



ER-KIM GLOBAL POLICY

PERSONAL DATA STORAGE AND DISPOSAL POLICY

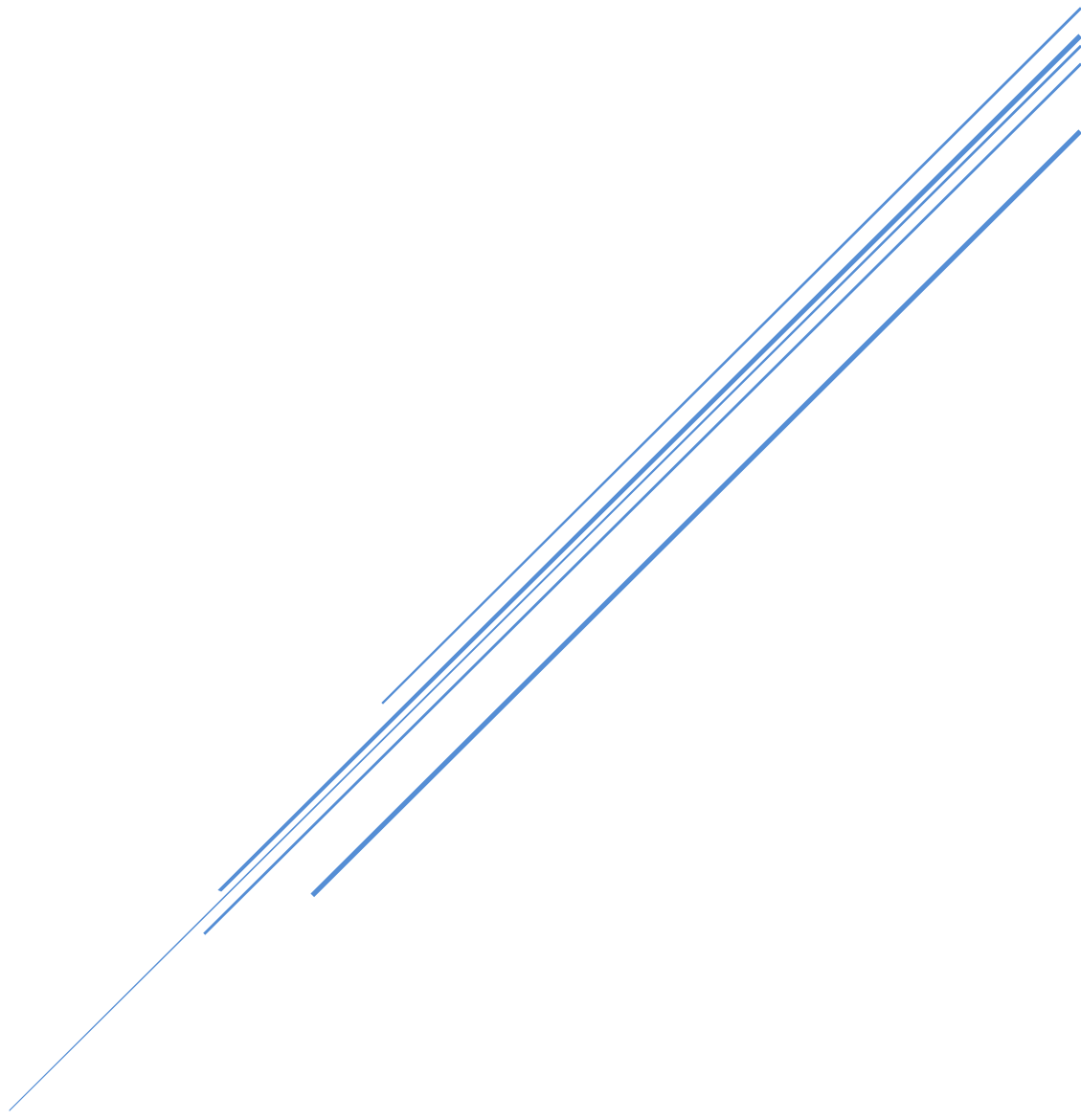




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1. INTRODUCTION

Regarding your personal data processed by our Company; the practices and principles regarding the storage and destruction of your personal data and your rights on your processed personal data are notified to you below. Er-Kim İlaç Sanayi Ve Ticaret Anonim Şirketi (hereinafter referred to as "Er-Kim Turkey" or "Company") will act in accordance with the procedures and processes set out in this Policy in order to comply with the personal data protection legislation and to store and destroy your personal data in accordance with the law and other regulations.

The purpose of this policy is:

- a. To comply with the Law No. 6698 on the Protection of Personal Data ("KVKK") published in the Official Gazette dated 07.04.2016 and numbered 29677 and related legal regulations and
- b. To determine the procedures and principles regarding the storage and destruction processes adopted by our Company and to be implemented within the scope of the data controller's disclosure obligation.

2. SCOPE AND APPLICABILITY

This policy applies to all Er-Kim Turkey employees and data subjects who are in any way connected with Er-Kim Turkey.

3. PRINCIPLES ON DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

This policy has been established in order to set out the procedure regarding the fate of the personal data of the data subjects (*data owners*), whose personal data are processed by obtaining their explicit consent, upon the disappearance of the purposes of collection and processing of their personal data or upon their own request, and the procedures and principles under which these data will be deleted, destroyed or anonymized. The transactions will be carried out in accordance with the procedures and principles specified in the "Regulation on Deletion, Destruction or Anonymization of Personal Data".

All transactions regarding the deletion, destruction or anonymization of personal data shall be recorded and such records shall be kept for at least three years, excluding other legal obligations.

4. REASONS FOR RETENTION AND DESTRUCTION OF PERSONAL DATA

Your personal data is stored by us as specified in the relevant legislation and policies for the reasons of management of human resources processes, explicit consent of data owners, being directly related to the establishment and performance of contracts, being necessary for the legitimate interests of the data controller, ensuring the fulfillment of the objectives of establishing business partnership with various projects, performing commercial activities, corporate law, event management, corporate communication processes management, designing and auditing strategies related to commercial activities, ensuring security and fulfilling the obligations to legally authorized public institutions and organizations and for the purpose of the fulfillment of the obligations, and the termination of the relevant processes and the cases requiring the storage of personal data are eliminated or the request of the data subject or the decision of the Board is destroyed.



5. DEFINITIONS

The equivalents of the technical terms used in the policy are shown below.

BUYER GROUP	The category of natural or legal person to whom personal data is transferred by the data controller.
RELATED USER	Persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except for the person or unit responsible for the technical storage, protection and backup of the data.
DESTRUCTION	It is the deletion, destruction or anonymization of personal data.
LAW	Law on the Protection of Personal Data dated 24/3/2016 and numbered 6698.
RECORDING MEDIA	Any medium that contains personal data that is fully or partially automated or processed by non-automated means, provided that it is part of any data recording system.
PERSONAL DATA PROCESSING INVENTORY	It is the inventory that data controllers create by associating the personal data processing activities they carry out depending on their business processes with the purposes of processing personal data, data category, transferred recipient group and data subject group, and detail the maximum time required for the purposes for which personal data are processed, the personal data envisaged to be transferred to foreign countries and the measures taken regarding data security.
BOARD	Personal Data Protection Board.
PERIODIC DESTRUCTION	It is the process of deletion, destruction or anonymization to be carried out ex officio at recurring intervals specified in the personal data retention and destruction policy in the event that all of the conditions for processing personal data specified in the law disappear.
REGISTRY	The register of data controllers kept by the Personal Data Protection Authority.



DATA RECORDING SYSTEM It is a recording system where personal data is structured and processed according to certain criteria.

DATA CONTROLLER (Er-Kim Türkiye Sanayi ve Ticaret Anonim Şirketi) is the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

ANONYMIZATION It is to make personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching it with other data.

DELETION It is the process of making personal data inaccessible and non-reusable in any way for the relevant users.

DESTRUCTION It is the process of making personal data inaccessible, irretrievable and non-reusable by anyone in any way.

DIRECT IDENTIFIERS On their own, they are identifiers that directly reveal, disclose and make distinguishable the person they relate to.

INDIRECT IDENTIFIERS They are identifiers that, in combination with other identifiers, reveal, disclose and make distinguishable the person with whom they are associated.

DESTRUCTION It is the deletion, destruction or anonymization of personal data.

BLACKOUT Processes such as crossing out, painting and icing of personal data in a way that cannot be associated with an identified or identifiable natural person.

MASKING These are operations such as deleting, crossing out, coloring and starring certain areas of personal data in such a way that they cannot be associated with an identified or identifiable natural person.

6. ENVIRONMENTS WHERE PERSONAL DATA IS RECORDED

Personal data belonging to data subjects are securely stored in the following environments in accordance with the KVKK and the relevant legislation.

ELECTRONIC MEDIA : Er-Kim Turkey corporate file and data server, cloud-based corporate document management system accessed via internet connection



PHYSICAL ENVIRONMENTS: Locked cabinets, drawers, locked archive room

7. PERSONS MANAGING THE PROCESS OF STORAGE AND DESTRUCTION OF PERSONAL DATA AND PERSONS PERFORMING DUTIES IN THIS PROCESS

The titles, units and job descriptions of the authorized and responsible persons involved in the storage and destruction of personal data are specified below.

- In the process of keeping the Job Application Form, CV and character analysis tests - **Human Resources Department, Human Resources Manager**
- In the process of keeping personal files - **Human Resources Department, Human Resources Manager**
- In the process of storing the documents received during the recruitment and termination process - **Human Resources Department, Human Resources Manager**
- In the process of managing the fringe benefits provided to the personnel - **Human Resources Department, Human Resources Manager**
- Human Resources Department, **Human Resources Manager in the process of storing performance scorecards**
- In the process of keeping the data collected within the scope of occupational health and safety legislation (health reports, etc.) - **Human Resources Department, Human Resources Manager, Occupational Physician**
- In the process of storing data on occupational accidents/occupational diseases - **Human Resources Department, Human Resources Manager**
- In the process of making compensation/advance/execution payments - **Human Resources Department, Human Resources Manager - Finance, Finance Manager**
- In the process of storing current account cards and invoices - **Financial Affairs, Accounting Specialists**
- In the process of storing Standard Contracts - **Procurement Department, Procurement Specialist**
- In the process of storing the data collected for value transfers to Healthcare Professionals - **Marketing Department, Congress & Event Unit, Financial Affairs, Accounting Specialists**
- In the process of storing the data collected in event organization and sponsorship processes - **Marketing Department, Congress & Event Unit**
- In the process of keeping Confidential Contracts - **Senior Management, Board of Directors**
- In the process of receiving and storing real-time image recording system inside and outside the company - **IT Department, IT Manager**



- In the process of storing website login and logout information - **IT Department, IT Manager**
- In the process of backing up the program data and e-mails used - **IT Department, IT Manager**
- In the process of recording and storing the management systems (fingerprint, card reading, etc.) of entry and exit to the workplace - **IT Department, IT Manager**
- In the process of using the CVs of the original company employees in the product dossiers - **Regulatory Department, Regulatory Specialist and Ankara Coordinator**
- Process of sending documents (containing personal data) that need to be translated to translation - All departments (depending on the department where the need is directed)
- In the process of using the CVs of the relevant employees of the company from which we receive pharmacovigilance services - **Regulatory Department, Regulatory Specialist and Ankara Coordinator**
- In the process of storing prescription approval forms - **Risk Management Officer, Medical Department**

8. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN TO ENSURE THE PROTECTION OF PERSONAL DATA AND PREVENTION OF UNLAWFUL PROCESSING AND ACCESS

Technical Measures Taken to Ensure Lawful Storage of Your Personal Data and Prevention of Unlawful Processing and Access

- Personal data storage, processing and access activities are monitored through established technical systems.
- Software and hardware including virus protection systems and firewalls are used.
- Technical measures taken are reported to the relevant person.
- Technically knowledgeable personnel are employed.
- Access authorizations are limited, and authorizations are regularly reviewed.
- Backup programs are used in accordance with the law to ensure that personal data is stored securely.
- Access to data storage areas containing personal data is logged and inappropriate access or access attempts are instantly communicated to the relevant persons.

Administrative Measures Taken to Ensure the Lawful Storage of Personal Data and Prevention of Unlawful Processing and Access

- Employees are informed and trained on the law on the protection of personal data and the storage and processing of personal data in accordance with the law.



- Personnel who will process, store and access personal data have been identified in the Personal Data Processing inventory.
- All activities carried out are analyzed in detail specific to all departments, and as a result of this analysis, personal data processing activities are revealed specific to the commercial and administrative activities carried out by the relevant business units.
- In order to ensure the legal compliance requirements determined on a departmental basis, awareness is raised and implementation rules are determined for the relevant departments; the necessary administrative measures are implemented through internal policies and trainings to ensure the supervision of these issues and the continuity of implementation.
- Employees are informed that they cannot disclose the personal data they have learned to others in violation of the provisions of the Law No. 6698 on the Protection of Personal Data and cannot use it for purposes other than processing, and that this obligation will continue after they leave their duties, and necessary commitments are taken from them in this direction.
- In the contracts and documents governing the legal relationship between the employees, records that impose the obligation not to process, disclose and use personal data, except for the instructions of Er-Kim Türkiye Sanayi ve Ticaret Anonim Şirketi and the exceptions imposed by law, are included and the awareness of the employees is created in this regard.

9. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN FOR THE DESTRUCTION OF PERSONAL DATA IN ACCORDANCE WITH THE LAW

SECURE DELETION FROM SOFTWARE: When deleting data processed by fully or partially automated means and stored in digital media; methods are used to delete 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.

DELETION OF RELATED DATA IN THE CLOUD SYSTEM BY ISSUING A DELETE COMMAND: 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 rows in databases with database commands; or deleting data on portable media, i.e. flash media, using appropriate software.

However, if the deletion of personal data will result in the inability to access and use other data within the system, provided that the following conditions are met, personal data will also be deemed deleted if the personal data is archived by making it unassociated with the person concerned.

- Not accessible to any other institution, organization or person,
- Taking all necessary technical and administrative measures to ensure that personal data is accessed only by authorized persons.

SECURE ERASURE BY AN EXPERT: In some cases, Er-Kim Turkey may hire an expert to erase personal data on its behalf. In this case, the personal data will be securely erased by the person specialized in this field in such a way as to make it inaccessible and unusable for the Relevant Users in any way.

BLACKOUT OF PERSONAL DATA ON PAPER MEDIA: It is the method of physically cutting out the relevant personal data from the document or making it invisible by using fixed ink so that it cannot be reversed



and cannot be read with technological solutions in order to prevent the misuse of personal data or to delete the data requested to be deleted.

DE-MAGNETIZATION: It is the method of passing magnetic media through special devices where it will be exposed to high magnetic fields, distorting the data on it in an unreadable way.

PHYSICAL DESTRUCTION: Personal data may also be processed by non-automatic means, provided that they are part of any 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 on paper and microfiche media is also carried out in this way, as it is not possible to destroy them in any other way.

OVERWRITING: The overwriting method is to write random data consisting of 0s and 1s at least seven times over magnetic media and rewritable optical media via special software.

ANONYMIZATION METHODS THAT DO NOT PROVIDE VALUE IRREGULARITY: Anonymization methods that do not provide value irregularity are the generalization, substitution or removal of a specific data or sub-data group from any personal data group without making any changes or additions/subtractions to the personal data stored.

VARIABLE EXTRACTION: It is the anonymization of the existing data set by removing the "highly descriptive" variables from the variables in the data set created after the data collected by the method of removing descriptive data.

REMOVING RECORDS: The stored data is anonymized by removing the row of data that contains a singularity among the data from the records.

REGIONAL HIDING: Anonymization is achieved by hiding the relevant data if it is determinative due to the fact that a single data creates a combination that is barely visible.

LOWER AND UPPER BOUND CODING: It is the anonymization of the values in a data group with predefined categories by combining them by determining a certain criterion with the lower and upper bound coding method.

GENERALIZATION: With the data aggregation method, many data are aggregated and personal data cannot be associated with any individual.

GLOBAL CODING: With the data derivation method, a more general content is created from the content of personal data and it is ensured that personal data cannot be associated with any person.

ANONYMIZATION METHODS PROVIDING VALUE IRREGULARITY: In anonymization methods that provide value irregularity, unlike those that do not provide value irregularity, distortion is created by changing some data in personal data groups.

ADDING NOISE: The method of adding noise to the data, especially in a data set where numerical data is predominant, anonymizes the data by adding some deviations in the plus or minus direction to the existing data at a determined rate.



MICRO MERGE: In the micro-merge method, all data are first sorted into groups in a meaningful order, and the value obtained by averaging the groups is substituted for the relevant data in the current group to ensure anonymization.

DATA EXCHANGE: In the data exchange method, the values of a variable are exchanged between pairs selected from the stored data.

During the realization of the above-mentioned situations, full compliance with the provisions of the KVKK, the Regulation and other relevant legislation is ensured in order to ensure data security and all necessary administrative and technical measures are taken.

10. PERIODIC DESTRUCTION PERIOD OF PERSONAL DATA

Personal data in the possession of Er-Kim Turkey will be checked periodically and those whose processing conditions have completely disappeared will be deleted, destroyed or anonymized. These periodic review and destruction procedures to be applied to personal data are included in the Personal Data Processing Inventory created by ER-KIM Turkey and submitted/submitted to VERBIS system.

11. PERIODS FOR EX OFFICIO DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA

Your personal data will be deleted, destroyed or anonymized in the first periodic destruction process following the date on which the obligation to delete, destroy or anonymize personal data arises. This period will probably not exceed six months. In the event that irreparable or impossible damages arise and there is a clear violation of the law, the Board may shorten the period specified in this article.

12. PERIODS APPLICABLE TO THE DATA SUBJECT'S REQUEST FOR DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA

The Data Owner submits his/her requests regarding the implementation of the Law to ER-KIM Turkey in writing or by other methods to be determined by the Board. ER-KIM Turkey accepts the request or rejects it by explaining its reasoning and notifies its response to the relevant person in writing or electronically within thirty days at the latest. If the request in the application is accepted, it will be fulfilled.

If all of the processing conditions of the personal data subject to the request have disappeared, the personal data subject to the request shall be deleted, destroyed or anonymized. The requests in the application are finalized free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board may be taken as basis. In case of Er-Kim Turkey's fault, the fee charged will be returned to the data owner.

Unless otherwise decided by the Board, Er-Kim Turkey will choose the appropriate method of ex officio deletion, destruction or anonymization of personal data. Upon the request of the data subject, ER-KIM Turkey will select the appropriate method by explaining its justification. If the personal data subject to the request has been transferred to third parties, this situation will be notified to the third party; it will be ensured that the necessary actions are taken within the scope of the Regulation on Deletion, Destruction or Anonymization of Personal Data before the third party.

In matters related to the processing of your personal data, you can apply by filling out the form on the Company's website or in writing* to the address specified below.

**ER-KIM TURKEY SANAYI VE TICARET ANONIM SİRKETİ CONTACT INFORMATION**

CONTACT MAIL ADDRESS: kykk@er-kim.com

HEAD OFFICE ADDRESS: Levazım Mah. Koru Sok. No:2 Zorlu Center D Blok T-3 Katı D:344 Beşiktaş/İstanbul

WEBSITE ADDRESS FOR CONTACT: <https://www.er-kim.com.tr/>

**In case of written application, please indicate the subject on the envelope as "Information Request within the scope of the Law on the Protection of Personal Data".*

13. YOUR RESPONSIBILITIES

All employees are responsible for the daily monitoring of this policy and compliance with its content. Members of the Board of Directors, managers and those authorized to sign on behalf of ER-KIM are responsible for fulfilling the legal and ethical obligations of this policy and for ensuring that those under their control comply with this policy. Violation of this Policy may result in various sanctions, including termination of employment.

14. RECORD KEEPING

All investigations conducted under this Policy are recorded in writing by the Legal and Compliance Department.

15. TRAINING AND COMMUNICATION

Training on this policy forms part of the orientation period for all new employees. Existing employees should receive regular training on how to implement and comply with this policy. The Legal and Compliance Department is responsible for ensuring that this policy is understood and that adequate and regular training is provided on this topic.

In accordance with the principle of continuous improvement, ER-KIM will be in constant communication and discussion with its employees in order to understand this Policy and to develop and improve it in the future.

16. MONITORING AND REVIEW

The Legal and Compliance Department will measure and regularly monitor and review the effectiveness, appropriateness and adequacy of this policy. Any improvements to be identified will be made as soon as possible. This policy does not constitute a part of the employee's employment contract and may be changed by ER-KIM at any time.

**ANNEX 1 DOCUMENT HISTORY AND VERSION CONTROL RECORD**

Document Name	Personal Data Storage and Destruction Policy
Author	Bilge KIYAK, Legal and Compliance Manager
Approved by	CEM ZORLULAR, Chairman of the Board
Published by	Ahu ÖZGÜR, Quality Manager
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00	May 9, 2022	The numbering system changed in accordance with DK-2022-0001. The Policy on Storage and Destruction of Personal Data has been revised in accordance with the new format.