

PERSONAL DATA RETENTION AND DESTRUCTION POLICY

1. Purpose

This policy has been prepared for EMPA ELEKTRONİK SAN. VE TİC. A.Ş. to fulfill its obligations stipulated under the Law on the Protection of Personal Data No. 6698 and the Regulation on the Deletion, Destruction or Anonymization of Personal Data, and to explain the procedures and processes regarding the destruction of personal data due to the importance we place on the protection of personal data as a fundamental human right.

2. Scope

This policy covers all personal data processed by our Company through automated or non-automated means, provided that they form part of any data recording system in electronic or physical media.

3. Definitions and Abbreviations

Explicit Consent: Consent based on information regarding a specific matter and declared with free will.

Company: EMPA ELEKTRONİK SAN. VE TİC. A.Ş., located at İ.D.T.M. A Block 4th Floor No:200, Bakırköy, Istanbul.

Cookie: Small files stored on users' devices to store preferences and information.

4. Recording Media

Personal data are securely stored in the following environments:

Electronic media: servers, computers, mobile devices, backup units, software platforms.

Non-electronic media: paper files, manual recording systems, printed and visual media.

5. Implementation

The Company processes personal data in accordance with its mission and the principle of data minimization, using technological infrastructure.

5.1 Reasons Requiring Retention

Personal data are retained for fulfilling legal obligations, managing employee rights, conducting operational processes, and ensuring company security.

5.1.2 Processing Purposes

Human resources operations, communication, security, contractual processes, legal reporting, and evidence for legal disputes.

5.2 Reasons Requiring Destruction

Personal data are deleted, destroyed, or anonymized when legal grounds no longer exist, explicit consent is withdrawn, or processing purpose ends.

5.3 Administrative and Technical Measures

Administrative measures include policies, training, confidentiality agreements.

Technical measures include access control, encryption, firewalls, logging, penetration tests.

5.4 Deletion, Destruction, and Anonymization

Requests are finalized within 30 days. Deleted data become inaccessible; destroyed data are shredded; anonymization uses variable removal, noise addition, or micro-aggregation.

5.5 Retention & Destruction Periods

Periodic destruction occurs every July and January. Retention periods: identity, contact, HR, customer, finance, security, marketing data = 10 years.

6. Responsibility

All units must ensure data security and support the implementation of policies.