

SEMPRO Consultancy, Engineering and Representative Services Ltd.

POL-002

Policy on Processing, Protection, Storage and Destruction of Personal Data

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Used	Sempro

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1. SECTION 1 – INTRODUCTION

1.1. Purpose

This Policy on Processing, Protection, Storage and Destruction of Personal Data sets out the basic principles on how to comply with the regulations in the Personal Data Protection Law No. 6698 in the process of processing, protection, storage and destruction of personal data by "Sempro Consultancy, Engineering and Representative Services Ltd." ("Company") and provides the necessary transparency by informing the Data Subjects by explaining the basic principles adopted in terms of compliance with the LPPD.

1.2. Scope

The PDP Policy is applied in all activities carried out by the Company for the processing, protection, storage and destruction of personal data. PDP Policy; It is related to all personal data of the Company's partners, officials, employee candidates and employees, customers or customer employees, suppliers or supplier employees, employees of the institutions and organizations with which the Company cooperates, and third parties, which are fully or partially automated or processed by non-automated means provided that they are part of any data recording system

1.3. Application of Policy

The provisions of the relevant legislation in force regarding the processing, protection, storage and destruction of personal data will primarily apply; in case of incompatibility between the provisions of the legislation and the PDP Policy, the provisions of the legislation will prevail.

The PDP Policy is formed by concretizing and organizing the rules existing within the scope of the relevant legislation in relation to the Company's practices

1.4. Definitions

Open Consent	It is consent on a specific subject, based on information and expressed with free will.
Anonymization	Making personal data impossible under any circumstances to associate it with an identified or identifiable natural person, even by matching it with other data.

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Destruction	Deletion, destruction or anonymization of personal data.
Personal Data	Any information relating to an identified or identifiable individual.
Destruction of Personal Data	Deletion, destruction or anonymization of personal data.
Processing of Personal Data	It refers to all kinds of operations performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data in whole or in part, automatically or non-automatically, provided that it is part of any data recording system
Board	It refers to Personal Data Protection Board.
Institution	It refers to Personal Data Protection Authority.
PDP Policy	Refers to the Company's Policy on Processing, Protection, Storage and Destruction of Personal Data.
LPPD	Refers to the Law No. 6698 on the Protection of Personal Data.
Sensitive Personal Data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Periodic Disposal	This refers to the automatic deletion, destruction, or anonymization of personal data at predetermined intervals, if the legal justification for processing the data no longer exists.
Deletion	This refers to the process of permanently erasing personal data so that it cannot be used again for any purpose by the relevant users

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Data Recording System	This refers to a recording system designed to manage and process personal data according to predetermined criteria.
Company	Sempro Consultancy, Engineering and Representative Services Ltd.
Data Processor	A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.
Data Subject	The individual whose personal data is processed
Data Controller	The person who determines the purposes and means of processing personal data and manages data storage location is kept systematically.
Destroy	This refers to the process of making personal data inaccessible, irretrievable and non-reusable by ensuring it cannot be re-identified or used for any purpose by anyone.

2. SECTION 2 - ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA

2.1. Ensuring the Security of Personal Datası

To comply with LPPD, the Company implements security measures appropriate for the type of personal data it processes in order to prevent unauthorized disclosure, access, transfer or other security risks. Within this framework, the Company utilizes both technical safeguards and administrative controls to ensure the necessary level of security aligned with the Board's published guidelines. Regular audits are conducted internally or commissioned externally to verify the effectiveness of these measures.

2.2. Protection of Sensitive Personal Dataı

The LPPD places particular importance on protecting certain sensitive personal data that, if processed, such data could lead to discrimination against their owners. This data, categorized as 'Special Categories of Personal Data', includes information related to race, ethnicity, political views, religious beliefs, appearance and dress, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

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The Company demonstrate the necessary sensitivity to ensure the security of sensitive personal data and carefully implements the technical and administrative measures it has taken to comply with the legal requirements and the Board defined guidelines guidelines for secure processing of sensitive personal data.

3. SECTION 3 - ISSUES RELATED TO THE PROCESSING OF PERSONAL DATA

3.1. Processing of Personal Data in Compliance with the Principles Stipulated in the Legislation

The following principles are taken into account when processing personal data:

3.1.1. Processing in accordance with the Law and the Rules of Honesty

The Company Acts in accordance with legal regulations, especially the Constitution of the Republic of Turkey, and the rule of honesty in the processing of personal data. Within this framework, personal data are not collected or processed without the knowledge of the Data Subject and are not used in a way that would cause unfairness against the Data Subject and are processed to the extent and limited to the extent required by the Company's activities

3.1.2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

The Company takes the necessary measures within its technical capabilities to ensure that personal data is accurate and up-to-date throughout the period of processing and keeps the necessary channels open and establishes the necessary mechanisms to ensure the accuracy and currency of personal data for certain periods of time.

3.1.3. Processing for Specific, Explicit and Legitimate Purposes

The company determines the purpose for which personal data is processed by considering its activities and ensures that related personal data is processed in line with these purposes.

3.1.4. Being relevant, limited and proportionate to the purpose for which they are processed

The Company collects personal data only to the extent and quality required by its activities and processes it limited to the specified purposes. Accordingly, the Company determines the purpose of personal data processing before starting to process personal data and avoids processing personal data based on the potential future uses.

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3.1.5. Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

The Company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legislation to which the relevant activity is subject. In this context, the Company first determines whether a period is stipulated in the legislation for the storage of the relevant personal data, and if a period is determined, it acts in accordance with this period. If there is no period determined within the scope of the legislation, personal data are retained for the period required for the purpose for which they are processed.

3.2. Terms of Processing of Personal Data

In the presence of the following conditions, the company carries out the processing of personal data; personal data is not be processed if none of the specified conditions are met. The activity of the processing of personal data may be based on only one of the conditions listed below or it may be based on more than one of the conditions.

3.2.1. Explicit Consent of the Data Subject

One of the conditions for personal data processing is the explicit consent of the Data Subject, and this consent must be expressed with free will on a specific subject, based on information. In the presence of other personal data processing conditions listed below, personal data may be processed without the explicit consent of the Data Subject.

3.2.2. Explicitly Stipulated in Laws

If there is an explicit provision in the relevant law that personal data may be processed, the existence of a data processing condition will be mentioned and data processing activity may be carried out based on this condition.

3.2.3. Failure to Obtain Explicit Consent of the Data Subject Due to Actual Impossibility

In cases where the Data Subject is not in a position to give his/her consent, in other words, in the case of a real impossibility, or in cases where the consent of the Data Subject cannot be validated, in other words, in cases where the Data Subject is unable to disclose his/her consent due to legal invalidity, the personal data of the Data Subject may be processed when the processing of personal data is mandatory in order to protect the life or physical integrity of the Data Subject or another person.

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3.2.4. Directly Related to the Establishment or Performance of the Contract

Provided that it is directly related to the establishment or performance of a contract to which the Data Subject is a party, personal data processing activity may be carried out

3.2.5. Fulfillment of a Legal Obligation

Personal data of the Data Subject may be processed if it is mandatory to process personal data in order for the Company to fulfill a legal obligation

3.2.6. Publicization of Personal Data by the Owner

In the event that the Data Subject has made his/her personal data public, i.e. disclosed to the public in any way, the personal data concerned may be processed in a manner limited to the purpose of the publication.

3.2.7. Data Processing is Mandatory for the Establishment, Exercise or Protection of a Right

If the processing of personal data is mandatory for the establishment, exercise or protection of a right, personal data processing activity may be carried out in parallel with this obligation.

3.2.8. Data Processing is Mandatory for the Legitimate Interest of the Company

In the event that personal data processing is mandatory for the legitimate interests of the Company, personal data processing activity may be carried out provided that it does not harm the fundamental rights and freedoms of the Data Subject. In order to determine the existence of this condition, the "balance test" accepted in practice is performed.

3.3. Processing of Special Categories of Personal Data

Sensitive personal data are processed by the Company in accordance with the principles set out in this PDP Policy, by taking the necessary administrative and technical measures, including the methods to be determined by the Board, and as set out below:

- **Sensitive personal data relating to health and sexual life** may be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services,

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planning and management of health services and financing, without seeking explicit consent. Otherwise, the explicit consent of the Data Subject is obtained for the processing of such special categories of personal data.

- **Sensitive personal data other than health and sexual life** can be processed without the explicit consent of the Data Subject if it is explicitly stipulated in the laws, in other words, if there is an explicit provision regarding the processing of personal data in the law to which the relevant activity is subject. Otherwise, the explicit consent of the Data Subject is obtained for the processing of such special categories of personal data.

3.4. Informing Data Subject

In accordance with Article 10 of the Law and relevant regulations, the Company informs Data Subjects about the processing of their personal data. This includes the purpose of processing, the Data Controller's identity, recipients of the data, data collection methods, the legal basis for processing, and data subjects' rights.

3.5. Transfer of Personal Data

3.5.1. Domestic Transfer of Personal Data

The Company is obliged to act in accordance with the regulations stipulated in the LPPD and the decisions taken by the Board regarding the transfer of personal data. In this context, the Company may transfer personal data and sensitive personal data to natural persons or private legal entities, authorized public institutions and organizations, and other relevant third parties in accordance with the regulations stipulated in Article 8 of the LPPD, for legitimate purposes and by taking the necessary security measures.

3.5.2. Transfer of Personal Data Abroad

In accordance with Article 9 of the LPPD, personal data are not transferred abroad as a rule without the explicit consent of the Data Subject. However, in exceptional cases where explicit consent is not sought for the transfer of personal data, in addition to the processing and transfer conditions that do not require consent, there must be adequate protection in the country where the data will be transferred. The Board determines and announces whether adequate protection is provided.

In the absence of adequate protection, data controllers both in Turkey and in the relevant foreign country must undertake in writing to provide adequate protection and obtain the Board's authorization.

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4. SECTION 4 - PURPOSES OF PROCESSING PERSONAL DATA

By the Company; personal data is processed for the following purposes: Execution of company operations, recruitment and dismissal processes, leave processes, processes of creating employee personnel files such as salary payment processes, processes of planning activities, processes of sending announcements, processes of documenting participation in training, service sales processes, execution of administrative processes, planning of human resources processes, KOSGEB qualified personnel support processes, payment processes, promotion processes, meeting processes, fulfillment of tax obligations, contract processes, training processes, communication activity processes, planning of business activities and strategies; conducting candidate / intern / student selection and placement processes, fulfilling the obligations arising from the employment contract and legislation for employees, conducting fringe benefits and benefits processes for employees, conducting training activities, conducting access authorizations, conducting activities in accordance with the legislation, conducting financial and accounting affairs, conducting assignment processes, following and conducting legal affairs, conducting communication activities, planning human resources processes, conducting / supervising business activities, Conducting activities to ensure business continuity, conducting goods / service procurement processes, conducting goods / service sales processes, conducting goods / service production and operation processes, conducting activities for customer satisfaction, organization and event management, conducting contract processes, conducting sponsorship activities, conducting strategic planning activities, following up requests / complaints, conducting talent / career development activities, providing information to authorized persons, institutions and organizations, conducting management activities.

5. SECTION 5 - STORAGE AND DESTRUCTION OF PERSONAL DATA

5.1. Legal Grounds for Retention of Personal Data

The Company retains the personal data it processes within the scope of its activities in accordance with the periods stipulated in the relevant legislation. In this context, personal data, including but not limited to those listed, are mainly retained for the retention periods stipulated in accordance with the legislation and administrative regulations that the Company must comply with, within the scope of the following laws and secondary regulations in force pursuant to these laws: Law No. 6698 on the Protection of Personal Data, Turkish Code of Obligations No. 6098, Social Insurance and General Health Insurance Law No. 5510, Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed through These Publications, Occupational Health and Safety Law No. 6361, Commercial Code No. 6102, Labor Law No. 4857, and Defense Industry Security Law No. 5202..

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5.2. Personal Data Storage Environment

Personal data are stored by the Company in accordance with legal requirements and in secure environments listed in the table below.

Electronic Environment	Physical Environment
<ul style="list-style-type: none"> • Website • Google Mail • Google Drive • Jotform.com • Computer • "Paraşüt" Accounting Program • Flash Based Storage Media 	<ul style="list-style-type: none"> • Physical Folder • Paper • Manual data recording systems • Published media

5.3. Data Processing Process, Maximum Retention and Destruction Period

Regarding the personal data processed by the Company, the retention periods on the basis of each personal data are included in the Company's personal data processing inventory; on the other hand, the retention periods applicable to each process are specified in this PDP Policy, including but not limited to the following:

Updates and changes will be made in the specified retention periods, if necessary. For personal data whose retention periods have expired, ex officio deletion, destruction or anonymization is carried out by the Company.

Data Processing Department	Data Processing Process	Data Storage Environment		Storage Period (Based on the maximum periods specified in the inventory)	Destruction Period
		Electronics	Physical		

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Human Resources	Employee Personnel File Establishment	Google Drive, Google Mail, Computer Environment, Website of the Data Controller	Physical Folder	For the term of the employment contract and 10 years following its termination.	After the storage period ends, at the next scheduled destruction
	Human Resources Process Management	Google Drive, Google Mail, Computer Environment			
Administrative Affairs Management	Execution of Company Operations	Google Drive, Google Mail, PC Environment	Physical Folder	During the period of validity of the certificate and for a period of 10 years thereafter.	After the storage period ends, at the next scheduled destruction
	Execution of Administrative Processes	Google Mail, Computer Environment	Physical Folder	Updated and retained indefinitely during validity period and as required	After the storage period ends, at the next scheduled destruction
	Execution of Service Sales Processes	x	Physical Folder	10 years	After the storage period ends, at the next scheduled destruction
Project Management	Execution of Company Operations	Google Drive, Google Mail, Computer Environment, Website of the Data Controller	Physical Folder	Updated and retained indefinitely during validity period and as required	After the storage period ends, at the next scheduled destruction
	Planning and Execution of Meetings	Google Drive, Google Mail		10 years	

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	Publicity and Marketing process	Google Drive, Google Mail, Website of the Data Controller		During training and as long as your relationship with individuals continues	
Accounting	Goods / Services - Buying / Selling Processes	Google Mail	Physical Folder	10 years	After the storage period ends, at the next scheduled destruction
	Tax compliance processes	Google Mail, "Zirve" Accounting Program	x	5 years	After the storage period ends, at the next scheduled destruction
	Employee record creation	Google Mail	Physical Folder	During the duration of the employee's employment contract and for 10 years after the termination of the employment contract	After the storage period ends, at the next scheduled destruction
Management	Execution of Contract Processes	Computer Environment, gitLab.com	Physical Folder	10 years after the termination of the contract	After the storage period ends, at the next scheduled destruction
	Execution of Finance and Payment processes	Google Mail	x	6 months	After the storage period ends, at the next scheduled destruction

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				After the termination of the contract of employment and after all payments required by law have been made.	
All Units	Conduct of business - Email and internal correspondence	Google Mail, Google Drive	x	10 years	After the storage period ends, at the next scheduled destruction
	Conduct of business - Retention of contact information	Google Mail, Google Drive	Physical Folder	Retention period 10 years after last interaction with the individual	After the storage period ends, at the next scheduled destruction

5.4. Periodic Destruction Period

In accordance with Article 11 of the Regulation on Deletion, Destruction, or Anonymization of Personal Data, the Company has established a periodic destruction cycle of six months. Consequently, the Company conducts periodic destruction processes in June and December of each year.

5.5. Personal Data Destruction Techniques

Personal data are stored by the Company for a period limited to the extent required by the purpose of data processing and/or for a period specified in the relevant legislation if it is expressly stipulated therein. Personal data shall be destroyed by the Company ex officio or upon the application of the data subject, in accordance with the provisions of the relevant legislation, by the following techniques as soon as it no longer serves the purpose for which it was collected during the periodic destruction periods or the need for its storage in accordance with the relevant legislation is no longer required

5.6. Deletion of Personal Data

Personal data are deleted by the following methods.

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Data Storage Environment	Related Disclosure
Personal Data in Company Servers	Upon the expiration of the retention period for personal data stored on servers, the system administrator initiates the deletion process by revoking the access privileges of the corresponding users.
Personal Data in Electronic Environment	Upon the expiration of the retention period for personal data stored electronically, this data is rendered permanently inaccessible and unusable for all relevant users except the system administrator.
Personal Data in Physical Environment	Upon the expiration of the retention period for physical-format personal data, this data is rendered permanently inaccessible and unusable for all relevant users except the unit manager responsible for archiving the associated documents. Additionally, the data is rendered unreadable by applying an irreversible blackening process using scratching, painting, or erasure techniques.
Personal Data on Portable Media	Upon the expiration of the retention period for personal data stored on portable media, the system administrator with exclusive access privileges encrypts the data and stores it in secure environments along with the encryption keys.

5.7. Destruction of Personal Data

Personal data is destroyed using the following methods.

Data Storage Environment	Related Disclosure
Personal Data in Physical Environment	Paper-based personal data for which the retention period has expired shall be destroyed in a manner that prevents the identification of the information, either by using a paper shredder or by burning, and in a way that it cannot be recovered.
Personal Data in Optical / Magnetic Media	When the retention period of personal data stored on optical or magnetic media has expired, the data shall

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	be destroyed securely. This may involve shredding, melting, or burning the media to ensure that the data cannot be recovered.
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5.8. Anonymization of Personal Data

Anonymization of personal data is to make personal data impossible under any circumstances to associate it with an identified or identifiable natural person, even by matching it with other data. In order for personal data to be anonymized; personal data must be rendered unassociable with an identified or identifiable natural person even through the use of appropriate techniques for the recording medium and the relevant field of activity, such as the return of personal data by the Company or third parties and / or matching the data with other data.

6. SECTION 6 - DATA SUBJECTS RIGHTS AND EXERCISE THEREOF

6.1. Data Subject Rights

Natural persons whose personal data are processed by the Company, by applying to the Company in accordance with the instructions written in the application form on the Company's website, have following rights:

- To know whether their personal data is being processed,
- if their personal data has been processed, request access to a copy of that data,
- To request information about the purpose of processing their data and whether it is used as intended,
- The right to know to whom their data is shared with, both domestically and abroad,
- To request the correction of any inaccurate or incomplete data about themselves and to be notified of these corrections to any third party to whom their data has been shared.
- Even if their personal data has been processed in accordance with the relevant law, it can be requested to be deleted or destroyed in the event that the reasons requiring its processing disappear. In this case, any third parties to whom their data has been transferred will be informed about the deletion,
- To object to the processing of their data exclusively through automated systems that could lead to a negative outcome for them.
- In case of unlawful processing of their personal data, to request compensation for the damages caused.

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6.2. The Company's Obligation to Respond to the Applications of Personal Subjects

When a Data Subject submits a request regarding the above-mentioned data privacy rights, the Company will process it within thirty days, depending on the complexity of the request. If fulfilling the request involves additional costs based on the Board's tariff, the Company may charge a fee to the Data Subject.

The Company may request information from the relevant person in order to determine whether the applicant is the owner of the relevant personal data and may ask the Data Subject questions about the application in order to clarify the issues in the application.

The request can be granted by the Company within the scope of the application and will be fulfilled promptly. Otherwise, the request cannot be granted and the reason for the denial will be explained. If the denial is due to the Company's error and a fee was charged, the fee will be refunded.

The Data Subject has the right to file a complaint to the Board in cases where his/her application is rejected, the answer given by the Company is insufficient or the Company does not respond to his/her application within the time limit. In order to prevent such complaints, the Company takes care to provide timely and satisfactory answers to Data Subjects.

7. SECTION 7 - REVIEW AND UPDATE

This PDP Policy is reviewed once every calendar year and updated in parallel with the changes in legal regulations or changes in the Company's personal data processing processes.

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