

RETENTION AND DESTRUCTION OF PERSONNEL DATA POLICY

1. INTRODUCTION

1.1. Purpose

As Limak Yenilenebilir Enerji A.Ş. (“**Limak**” or “**Company**”); personal data of natural persons, including employees, employee candidates, interns, supplier employees, supplier officials, product or service recipients (customers), shareholders/partners, board members, members of the press, public officials, third parties, business partners, visitors and other third parties shall be stored in accordance with applicable regulations including but not limited to the Constitution of the Republic of Turkey, the Personal Data Protection Law No. 6698 (“**KVKK**”) and the Regulation on Deletion, Destruction or Anonymization of Personal Data (“**Regulation**”), which entered into force through publication on the Official Gazette no. 30224 dated 28.10.2017, and it is our priority to store as well as destroy as and when required such data in accordance with the relevant legislation.

For this reason, we determine and carry out the maximum period required for the purpose for which all personal data obtained during the business processes we execute in the capacity of data controller, and the time and procedures applicable for their destruction according to this Personal Data Retention and Disposal Policy (“**Policy**”).

The purpose of this Policy is to ensure that any applicable technical and administrative measures are taken during the retention and disposal of personal data in order to ensure that such data are stored and disposed of in accordance with the law. At Limak, we attach utmost importance to maintaining the privacy of private life and observe data security at the highest level in the processes of storing and disposing of personal data.

This Policy describes the methods we follow regarding the retention and disposal of personal data obtained during our operations. The information provided under this Policy is an integral part of the Limak Personal Data Protection and Processing Policy and should be interpreted and applied accordingly.

1.2. Scope

This Policy covers all personal data of natural persons, including employees, employee candidates, interns, supplier employees, supplier officials, product or service recipients (customers), shareholders/partners, board members, members of the press, public officials, third parties, business partners, visitors and other third parties, which are being processed by Limak.

The Policy is related to the storage on any electronic and print media and disposal of such personal data processed by the Company, and has been handled and prepared in accordance with the KVKK and other legislation on personal data as well as international regulations and guidelines in this field.

1.3. Abbreviations and Definitions

Term	Definition
Electronic media	The media where personal data can be created, read, modified and written using electronic devices.
Disposal	The deletion, destruction or anonymization of personal data.
Data subject	The natural person whose personal data is processed.
Relevant user	The person who processes personal data in line with the authorization or instructions provided by the data controller, or within the data controller's organization, save for the person or unit responsible with the technical storage, protection and backing up of data.
Redaction	The processes such as blacking out, blurring out, overwriting or otherwise obscuring the whole personal data in a way to render the data impossible to associate with an identified or identifiable natural person.
Personal data	Any information concerning a specific or identifiable natural person.
Board	Personal Data Protection Board
Policy	The Personal Data Retention and Disposal Policy the data controllers use as the basis of setting the maximum time frame required for the processing of personal data, and of deleting, destroying, and anonymizing data.
Anonymization of personal data	Making personal data impossible to associate with an identified or identifiable natural person, even if the data is matched with other data.

Deletion of personal data	Making personal data processed in whole or in part by automated means inaccessible and non-reusable by the relevant users in any way.
Disposal of personal data	The process whereby personal data are rendered completely inaccessible and beyond further use by anyone as well as beyond retrieval.
KVKK	The Law no. 6698 on the Protection of Personal Data.
Regular disposal	The deletion, destruction or anonymization processes to be executed on an ex officio basis at regular intervals as specified in the personal data storage and disposal policy, in case the conditions for the processing of personal data as stipulated in KVKK no longer apply.
Data processor	The legal or natural person processing personal data on behalf of the Data Controller, on the basis of the authorization granted by it.
Data controller	The legal or natural persons which determine the purposes and means of processing personal data, and which are responsible with the establishment and management of the data entry system.
Regulation	The Regulation on Deletion, Destruction or Anonymization of Personal Data, which entered into force through publication in the Official Gazette dated 28.10.2017 and numbered 30224.

2. RESPONSIBILITIES AND DUTIES

The Company contact person fulfills the following duties and responsibilities regarding the processes for the retention and disposal of personal data in coordination with the personal data protection committee (“**PDP Committee**”) established within the Company and/or Limak Holding A.Ş. The decisions on the assignment of these duties to the relevant units rests with the Company management and/or the PDP Committee.

Duties
It is responsible for the preparation, development, updating and publication of this Policy.
It is responsible for periodically reviewing this Policy.
It is responsible with obtaining approval for this Policy.
It is responsible for compliance with this Policy and providing the support required in the preparation and development of the policy and in all activities related to the processes for the retention and disposal of personal data.

3. STORAGE MEDIA

Electronic Media	Physical Media
<ul style="list-style-type: none">● Information Security Devices● Removable Memory● E-mail● Personal Computers / Client Computers● Shared Volumes● Servers● Databases● Software● Backup Systems	<ul style="list-style-type: none">● Folders● Files● Archive rooms

4. DATA RETENTION AND DISPOSAL DETAILS

Limak complies with KVKK in the retention and disposal of any personal data of natural persons, including employees, employee candidates, interns, supplier employees, supplier officials, product or service recipients (customers), shareholders/partners, board members, members of the

press, public officials, third parties, business partners, visitors and other third parties. In this context, the details regarding retention and disposal are provided below.

4.1. Details regarding Data Retention

Various regulations require retention of personal data for a certain period of time. Therefore, we retain the personal data we process for the period stipulated in applicable regulations or, if no such period is stipulated in the regulations, for the period necessary for the purposes for which the personal data are processed.

In cases where we process personal data for more than one purpose, the data is deleted, destroyed or anonymized ex officio in the event that all of the purposes for processing the data cease to apply, or if there is no obstacle in the regulations to the deletion of the data and the data subject requests it.

4.1.1. Legal Grounds of Retention

The personal data processed within the framework of Limak's operations are retained for the period stipulated in the applicable regulations. In this context, personal data are retained as per the periods stipulated primarily in;

- The Law no. 6698 on the Protection of Personal Data,
- Turkish Code of Obligations no. 6098,
- Turkish Code of Commerce no. 6102,
- Turkish Penal Code no. 5237,
- The Private Security Law no. 5188,
- The Income Tax Law no. 193,
- The Legal Profession Law No. 1136,
- The Occupational Health and Safety Law no. 6331,
- The Tax Procedure Code no. 213,
- The Social Security and Universal Health Insurance Law no. 5510,
- The Law no. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed through These Publications,

as well as any secondary regulation in effect.

4.1.2. Processing Purposes Necessitating Retention of Personal Data

The Company retains the personal data it processes within the framework of its operations for the following purposes:

- Executing emergency management processes,
- Implementing information security processes,
- Executing employee candidate / intern / trainee selection and placement processes,
- Executing employee satisfaction and loyalty processes,
- Compliance with the obligations arising from the labor contract and regulations, with respect to employees,

- Execution of fringe benefits and interests for employees,
- Conducting audit / ethics activities,
- Conducting training activities,
- Execution of access authorizations,
- Carrying out operations in line with the regulations,
- Carrying out finance and accounting procedures,
- Securing the physical space,
- Carrying out assignment processes,
- Implementing and executing legal procedures,
- Conducting internal audit / investigation / intelligence operations,
- Carrying out communication activities,
- Planning of human resources processes,
- Executing / auditing business operations,
- Implementing occupational health and safety procedures,
- Carrying out logistics operations,
- Executing goods / services procurement processes,
- Executing goods / services sale processes,
- Executing goods / services production and operation processes,
- Executing customer relations management processes,
- Organization and event management,
- Execution of advertising / campaign / promotion processes,
- Executing risk management processes,
- Executing storage and archive operations,
- Carrying out contract-execution processes,
- Conducting strategic planning activities,
- Keeping track of requests / complaints,
- Ensuring the security of movable property and assets,
- Executing supply chain management processes,
- Executing products / services marketing processes,
- Ensuring the security of the Data Controller operations,
- Carrying out investment processes,
- Providing information to authorized parties, agencies, and organizations,
- Management activities,
- Creating and keeping track of visitor records

4.2. Details regarding Data Disposal

Personal shall be deleted, destroyed or ex officio deleted, destroyed or anonymized by the Company upon the request of the data subject in the following cases:

- Any change or repeal of the provisions of regulations which serve as the basis of the processing of personal data,
- The grounds for the processing or storage of personal data ceasing to apply,

- Revocation of the explicit consent by the data subject, in cases where the processing of personal data occurs only on the basis of explicit consent,
- The Company acceding to the application filed by the data subject, with respect to the deletion or disposal of her personal data within the framework of her rights under article 11 of the Law,
- In cases where Company rejects the data subject's application submitted to it for the deletion or disposal of personal data, and in case the Company's response is not deemed satisfactory or is not submitted within the time frame stipulated in the Law, leading to a complaint to be filed with the Board, and the acceptance of the request by the Board, and
- The lack of any conditions which would justify retention for extended time frames despite the maximum time frame stipulated for the retention of personal data being expired.

5. TECHNICAL AND ADMINISTRATIVE MEASURES

Technical and administrative measures are taken by the Company within the framework of adequate measures determined and announced by the Board for sensitive personal data in accordance with Article 12 and paragraph 4 of Article 6 of the KVKK for secure storage of personal data, preventing unlawful processing and access, and the disposal of personal data in accordance with the law.

5.1. Technical Measures

The measures taken by Limak regarding the personal data it processes are listed below:

- Network security and application security are ensured,
- A closed network is used for personal data transfers through the network,
- Security measures are applied within the scope of procurement, development and maintenance of information technology systems,
- Personal data stored in the cloud is secured,
- Access logs are kept regularly,
- Up-to-date anti-virus systems are in use,
- Firewalls are used,
- The security of personal data is monitored,
- The principle of data minimization proportionate to the purpose of processing personal data is applied,
- Personal data is backed up and the security of the backed up personal data is also ensured,
- User account management and authorization control systems are implemented and monitored,
- Logs are kept in a way to avoid user intervention,
- Attack detection and prevention systems are employed,
- Penetration testing is applied,

- Cyber security measures are in place and their implementation is continuously monitored, and
- Encryption is applied.

5.2. Administrative Measures

The measures taken by Limak regarding the personal data it processes are listed below:

- Training and awareness raising activities on data security for employees are carried out at regular intervals,
- An authorization matrix is developed for employees,
- Corporate policies on access, information security, use, storage and disposal are in place,
- Confidentiality agreements are in place,
- The authorizations of the employees who are reassigned or leave their jobs are revoked,
- Personal data security policies and procedures are established,
- Personal data security issues are reported promptly,
- Necessary security measures govern entrances to and exits from physical environments containing personal data,
- Physical environments containing personal data are secured against external risks (fire, flood, etc.),
- The environments containing personal data are secured,
- Regular and/or random internal audits are conducted and commissioned,
- Existing risks and threats are identified, and
- The awareness of data processing service providers is ensured.

6. PERSONAL DATA DISPOSAL TECHNIQUES

Personal shall be disposed of at the end of the time frame stipulated in applicable regulations or the retention period required for the purpose of processing, either on an ex officio basis by the Company, or upon the request of the data subject as per applicable regulations, using the following techniques:

6.1. Deletion of Personal Data

The techniques to be used by Limak to perform the deletion of personal data in accordance with the law are as follows:

Data Storage Medium	Remarks
Personal data in physical media	Personal data in physical media are deleted by storing them in a secure environment that cannot be accessed by the relevant users in any way.

Personal data in databases	Through the assignment of roles and permissions, the relevant user is denied access to the personal data in the database.
Personal data in central servers	The relevant user's access rights to the directory where the file containing personal data is located are removed.
Personal data stored on portable devices (such as USB, hard disk, CD, DVD)	Files containing personal data are encrypted and the relevant user is prevented from accessing the file.

6.2. Disposal of Personal Data

The techniques to be used by Limak to perform the disposal of personal data in accordance with the law are as follows:

Data Storage Medium	Remarks
Personal data in physical media	Personal data in the physical environment is destroyed by shredding with a paper cutting machine, or burning.
Personal data in databases	The relevant lines of the databases containing personal data are deleted using database commands (e.g. Delete). The relevant rows from the database containing personal data are rendered inaccessible.
Personal data in the cloud	Personal data in the cloud are encrypted during their storage and use, and personal data in these environments are disposed of by destroying the encryption keys used.

Personal data on peripheral (network devices, flash-based media, optical systems, etc.) and local systems	Devices containing personal data are destroyed by physical processes such as incineration, disintegration and melting. In addition, destruction entails the writing random data over existing data using special software, so that the recovery of old data is prevented.
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6.3. Anonymization of Personal Data

The anonymization of personal data refers to the process whereby personal data is rendered completely impossible to associate with a specific or identifiable natural person, even when combined with other data.

In order for personal data to be anonymized; personal data must be rendered impossible to associate with an identified or identifiable natural person, even through the use of applicable techniques in terms of the recording medium and the relevant field of activity, such as the restoration of personal data by the data controller or third parties and/or the matching of data with other data.

7. DATA RETENTION AND DISPOSAL TIME FRAMES

Upon the expiration of applicable retention periods, personal data shall be subject to ex officio deletion, destruction or anonymization by the relevant departments. The retention periods for personal data are established based on the provisions of applicable regulations.

In this context, if the retention of the relevant data by Limak falls is on the grounds of compliance with the law as stipulated in Articles 5 and 6 of KVKK regarding personal data and sensitive personal data, the retention periods for the relevant personal data shall be determined based on these grounds of compliance with the law. The disposal of personal data is carried out in line with the retention periods determined by Limak in accordance with applicable regulations based on the specifics of each relationship. Personal data the retention periods of which have expired shall be deleted, destroyed or anonymized within the regular disposal time frames designated by Limak.

The table below summarizes the general principles regarding the retention periods for personal data processed by the Company. The assessment for specific documents and the category of data it contains should be based on a confirmation with the company's personal data inventory and the Legal Department.

Process	Data Retention Period	Disposal Period
Employee personnel file processes	10 years from termination of employment	At the first scheduled disposal date following the end of the retention period
Employee candidate processes	2 years from the date of application	At the first scheduled disposal date following the end of the retention period
Contractual relationships	10 years to follow the expiration of the contract	At the first scheduled disposal date following the end of the retention period
Log monitoring systems	2 years	At the first scheduled disposal date following the end of the retention period
Camera records	30 days	At the first scheduled disposal date following the end of the retention period

8. REGULAR DISPOSAL TIMES

Pursuant to Article 11 of the Regulation, Limak schedules periodic disposal processes to be executed once every 6 (six) months.

9. PUBLICATION AND STORAGE OF THE POLICY

The signed copy of the Policy is kept by the Company contact person and the most up-to-date version of the Policy is made available to employees electronically via the Company intranet.

10. UPDATE FREQUENCY

The policy shall be updated as needed and upon changes in processes.

11. EFFECT

This Policy have entered into force through Limak Board of Directors approval decision dated 23/12/2019 and numbered 2019/12.