



GALATA WIND ENERJİ A.Ş.
POLICY ON PERSONAL DATA STORAGE
AND DESTRUCTION

1. INTRODUCTION

1.1. Purpose

As Galata Wind Enerji Anonim Şirketi. (“Galata Wind”); we pay attention for storing the personal data of natural persons including employees, employee candidates, interns, intern candidates, visitors, online visitors, supplier officials, supplier employees, subcontractor employees, shareholders / partners, members of the board of directors, product or service buyers, potential product or service buyers and other third parties in accordance with applicable legislation particularly Constitution of Republic of Turkey, Law No. 6698 on the Protection of Personal Data (“**LPPD**”) and Regulation on Deletion, Destruction or Anonymization of Personal Data (“**Regulation**”) entered into force by being published in the Official Gazette dated 28.10.2017 and numbered 30224 and destructing as required and in due time.

For this reason, we determine and carry out the maximum time and processes required for the purpose of the processing of all personal data obtained during the business processes that we carry out as data controller in accordance with this Personal Data Storage and Destruction Policy (“**Policy**”).

In addition, during the storage and destruction of personal data, we take all kinds of technical and administrative measures to prevent unlawful storage and destruction of such data. As Galata Wind, we attach great importance to protecting the privacy of personal life in the process of storing and destructing of personal data and we take into consideration the data security at the highest level.

This Policy contains explanations about the methods we follow for the storage and destruction of personal data obtained during our activities.

1.2. Scope

This Policy covers all personal data of natural persons including employees, employee candidates, interns, intern candidates, visitors, online visitors, supplier officials, supplier employees, subcontractor employees, shareholders / partners, members of the board of directors, product or service buyers, potential product or service buyers and other third parties being processed by Galata Wind.

The policy is about the storage and destruction of these personal data processed by the Galata Wind in all kinds of electronic and printed media, and has been dealt with and prepared in accordance with LPPD and other legislation on personal data and international regulations and guidance documents in this field.

1.3. Abbreviations and Definitions

Abbreviation	Definitions
Electronic environment	Environments where personal data can be created, read, modified and written with electronic devices.
Destruction	The process of deletion, destruction or anonymization of personal data.
Relevant Person	Real person whose personal data is processed.
Relevant User	The person who processes personal data within the organization of the data controller or with the authority and instruction received from the data controller, except the person or unit responsible for the technical storage, protection and backup of the data.
LPPD	Law No. 6698 on the Protection of Personal Data
Obfuscate	Processes such as scratching, staining and blurring of all personal data so that they are not associated with a known or identifiable natural person.
Personal Data	Any information belonging to a known or identifiable natural person.
Board	Personal Data Protection Board.
Policy	The policy on which data controllers accept as the base to determine the maximum amount of time necessary for the purpose for which personal data is processed and for the deletion, destruction and anonymization.
Anonymization of personal data	Making personal data unable to match with a known or identifiable natural person, even if matched with other data.
Deletion of personal data	Making processed personal data inaccessible and unusable again by any means by the relevant users through fully or partially automated means.
Destruction of personal data	Making personal data inaccessible, non-retrievable and unusable by nobody by any means.
Periodic destruction	The process of deletion, destruction or anonymization of the personal data in the LPPD in the event that all the conditions for processing the personal data are eliminated and to be carried out automatically at repeated intervals specified in the personal data storage and destruction policy.



Data processor	Natural or legal person who processes personal data based on the authority granted by and on behalf of the data controller.
Data controller	Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the data recording system.
Regulation	Regulation on Deletion, Destruction or Anonymization of Personal Data entered into force by being published in the Official Gazette dated 28.10.2017 and numbered 30224.

2. RESPONSIBILITY AND DISTRIBUTION OF TASKS

The distribution of titles, units and job descriptions of those involved in the processes of storage and destruction of personal data are given below.

Responsible	Task
GALATA WIND PPD COMMITTEE	Responsible for the preparation, development, updating, periodic review and publication of this Policy.
GALATA WIND EXECUTIVE BOARD	Responsible for the approval of this Policy.

3. RECORDING MEDIA

As Galata Wind, we use the following recording media in order to store the personal data we obtain while performing our activities in accordance with the legal periods.

Electronic Environments	Non-Electronic Environments
<ul style="list-style-type: none"> ➤ Mail and File Server ➤ Mobile devices (such as phone, tablet) ➤ Removable memory such as USB, hard disk ➤ Desktop and laptop computer 	<ul style="list-style-type: none"> ➤ Folders ➤ Files



4. EXPLANATIONS ON STORAGE AND DESTRUCTION

Personal data of natural persons who are employees, employee candidates, interns, intern candidates, visitors, online visitors, supplier officials, supplier employees, subcontractor employees, shareholders / partners, members of the board of directors, product or service buyers and potential product or service buyers is stored and destroyed by Galata Wind in accordance with LPPD.

In this context, detailed explanations about storage and disposal are given below.

4.1. Explanations on Storage

Many regulations in the legislation require that personal data should be stored for a certain period of time. For this reason, we store the personal data we process for the period stipulated in the relevant legislation or for the period required for the purpose of processing the personal data, if such a period is not foreseen.

In cases where we process personal data for more than one purpose, the data is deleted, destroyed or anonymized if there is no obstacle in the legislation for the deletion of the data or if requested by the relevant person.

4.1.1. Legal Reasons Requiring Storage

In Galata Wind, personal data processed within the framework of the activities is stored for the period prescribed in the relevant legislation. In this context, personal data is stored for the prescribed periods of storage in accordance with the followings;

- Law No. 6698 on the Protection of Personal Data
- Turkish Code of Obligations No. 6098
- Turkish Commercial Code No. 6102
- 5237 numbered Turkish Criminal Code
- 4857 numbered Labor Law
- Law no 6356 on trade unions and collective bargaining agreements
- Occupational Health and Safety Law No. 6361
- Tax Procedure Law No. 213
- Social Security and General Health Insurance Law No. 5510
- Regulation of publications on the internet and suppression of crimes committed by means of such publications Law no 5651
- Other secondary regulations in force, in addition to above listed primary legislation.

4.1.2. Processing Purposes Requiring Storage



Galata Wind stores the personal data it processes within the scope of its activities for the following purposes:

- To carry out emergency management processes,
- To carry out information security processes,
- To carry out the application processes of the candidate employees,
- To fulfill the obligations arising from employment contract and legislation for employees,
- To carry out the rights and interests processes for employees,
- To be able to conduct audit and ethical activities,
- To determine access authorizations,
- Execution of activities in compliance with the legislation,
- To conduct finance and accounting works,
- To provide physical place security,
- To conduct assignment processes,
- To carry out legal affairs,
- To conduct internal audit, disciplinary activities,
- To carry out communication activities,
- To be able to conduct human resources processes,
- Execution/supervision of business activities,
- To carry out occupational health and safety activities,
- To carry out business continuity activities,
- To carry out sales processes of goods / services
- To carry out performance evaluation processes,
- To carry out risk management processes,
- To carry out storage and archive activities,
- To carry out contract processes,
- Follow-up of requests and complaints,
- Ensuring the security of movable property and resources,



- To carry out supply chain management processes,
- Execution of wage policy,
- Ensuring the security of data controller operations,
- To give information to authorized persons, institutions and organizations,
- Execution of management activities,
- Creating and tracking visitor records.

4.2. Reasons for Destruction

Personal data is deleted, destructed by the Galata Wind or automatically deleted, destructed or anonymized in the following cases;

- Amendment or abolition of the provisions of the relevant legislation which constitute the basis for processing,
- Elimination of the purpose of processing or storage,
- In case the processing of personal data occurs only with the explicit consent of the relevant person, the person's withdrawal of explicit consent,
- Pursuant to Article 11 of the LPPD, the Galata Wind accepts the application for deletion and destruction of personal data within the framework of the rights of the relevant person,
- In case the Galata Wind rejects the application made by the relevant person about requesting deletion or destruction of personal data, finds the answer inadequate or does not respond within the time period specified in LPPD; complaining to the Board and approval of the request by the Board
- Overdue of the maximum period of time required to store personal data and the absence of any justification for storing personal data longer.



5. TECHNICAL AND ADMINISTRATIVE MEASURES

Technical and administrative measures shall be taken by Galata Wind within the framework of adequate measures determined and announced by the Board for private personal data for storing personal data securely, preventing unlawful processing and access and for the proper destruction of personal data pursuant to Article 12 and Article 6 paragraph 4 of the LPPD.

5.1. Technical Measures

The measures taken by Galata Wind regarding the personal data it processes are listed below;

1. Technical organization within Galata Wind is carried out for the processing and storage of personal data in accordance with the legislation,
2. Network and application security is provided,
3. A closed system network is used for personal data transfers via the network,
4. Key management is applied,
5. Access logs are kept regularly,
6. Firewalls are used,
7. Personal data security is monitored,
8. Necessary security measures are taken regarding entry and exit to physical environments containing personal data,
9. Physical environments containing personal data are secured against external risks (fire, flood, etc.),
10. The security of environments containing personal data is ensured,
11. Personal data is reduced as much as possible,
12. Personal data is backed up and the security of the backed up personal data is also ensured,
13. User account management and authorization control system is implemented and these are followed up,
14. Access logs are kept regularly and without user intervention,
15. Personal data security issues are reported quickly,
16. Intrusion detection and prevention systems are used,
17. Penetration test is applied,
18. Cyber security measures have been taken and their implementation is constantly monitored,
19. Encryption is in use,



20. The necessary technical infrastructure has been established to ensure the security of the databases where personal data will be stored,
21. The processes of the technical infrastructure created are followed and audited,
22. Procedures for reporting the technical measures taken and audit processes and a risk inventory have been established,
23. Technical measures are updated and renewed periodically,
24. Necessary technological solutions are produced by re-examining the risky situations,
25. If sensitive personal data is to be sent via e-mail, it must be sent in encrypted form and using a KEP or corporate mail account,
26. Virus protection systems, firewalls and similar software or hardware security products are used and security systems are established in line with technological developments,
27. Employees who are experts in technical matters are employed.

5.2. Administrative Measures

The measures taken by Galata Wind regarding the personal data it processes are listed below;

1. Policies and procedures for accessing personal data, including employees within the company, have been established.
2. Training and awareness works are conducted at regular intervals on data security for employees.
3. Confidentiality commitments are made for the employees.
4. The authorizations of employees who have a change in duty or quit their job in this field are removed,
5. Enforcement of confidentiality contracts and confidentiality provisions in other contracts that determine the scope of data sharing with third parties has been ensured,
6. Internal and periodic audits are conducted within the company,
7. Prospective risks and risk control and prevention steps are determined,
8. Protocols and procedures for sensitive personal data security have been determined and implemented,
9. In the contracts made with the employees and/or in the policies created, the measures and disciplinary provisions to be taken in case of unlawful processing of personal data by the employees are recorded and



10. The personal data processing activities of the data processors working together or the partners of the data processors are audited.

6. DESTRUCTION TECHNIQUES OF PERSONAL DATA

At the end of the period stipulated in the relevant legislation or the storage period required for the purpose for which they are processed, personal data shall be destroyed by Galata Wind automatically or upon the application of the relevant person in accordance with the provisions of the relevant legislation.

6.1. Deletion of Personal Data

As Galata Wind, in order to perform the deletion of personal data legally, the techniques we use are as follows:

Data Recording Media	Description
Personal data in physical environment	Personal data in the physical environment is deleted using the obfuscating method or by storing the document in a secure environment where is inaccessible to the relevant users.
Personal data in databases	By assigning roles and permissions, the relevant user is prevented from accessing personal data in the database.
Personal data on central servers	The access rights of the relevant user on the directory containing the file including personal data are removed.
Personal data stored on portable devices (such as USB, Hard disk, CD, DVD)	The files containing personal data are stored in encrypted form and the relevant user's access to the file is denied.

6.2. Destruction of Personal Data

As Galata Wind, in order to perform the destruction of personal data legally, the techniques we use are as follows:

Data Recordig Media	Description
Personal data in physical environment	Personal data in physical environment are destructed by grinding with paper cutting machine or burning.
Personal data in peripheral (network devices, flash-based media, optical systems, etc.) and local systems	Devices containing personal data are destructed by physical operations such as incineration, fragmentation into small parts, melting. Furthermore, through the de-magnetization method the personal data on the device becomes unreadable and destructed. Besides; by means of random data entry on the existing data with special software, the recovery process of the old data is prevented and destructed.
Personal data in the cloud media	Personal data contained in cloud media is encrypted by means of cryptographic methods during storage and usage and by destroying the used password keys, personal data contained in these environments are destructed.

6.3. Anonymization of Personal Data

Anonymization of personal data is making personal data unable to match in no way with a known or identifiable natural person, even if matched with other data.

In order to make personal data anonymized; even through the use of appropriate techniques for the recording medium and related field of activity, such as the retrieve of personal data by the data controller or third parties and / or the matching of data with other data it must not be associated with a known or identifiable natural person.

7. STORAGE AND DESTRUCTION TIMES

For personal data of which storage period has expired, the deletion, destruction or anonymization process is carried out by the Information Technologies Department. The storage periods of personal data are determined within the framework of the periods stipulated in the relevant legislation.

In this context, when the storage of the relevant data in Galata Wind is evaluated within the scope of the reasons for compliance with the personal data and private personal data specified in article 5 and 6 of the LPPD, the storage periods for the relevant personal data shall be determined based on the reasons for compliance with this law. The destruction of personal data is carried out by Galata Wind in compliance with the storage period determined pursuant to the relevant legislation in accordance with each relationship. Personal data of which storage periods have expired shall be deleted, destructed or anonymized during the periodic destruction times specified by Galata Wind. The retention periods are



determined in detail in the Data Controllers Registry Information System and the personal data processing inventory.

8. PERIODIC DESTRUCTION TIME

Pursuant to Article 11 of the Regulation, the time of periodic destruction is determined by Galata Wind as 6 months.

9. PUBLISHING AND STORAGE OF THE POLICY

This Policy can be stored in two different media, in paper or electronic form.

Wet signed or electronic signed copies are kept in Galata Wind Financial Affairs Unit and controlled copies are kept in Galata Wind Legal Unit and destroyed by Galata Wind Legal Unit with the written approval of Information Systems Department Manager when necessary.

10. UPDATE PERIOD OF THE POLICY

This Policy is reviewed at least once a year without notice and updated if needed. For this reason, it is recommended that you periodically review the Policy.

11. ENFORCEMENT AND ABOLITION OF THE POLICY

This Policy will enter into force as soon as it is published by Galata Wind. If it is decided to repeal this Policy, if there is a copy of the Policy with wet signature, it is canceled and signed by the Galata Wind Legal Unit with the written approval of the Information Systems Department Manager (with the cancellation stamp or by writing cancellation) and for a period of 5 years. It is kept by the Financial Affairs Unit.