

# Personal Data Retention and Disposal Policy

## 1. PURPOSE

The purpose of this policy is to define the fundamental information security principles of vMind and to express the support given by senior management to these principles.

## 2. RESPONSIBLE PARTIES

All users within vMind are responsible for the implementation of this policy.

## 3. IMPLEMENTATION AND DETAILS

VMiND Information Technologies Ltd. ("VMiND") is committed to complying with the regulations on the protection, processing, and disposal of personal data. This Personal Data Retention and Disposal Policy ("Policy") has been prepared within the scope of the Law on the Protection of Personal Data No. 6698 ("KVKK or the Law") and the Regulation on the Deletion, Destruction or Anonymization of Personal Data ("Regulation"), and contains the framework and principles of the required regulations and the procedures related to disposal operations. The purpose of this Policy is to determine the procedures and principles regarding the maximum retention period required for personal data processed by VMiND within the scope of the relevant Law and Regulation in accordance with the purpose for which they are processed, and the operations related to the deletion, destruction and anonymization of such data.

This Policy concerns the personal data of individuals whose personal data are processed by VMiND through wholly or partly automatic means or non-automatic means provided that they form part of a data recording system, and the retention and disposal of such data.

VMiND processes personal data only when the processing conditions set out in Article 5/1 or Article 5/2 of the KVKK are present, and retains them for as long as necessary. The purposes of processing include: management of information security processes, management of job applicant processes, management of job applicant application processes, fulfilment of obligations arising from employment contracts and legislation for employees, management of fringe benefits and benefits processes for employees, conducting activities in compliance with legislation, conducting business activities, conducting goods/service sales processes, conducting financial and accounting operations, conducting communication activities, planning human resources processes, conducting activities for customer satisfaction, conducting advertising/campaign/promotion processes.

While personal data is being processed by VMiND in accordance with the KVKK and relevant legislation, the disposal of personal data is required in the following cases: expiry of the periods related to personal data, cessation of the purpose of personal data processing, amendment or repeal of the relevant legislative provisions that constitute the basis for the processing and retention of personal data, withdrawal of consent by the data subject in cases where processing is based on explicit consent, and acceptance of the data subject's request for the deletion or destruction of

personal data submitted to VMİND within the framework of the right under Article 11 of the Law.

VMİND takes technical and administrative measures to ensure the secure storage of personal data it processes and to prevent unlawful processing and access, acts in accordance with Board decisions, provides awareness training to its employees, and ensures appropriate security levels for the secure storage of personal data.

As also regulated in the relevant Law and Regulation, VMİND fulfils its obligations regarding the deletion or destruction of personal data ex officio or upon the request of the data subject when the purpose of processing personal data ceases to exist, within the framework of the specified regulations.

VMİND acts in accordance with the period prescribed in the relevant legislation for the personal data it has processed; if no such period is prescribed, it retains the personal data only for as long as necessary, limited to the purposes for which they were processed. When a data subject applies to VMİND pursuant to Article 13 of the KVKK requesting the deletion or destruction of their personal data, if the conditions for processing personal data no longer exist, VMİND deletes, destroys, or anonymizes the personal data of the applicant within 30 (thirty) days of receiving the request and informs the data subject.

If not all conditions for processing personal data have ceased to exist, this request may be rejected by VMİND with the reasons explained pursuant to the third paragraph of Article 13 of the KVKK, and the rejection response is notified to the data subject in writing or electronically within 30 (thirty) days at the latest.

### **Periodic Disposal Period**

The periodic disposal period is 6 months. It is carried out in six-month periods following the date on which the obligation to delete, destroy or anonymize personal data arises.

### **Personal Data Committee**

VMİND establishes a Personal Data Committee within its structure. The Personal Data Committee is authorized and responsible for carrying out the necessary procedures and supervising the processes for the lawful retention and processing of the relevant personal data, and for their retention and processing in accordance with the Privacy Policy and the Personal Data Retention and Disposal Policy. The titles and job descriptions of VMİND employees assigned to the Personal Data Committee are specified below.

### **Update**

VMİND reserves the right to make changes to the Personal Data Retention and Disposal Policy in line with changes under the relevant Law and Board decisions. If this Policy is updated, information regarding the relevant change shall be specified in the annex to the Policy.

<b>Recording Medium</b>	Any type of environment containing personal data processed by wholly or partly automatic means or by non-automatic means provided that they form part of a data recording system.
-------------------------	---

<b>Processing of Personal Data</b>	Any operation performed on personal data such as obtaining, recording, storing, preserving, altering, reorganizing, disclosing, transferring, taking over, making available, classifying, or preventing the use of personal data through wholly or partly automatic means or non-automatic means provided that they form part of a data recording system.
------------------------------------	---

#### 4. SANCTIONS

The provisions of the

**Disciplinary Procedure** shall apply to all personnel who do not act in accordance with this policy.