POL.14 · KVKK

Personal Data Retention and Destruction Policy

English translation for information. In case of discrepancy the Turkish text prevails (Türkçe metin esastır).

1 Purpose

This policy sets out the principles and practices of TURKEYSMS BİLİŞİM VE İLETİŞİM HİZMETLERİ TİCARET LİMİTED ŞİRKETİ (the "Company") for the retention and destruction of personal data.

2 Scope

This policy covers personal data processed in all of the Company's activities.

3 Core Principles

In retaining and destroying personal data, the Company complies with the following principles:

Lawfulness and fairness
Personal data is retained and destroyed lawfully and in good faith.

Time limit
Personal data is retained only for as long as necessary for the purpose for which it is processed.

Confidentiality
Personal data is handled in line with the principle of confidentiality during retention and destruction.

Security
Personal data is protected by security measures during retention and destruction.

4 Retention of Personal Data

The Company retains personal data for as long as necessary for the purpose for which it is processed. The retention period is determined according to the applicable legislation and the nature of the data.

Personal data category	Maximum retention period
Identity, Contact, Customer Transaction, Finance	10 years
Personnel, Legal Transaction, Transaction Security, Physical Premises Security	5 years

These are the maximum retention periods declared to the Data Controllers Registry (VERBİS). When a period ends, or the processing purpose ends earlier, the data is destroyed by the methods set out in this policy.

When retaining personal data, the Company ensures that:

- personal data is accessible only to authorised persons,
- personal data is protected against unauthorised access, use, disclosure, alteration or destruction,
- personal data is secured through technical and administrative measures.

5 Destruction of Personal Data

The Company destroys personal data in accordance with the applicable legislation once the reasons requiring its processing no longer exist. Destruction is carried out by the following methods:

Deletion
Personal data in electronic media is made inaccessible and unusable in any way for the users concerned.

Physical destruction
Where physical destruction is appropriate, the personal data is destroyed physically.

Anonymisation
Using suitable techniques, personal data is rendered impossible to associate with an identified or identifiable person, even when matched with other data.

When destroying personal data, the Company ensures that:

- destruction is carried out only by authorised persons,
- personal data remains protected against unauthorised access, use, disclosure or alteration until destruction is complete,
- destruction is secured through technical and administrative measures.

6 Amendments

The Company may amend this policy when necessary. Amendments are announced to the persons concerned by publication on the Company's website.

APPROVED BY
TURKEYSMS BİLİŞİM VE İLETİŞİM HİZMETLERİ TİCARET LİMİTED ŞİRKETİ
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