis of the commercial books are prepared shall be kept for 10 years pursuant to the aforementioned article, and the Customer Information other than this shall be kept for a maximum of 3 years.	At the first periodic disposal following the end of the storage period
Log records	10 years	
Camera recordings	6 months	
Information Shared with the Company by Companies	10 years during and after the termination of the relationship with the Company in accordance with Article 146 of the TCO (TBK)	
Telephone records of potential customers	2 years from the interview	

12. PERIODIC DISPOSAL PERIOD AND DISPOSAL RECORDS

According to the Regulation, periodic disposal is carried out every 6 months. Accordingly, periodic disposal is carried out in June and December every year. Personal data for which the prescribed retention period has expired shall be deleted, destroyed or anonymized by the data controller in the first periodic disposal process following the date on which the obligation to delete, destroy or anonymize arises.

In the event that personal data is destroyed using various methods, a record of which personal data is destroyed, by whom, when and how, is kept and signed by the person who performs the disposal. Disposal minutes are kept for 3 years.

13. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN

Technical and administrative measures have been taken to ensure the secure storage and disposal of personal data and to prevent unlawful processing and access.

13.1. Administrative Measures

- "Personal Data Processing Inventory" has been prepared.





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- Corporate policies, particularly "Personal Data Protection Policy", "Employee Information, Undertaking and Electronic Mail Usage Policy" and "Personal Data Storage and Disposal Policy" have been prepared.
- Additional protocols regarding compliance with the LPPD were signed to the contracts made with the data controller and third parties who process data.
- Separate confidentiality agreements have been concluded with employees who process special categories of data and employees who process general categories of data.
- Internal periodic/random audits and risk analyses are conducted.
- Additional provisions regarding KVKK compliance have been added to existing employment contracts.
- Trainings and awareness-raising meetings on KVKK and information security were organized.

13.2. Technical Measures

Authorization Matrix is prepared and Authorization Control is ensured. Access Logs and Log Records are kept. Encryption is used. With User Account Management, the operations of each relevant user can be identified. Application and Network Security is ensured through periodic Penetration Tests, Data Loss Prevention Software, Firewalls and up-to-date Anti-Virus Systems. Security of personal data is ensured through Intrusion Detection and Prevention Systems, data masking and backup.

14. RIGHTS OF THE PERSON CONCERNED

Within the framework of the personal data protection legislation, it has the right to request the deletion or disposal of the relevant personal data, to request correction of your personal data in case of incomplete or incorrect processing, or to request notification of the transactions regarding the deletion or disposal of personal data to third parties to whom personal data is transferred.

Within the scope of the Law, data subjects may submit their applications regarding their personal data via the form at the link <https://www.labiance.com/> by using one of the following channels;

- "Kızılırmak Mahallesi, 1443. Cadde, 1071 Usta Plaza B Blok, Floor 18, Interior Door No: 131, Çankaya, Ankara, Turkey" in person by confirming your identity; or
- Our company's info@LaBiance.com mail address; or
- Our Company with your secure electronic or mobile signature <https://www.labiance.com/> or

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- By ensuring that your identity is confirmed, it can be forwarded to the data controller by other procedures specified in the Law and the relevant legislation.

In accordance with Article 13 of the Law, the data controller will finalize the application requests according to the nature of the request and within 30 (thirty) days at the latest. If the transaction requires cost, the tariff determined by the Personal Data Protection Board will be applied.

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