



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	1 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

**ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
PERSONAL DATA STORAGE AND DISPOSAL
POLICY**

**ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
PERSONAL DATA STORAGE AND DISPOSAL POLICY**

Document Name : ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
Personal Data Storage and Disposal Policy

Scope : All natural persons whose personal data are processed by
ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.

Prepared by : Legal Department

Date/Version : 22/07/2022

Approved by : Approved by the ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
PDP Board directors and legal department.

TABLE OF CONTENTS

1.	PURPOSE	3
2.	SCOPE	3
3.	DEFINITIONS	3
4.	PRINCIPLES	5
5.	EXPLANATIONS REGARDING THE REASONS THAT REQUIRE STORAGE AND DISPOSAL	6
6.	STORAGE AND DISPOSAL PERIODS	8
7.	PROCEDURES OF STORAGE AND DISPOSAL OF THE PERSONAL DATA BY THE COMPANY/HOLDING	8
7.1.	RECORDING MEDIA	8
7.2.	TECHNICAL AND ADMINISTRATIVE MEASURES	9
7.2.1	Administrative Measures	9
7.2.2	Technical Measures	9
7.3.	PERSONNEL	10
7.4.	PROCEDURES OF PERSONAL DATA DISPOSAL	10
8.	PERSONAL DATA STORAGE AND DISPOSAL POLICY'S RELATIONSHIP WITH OTHER POLICIES	12
9.	MISCELLANEOUS	12
10.	UPDATES	13
11.	ENTRY INTO FORCE	13
12.	MAINTENANCE	13
13.	DISTRIBUTION	13
14.	ANNEXES	13



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	3 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

**ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
PERSONAL DATA STORAGE AND DISPOSAL POLICY**

1. PURPOSE

As ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. (“Company”) protection of personal data is among our top priorities and we strive to act in compliance with all the applicable legislation in this matter. Since the date on which the Personal Data Protection Law no. 6698 (“KVKK” or the “Law”) took effect, we have been placing great importance on protecting the personal data of all the natural persons with whom we come into contact in any way while conducting our commercial activities, and fulfilling all the requirements set forth by the KVKK without exception.

This Personal Data Protection and Privacy Policy (“Policy”) was prepared to inform you regarding the processes and principles related to ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.’s collection, use, disclosure and storage of personal data. This policy includes matters regarding the ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş.’s processing of the personal data owned by the data subjects according to the order set forth in the Personal Data Protection Law no. 6698 (KVKK) and the Regulation on the Erasure, Destruction or Anonymization of Personal Data dated 28/10/2017, and these explanations apply to ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. employees, suppliers, business partners, active and potential customers, visitors and other natural persons who have a business relationship with ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. Your personal data are processed and protected under this Policy with the full understanding of our responsibilities in this regard.

2. SCOPE

This policy involves all personal data owned by the natural persons with whom our Company comes into contact with in any way, which are processed through fully or partially automatic means or non-automated means provided that it is part of a data recording system. Detailed information regarding these data subjects can be found in ANNEX 2 (“ANNEX 2 – Data Subjects”) of this Policy.

3. DEFINITIONS

Abbreviation	Definition
a- <u>Data subject</u>	: Natural person whose personal data is processed
b- <u>Board</u>	: Personal Data Protection Board
c- <u>Law</u>	: Personal Data Protection Law no. 6698
d- <u>Personal Data</u>	: All types of identified or identifiable data
e- <u>Sensitive Personal Data</u>	: Data relating to the race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures of a person and biometric and genetic data
f- <u>Explicit Consent</u>	: Freely given consent based on a certain topic, based on being informed
g- <u>Processing of Personal Data</u>	: All kinds of operations performed on personal data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automated means or by non-automated means provided that they are part of a data recording system
h- <u>Data Recording System</u>	: A recording system where personal data are structured and processed based on certain criteria

- i- Data Controller : A natural or legal person who determines the purposes and means through which the personal data are processed, who is responsible for establishing and managing a data recording system
- j- Data Controllers Registry : A public registry system, to which natural or legal persons who process personal data have to register before they start processing any data
- k- Data Processor : A natural or legal person who processes personal data on behalf of the data controller, based on the authorization given by the data controller
- l- Erasure of Personal Data : Personal data being rendered inaccessible and non-reusable for the relevant users
- m- Destruction of Personal Data : Personal data being rendered inaccessible, irretrievable and non-reusable for anyone
- n- Anonymization : Personal data being rendered non-associable with any identified or identifiable natural person in any way, even by matching with other data
- o- Recipient Group : A group of natural or legal persons to whom the personal data are transferred by the data controller
- p- Relevant User : With the exception of the person or department who are technically responsible for storing, protecting and obtaining backups of the data, persons who process the personal data as per the authorization and instructions given by the data controller or within the organization of the data controller
- q- Disposal : The erasure, destruction or anonymization of the personal data
- r- Periodic Disposal : In the event that all of the conditions for processing personal data as specified in the Law disappear, the erasure, destruction or anonymization process to be carried out ex officio at recurring intervals as specified in the personal data storage and destruction policy,
- s- Recording Media : Any kind of media that includes personal data which is processed through fully or partially automated means or non-automated means provided that it is a part of a data recording system
- t- Personal Data Processing Inventory : An inventory in which data controllers detail the personal data processing activities they carry out depending on their business processes by associating them with the purposes of processing personal data, data category, the recipient group to whom they are transferred and the data subject group and by explaining the maximum time required for the purposes for which personal data are processed, the personal data stipulated to be transferred to foreign countries and the measures taken regarding data security
- u- Regulation : Regulation on the Erasure, Destruction or Anonymization of Personal Data as published on the Official Gazette dated 28/10/2017 and entered into force.

4. PRINCIPLES

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. acts in accordance with the following principles in the storage and disposal of the personal data:

1. In the erasure, destruction and anonymization of personal data, the principles listed in Article 4 of the Law¹ and the technical and administrative measures to be taken within the scope of Article 12 and specified in Article 6.2 of this Policy, the provisions of the relevant legislation, Board decisions and this Policy are fully complied with. The principles listed in Article 4 of the Law are as follows.

- *Processing According to the Principle of Lawfulness and Fairness*

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. Within this framework, personal data are processed to the extent required by and limited to the business activities of our Company.

- ***Ensuring that Personal Data Are Accurate and Kept Up to Date Where Necessary***
ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. takes the necessary measures to ensure that personal data is accurate and up-to-date during the processing period and establishes the necessary mechanisms to ensure the accuracy and currency of personal data for certain periods of time.
 - ***Processing for Specified, Explicit and Legitimate Purposes***
ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. clearly sets out the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with its business activities.
 - ***Being Relevant, Limited and Proportionate to the Purposes for Which They Are Processed***
ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. only collects and processes the personal data to the extent required by the business activities and limited to the purposes determined.
 - ***Being Stored For The Period Laid Down By Relevant Legislation or the Period Required For the Purpose For Which the Personal Data are Processed***
ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legal legislation to which the relevant activity is subject. In this context, our Company first determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. At the end of the retention periods, the personal data are disposed according to the periodic disposal periods or according to the application of the data subject, using the determined means of disposal (erasure and/or destruction and/or anonymization).
2. All procedures performed for the erasure, destruction, anonymization of the personal data are recorded by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. and these records are retained for a period of at least 3 years (pursuant to article 7/3 of the Regulation on the Erasure, Destruction or Anonymization of Personal Data) with the exception of other legal obligations.
 3. Unless a contrary decision is made by the Board, the method of erasing, destroying and anonymizing the personal data ex officio shall be selected by us. However, upon the Data Subject's request, the method shall be selected after explaining the reasons for this preference.
 4. In the event that all of the conditions for processing personal data as specified in articles 5 and 6 of the Law disappear, the personal data is erased, destroyed or anonymized by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. ex officio and upon the data subject's request. If an application is submitted to ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. by the Data Subject for this reason;
 - a. The requests are finalized and the data subject is informed within 30 (thirty) days at the latest,
 - b. If the data under the request have been transferred to third parties, this is communicated to the

third party to whom the data are transferred, ensuring that the necessary procedures are performed before third parties.

5. EXPLANATIONS REGARDING THE REASONS THAT REQUIRE STORAGE AND DISPOSAL

The personal data owned by the data subjects are stored safely in the aforementioned physical or electronic environments by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. in accordance with the KVKK and other relevant legislation for the following purposes:

- (i) Continuing commercial activities,
- (ii) Fulfilling legal obligations,
- (iii) Planning and performance of employee rights and side benefits
- (iv) Managing customer relationships.

The reasons that require storage are as follows:

- a- It is expressly provided for by the laws,*
- b- Provided that it is directly related to the establishment or performance of the contract,*
- c- It is necessary for compliance with a legal obligation to which the data controller is subject,*
- d- Stored with the explicit consent of the data subject,*
- e- Data storage is necessary for the establishment, exercise or protection of any right*
- f- Storage of data is necessary for the legitimate interests pursued by the data controller.*

Pursuant to the regulation, the personal data of the data subject may be erased, destroyed or anonymized ex officio or upon request by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. in the following cases:

- a. Amendment or abolition of the provisions of the relevant legislation that constitute the basis for the processing or storage of personal data,
- b. The purpose requiring the processing or storage of personal data is no longer relevant,
- c. The conditions requiring the processing of personal data under Articles 5 and 6 of the Law are no longer relevant.
- d. When the processing of personal data is performed only subject to explicit consent, the data subject



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	7 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

withdrawing their consent,

- e. Acceptance by the data controller of the application made by the data subject for the erasure, destruction or anonymization of his/her personal data within the framework of his/her rights under subparagraphs (e) and (f) of Article 11 of the Law,
- f. In cases where the data controller rejects the application made by the data subject with the request for the erasure, destruction or anonymization of his/her personal data, his/her response is found insufficient or he/she does not respond within the period stipulated in the Law; a complaint is filed to the Board and this request is approved by the Board,
- g. Although the maximum period of time required for the storage of personal data has elapsed, there are no circumstances justifying the storage of personal data any further,

6. STORAGE AND DISPOSAL PERIODS

In determining the periods of storage and disposal of your personal data obtained by **ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.** in accordance with the provisions of KVKK and other relevant legislation, the following criteria are used, respectively:

1. If a period is stipulated in the legislation regarding the storage of personal data, this period applies. After the expiration of said period, the data shall be subject to the provisions of subparagraph 2.
2. If the period stipulated in the legislation regarding the storage of personal data expires or there is no period stipulated in the relevant legislation for the storage of said data, respectively;
 - a. The personal data are classified based on the definition given in article 6 of the KVKK, as personal data and sensitive personal data. All personal data determined to be sensitive are destroyed. The method to be utilized in destroying such data is determined according to the nature of the data and the importance of storing such data for our company.
 - b. Compliance with the principles set forth in article 4 of the KVKK in terms of the storage of the personal data, e.g. the existence of a legitimate interest for the Company is put into question. Data which may lead to the violation of the principles set forth in article 4 of the KVKK are erased, destroyed or anonymized.
 - c. It is determined which of the exceptions stipulated in articles 5 and 6 of the KVKK apply to the storage of the data. The reasonable periods for which the data must be stored within the framework of the exceptions are determined. At the end of such periods, the data are erased, destroyed or anonymized.

You may find the storage, destruction and periodic disposal periods determined by our **Company** in the annex of this Policy (Annex-2) entitled “*Personal Data Processing Inventory*”.

Personal data whose retention period has expired are destroyed in accordance with the procedures set out in this Policy in 6-month periods within the framework of the disposal periods given in the annex of this policy (Annex-2).



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	8 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

All procedures regarding the erasure, destruction and anonymization of personal data are recorded and the records are kept for at least three years with the exception of other legal obligations.

7. PROCEDURES OF STORAGE AND DISPOSAL OF THE PERSONAL DATA BY THE COMPANY/HOLDING

7.1. RECORDING MEDIA

The personal data owned by the data subjects are securely stored by our company on the media listed in the table below, in accordance with the provisions of KVKK and the regulation in particular and all the relevant legislation, within the framework of international data security principles:

Electronic environments:

- LOGO TIGER COMMERCIAL SOFTWARE PROGRAM
- LOGO PAYROLL - PERSONNEL TRACKING PROGRAM
- FILE SERVER
- MEDITEK OHS SOFTWARE
- FIRE-WALL – FORTINET
- CLOUD – TURKCELL
- NAS BACKUP
- GÜVENLİK TÜRKİYE -PDKS-
- QDMS – CUSTOMER REQUEST AND COMPLAINT
- PSS – ORDER TRACKING PROGRAM
- KAREL SWITCHBOARD PROGRAM
- USB HARDDISK – İREMSoft CASH REGISTER WEIGHING MACHINE PROGRAM
- FORTILOGER – TIMESTAMPED FOR LOG RECORDS

Physical environments:

- Unit Cabinets
- ARCHIVE room
- Secretariat
- SYSTEM ROOM

7.2. TECHNICAL AND ADMINISTRATIVE MEASURES

All the administrative and technical measures taken by our company for the purpose of storing your personal data securely, prevention of its unlawful processing and access, and disposing of the data in accordance with the law, within the framework of the principles set forth in article 12 of the KVKK are listed below:

a. Administrative Measures:



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	9 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

Within the scope of administrative measures our Company;

- a. Restricts internal access to stored personal data to the personnel on a need-to-know basis as per their job description. In restricting access, whether the data is of sensitive nature and the degree of importance are also taken into consideration.
- b. In case the processed data are obtained by others through unlawful means, notifies the relevant authorities and the Board as soon as possible.
- c. In relation with the sharing of personal data, signs a framework agreement on the protection of personal data and data security with the persons with whom the personal data are shared, or ensures data security by adding new provisions to the existing contract.
- d. Employs personnel who are knowledgeable and experienced regarding the processing of personal data and trains its personnel regarding the personal data protection legislation and data security.
- e. Carries out the necessary audits internally or has them performed in order to ensure the implementation of the provisions of Law. Rectifies the privacy and security weaknesses revealed as a result of the audits.

b. Technical Measures:

Within the scope of technical measures our Company;

- a. Carries out the necessary internal controls for the installed systems.
- b. Ensures that the technical infrastructure that will prevent or observe any leaks of data to the outside is procured and the relevant matrices are created.
- c. Checks the system weaknesses on a regular basis and whenever needed by receiving leak test services.
- d. Ensures that the access authorizations of the employees who work in IT departments are kept in check.
- e. The destruction of personal data is performed so that it will be irretrievable and leave no audit trails.
- f. As per article 12 of the Law, all digital media on which the personal data are stored are protected with passwords or cryptographic methods that meet the information security requirements.

7.3. PERSONNEL

You may find the titles, departments and job descriptions of the personnel who are involved in the personal data storage and disposal process *from the list given in ANNEX-1 of this Policy.*

7.4. PROCEDURES OF PERSONAL DATA DISPOSAL

Personal data obtained by our Company in accordance with the KVKK and other relevant legislation shall be destroyed by our Company ex officio or upon the application of the Data Subject in accordance with the provisions of the Law and the relevant legislation, using the techniques specified below, in the event that the personal data processing purposes listed in the Law and the Regulation are no longer relevant.

a. **Personal Data Erasure and Destruction Techniques:**

The principles and procedures of data erasure and destruction techniques by our Company are listed below:

Erasure of Personal Data:

Secure Erasure from Software: When erasing data processed by fully or partially automated means and stored in digital media; methods are used to erase the data from the relevant software in such a way as to make it inaccessible and non-reusable in any way for the Relevant Users.

Removing the access rights of the relevant user on the file or the directory where the file is located on the central server; deleting the relevant lines in databases with database commands or deleting the data in portable media, i.e. flash media, while using appropriate software can be considered within this scope.

However, if the erasure of personal data will result in the inaccessibility of other data within the system and the inability to use this data, personal data will also be considered erased if the personal data is archived by making it non-associable with the person concerned, provided that the following conditions are met.

- Being inaccessible by any other institution, organization or person,
- Taking all the necessary technical and administrative measures to ensure that the personal data may only be accessed by authorized persons.

Secure Erasure by a Specialist: In some cases, it may agree with a specialist to erase personal data on its behalf. In this case, personal data will be securely erased by the person who is an expert in this field in a way that will make it inaccessible and unusable for the Relevant Users in any way.

Obfuscation of Personal Data on Paper Media: This is the method of physically cutting out the relevant personal data and removing it from the document or making it invisible by using fixed ink in a way that cannot be reversed and cannot be read with technological solutions in order to prevent the misuse of personal data or to erase the data that are requested to be erased.

Destruction of Personal Data:

When the Company destroys the personal data, it prefers one or more of the methods specified below.

Physical Destruction: Personal data may also be processed by non-automated means, provided that they are part of a data recording system. When destroying such data, the system of physically destroying the personal data in such a way that it cannot be used afterwards is applied. Destruction of data in paper and



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	11 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

microfiche media should also be carried out in this way since it is not possible to destroy them in any other way.

During the performance of the aforementioned procedures, the Company fully complies with the provisions of the KVKK, the Regulation and other relevant legislation and takes all the necessary administrative and technical measures in order to ensure data security.

b. Personal Data Anonymization Techniques:

Anonymization of personal data is to render 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.

In order for personal data to be anonymized; personal data must be rendered non-associable with an identified or identifiable natural person even by using 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 3rd parties and / or matching the data with other data.

Pursuant to Article 28 of the KVKK, if personal data are processed for purposes such as research, planning and statistics by anonymizing them with official statistics, this situation will be outside the scope of the Law and explicit consent will not be required.

8. PERSONAL DATA STORAGE AND DISPOSAL POLICY'S RELATIONSHIP WITH OTHER POLICIES

In regard to the protection and processing of personal data, which are associated with the provisions of this Policy, our Company also creates sub-policies for internal use and policies for protecting and processing personal data.

9. MISCELLANEOUS

In case of a discrepancy between the KVKK and the other relevant legislation and this Policy, the KVKK and the other relevant legislation shall prevail.

In case of a change in the Policy, the Policy's effective date and the relevant clauses shall be updated accordingly. The update table can be found in the "Document ID" section.

10. UPDATES

This Policy is reviewed and updated once a year by the relevant Company/Legal Department.

11. ENTRY INTO FORCE

This Policy, which was prepared by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. entered into force on the date **22/07/2022**.

12. MAINTENANCE

The responsibility of maintaining this document belongs to the Legal Department.

13. DISTRIBUTION

This Policy is published on the company's website, the Company's intranet and announced to third parties and Company employees.



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	12 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

14. ANNEXES

ANNEX – 1 : Personnel Title, Department, Duty List

ANNEX – 2 : List of Groups of Persons with Whom the Personal Data are Shared

ANNEX – 3 : Personal Data Categories

ANNEX – 4 : Data Subjects

ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.

ANNEX-1

PERSONNEL TITLE, DEPARTMENT AND DUTY LIST

PERSONNEL	DUTY	RESPONSIBILITY
Company Director	Responsible for implementing the personal data storage and disposal policy	Ensuring that the processes for which they are responsible comply with the storage period and managing the personal data disposal process as per the periodic disposal period
Attorney	Legal Department - Responsible for implementing the personal data storage and disposal policy	Ensuring that the processes for which they are responsible comply with the storage period and managing the personal data disposal process as per the periodic disposal period
Human Resources Director	Human Resources Department - Responsible for implementing the personal data storage and disposal policy	Ensuring that the processes for which they are responsible comply with the storage period and managing the personal data disposal process as per the periodic disposal period
Information Technologies Director	Information Technologies Department - Responsible for implementing the personal data storage and disposal policy	Ensuring that the processes for which they are responsible comply with the storage period and managing the personal data disposal process as per the periodic disposal period
Accounting Director	Financial Affairs Department - Responsible for implementing the personal data storage and disposal policy	Ensuring that the processes for which they are responsible comply with the storage period and managing the personal data disposal process as per the periodic disposal period

ANNEX-2

STORAGE AND DISPOSAL PERIODS TABLE

The data storage and disposal periods for the data processed by the Company are determined in the Personal Data Processing Inventory and said Inventory can be accessed through the link [•].

PROCESS	STORAGE PERIOD	DISPOSAL PERIOD
Planning and Execution of Corporate Communication Activities	10 years after the expiration of the business relationship	Within 30 days following the data subject's request for disposal
General Assembly Procedures	10 years	Within 180 days following the expiration of the storage period
Personal data of the Suppliers and Customers	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Responses to the requests for information for court/execution proceedings regarding personnel	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Preparation of agreements	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Recruitment	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Payrolling	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Assignment of vehicles to employees	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Occupational health and safety practices	15 years after the expiration of the business relationship	Within 180 days following the expiration of the storage period
Logging/Recording/Monitoring Systems	1 year	Within 180 days following the expiration of the storage period
Process of creating master data	10 years after the expiration of the business relationship	Within 180 days following the expiration of the storage period
Information regarding company partners and board members	10 years	Within 180 days following the expiration of the storage period
Payment procedures	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period



**ÜNAL SENTETİK DOKUMA SAN.
VE TİC. A.Ş.
HUMAN RESOURCES POLICY**

Document No.	ORT.KA.PO.008
Page	15 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

Personnel Financing Processes	10 years after the expiration of the business relationship	Within 180 days following the expiration of the storage period
Preserving a certain section of the contractual process and the agreement	10 years after the expiration of the business relationship	Within 180 days following the expiration of the storage period
Contractual procedures, records and documents related to suppliers and customers	10 years after the expiration of the Legal Relationship	Within 180 days following the expiration of the storage period
Emergency Preparations	1 year	Within 180 days following the expiration of the storage period

ÜNAL SENTETİK DOKUMA SAN.
TİC. A.Ş.

ANNEX-3

UPDATES TABLE

The changes made on this Policy are specified in the table below.

DATE OF UPDATE	SCOPE OF CHANGES
[.]	[.]

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş.