

ER-KİM İLAÇ SANAYİ VE TİCARET A.Ş.
PERSONAL DATA STORAGE AND
DISPOSAL POLICY

HUD 19 088 r.00 - Yayınlanma Tarihi: 23.04.2020

1. The Basis on Erasure, Destruction or Anonymization of Personal Data

This policy is established to determine procedures regarding on what basis and principles personal data will be erased, destructed or anonymised and outcome of personal data after the purpose of collecting and processing of personal data processed by receiving data subject's consent or upon the data subject's demand. All operations will be made in compliance with the principles and basis stipulated by "**Regulation on Erasure, Destruction or Anonymization of Personal Data**".

All operations relating to erasure, destruction and anonymization of personal data are recorded and those records are stored for minimum three years excluding other legal obligations.

2. The Reasons requiring Storage and Disposal of Personal Data

Your personal data is stored by our company in the way that the related laws and policies determined for the reasons and purpose including the management of the process in human resources, existence of the data subject's consent, directly concern to negotiate an agreement and to execute it, the necessity for the legitimate interest of the controller, to ensure accomplishment of objectives of an agreement or setting up a business partnership, practice of the commercial activity, the company law, the management of efficiency the management of process in corporate communication, the planning and review of the strategies related the commercial activity, maintaining the safety and the fulfilment of the obligations to the legally authorised public institutions, and your personal data processed are disposed with the board decision, upon the data subject's demand or as a result that the necessity of the storage of personal data is no longer exist because the process herein comes to the end.

3. The Definitions

The definitions of the terms included in the policy are explained below.

Recipient group	: means category of natural or legal persons to which the personal data are transferred by the data controller,
User concerned	: means persons who process personal data within the organization of the data controller or upon authorization and instructions received from the data controller, other than the person or department which is responsible for the technical storage, protection and back up of personal data,
Disposal	: means erasure, destruction or anonymization of personal data,
Law	: Personal Data Protection Law No. 6698 and of 24/3/2016,
Recording medium	: means any type of environment that keeps the personal data processed wholly or partially by

automated means or non-automated means which provided that form part of a data filing system,

- Personal data processing inventory** : means the inventory which is detailed by explanations of the followings: personal data processing activities of data controllers according to their business processes; purposes and legal ground of personal data processing; data category; maximum data storage period required for the purposes formed relating to the recipient group to whom the data are transferred and with data subject groups, and for personal data processing; personal data envisaged to be transferred to foreign countries; and measures taken relating to the data security,
- Personal data storage and disposal policy** : means the policy which data controller issues as a basis for erasure, destruction and anonymization of personal data and determination of maximum storage period for the purpose for which personal data are processed,
- Board** : means Personal Data Protection Board,
- Periodic Disposal** : means the erasure, destruction or anonymization process which is determined in the personal data storage and disposal policy and to be carried out periodically ex officio, in the event that all of the conditions for processing laid down in the Law no longer exist,
- Registry** : means Data Controllers' Registry kept by the Personal Data Protection Authority,
- Data filing system** : means the filing system where personal data are processed by being structured according to specific criteria,
- Data Controller** : (Er-Kim İlaç Sanayi ve Ticaret Anonim Şirketi) means the natural or legal person who determines the purpose and means of processing personal data and is responsible for the establishment and management of the data filing system,
- Anonymizing** : means rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data

Erasure	: is the process of making personal data inaccessible and non-reusable by any means for the Related Users
Destruction	: is the process of making personal data inaccessible and non-reusable by any means for anyone
Direct Identifiers	: By themselves, identifiers that directly reveal, disclose and distinguish the person they are in contact with,
Indirect Identifiers	: Descriptors that come together with other descriptors to reveal, disclose and distinguish the person they are associated with,
Blanking	: means the process of crossing out, blurring or inking the whole of personal so as to render them invisible or not relatable to natural person who either can be identified or not
Masking	: means the process of removing, crossing out, blurring or inking certain part of personal data so as to render them invisible or not relatable to natural person who can either be identified or not

4. The Medium where Personal Data are recorded

Personal data belonging to data subjects is safely stored in compliance with the Law and the related laws as indicated below.

Electronic media	: Er-Kim İlaç corporate file and data server, cloud-based corporate document management system accessed via internet connection
In written form	: Locked cabins and drawers, locked archive room

5. Authorised Department and Person operating the Process of Storage and Disposal of Personal Data

The positions, departments and missions of authorised person for process of storage and disposal of personal data are indicated below.

- In the process of the storage of job application form, CV and the character analysis test - **Human Resources, Chief of Human Resources**
- In the process of the storage of personal file - **Human Resources, Chief of Human Resources**
- In the process of keeping the documents received during the recruitment and dismissal phase - **Human Resources, Chief of Human Resources**
- In the process of managing additional benefits provided to employees - **Human Resources, Chief of Human Resources**

- In the process of the storage of efficiency reports - **Human Resources, Chief of Human Resources**
- In the process of the storage of data collected in the context of the law on Occupational Health and Safety (health report etc.) - **Human Resources, Chief of Human Resources, Workplace Doctor**
- In the storage of data related with occupational disease/work accident - **Human Resources, Chief of Human Resources**
- In the process of making compensation / advance / executive payments - **Human Resources, Chief of Human Resources - Finance, Finance Manager**
- In the process of keeping current account cards and invoices - **Finance, Accounting Specialists**
- In the process of storing Standard Contracts - **Finance, Accounting Specialists**
- In the process of storing data collected for value transfers to Healthcare Professionals - **Marketing, Marketing Assistant, Finance, Accounting Specialists**
- In the process of storing the data collected in the event organization and sponsorship processes - **Marketing, Marketing Assistant**
- In the process of keeping confidential contracts - **Top Management, Board of Directors**
- In the process of taking and storing a real-time image recording system inside and outside the company - **IT, IT Manager**
- In the process of storing website entry and exit information - **IT, IT Manager**
- In the process of backing up the program data and e-mails used - **IT, IT Manager**
- In the process of recording and storing the management systems (fingerprint, card reading etc.) of entry and exit to the workplace - **IT, IT Manager**
- In the process of using the CVs of the original company employees in the product files - **Licensing Department, Licensing Specialist and Ankara Coordinator**
- The process of sending documents to be translated (containing personal data) to translation - **All departments** (according to the department to which the need is directed)
- In the process of using the CVs of the relevant employees of the company we receive pharmacovigilance service - **Licensing Department, Licensing Specialist and Ankara Coordinator**
- In the process of storing prescription approval forms - **Risk Management Officer, Medical Department**

6. The Organisational and Technical Measures taken to Protect Personal Data and to avoid illegally Processing and Access.

The Technical Measures Taken to legally Store and to avoid illegally Processing and Access of Personal Data of Personal Data

- ✓ The operations of storage, processing and access of personal data are reviewed by the established technical systems.
- ✓ The software and hardware including virus protection and firewall are used.
- ✓ The measures taken are reported to related person.
- ✓ Staff who has knowledge about technical matters are employed.

- ✓ Access authorisations are restricted and regularly reviewed.
- ✓ The back-up programmes that are pursuant to the law are used in order to store safely personal data
- ✓ Unjustified accesses or access attempts are instantly reported to related person by using log system for the access of the data storage medium

The Organisational Measures taken to legally store and to avoid illegally Processing and Access of Personal Data

- ✓ The employees are informed and educated about the Personal Data Protection law and legally storage and processing of Personal data.
- ✓ The authorised employee to process, to store and to access personal data in data processing inventory is appointed
- ✓ All operations carried out are detailed analysed in the context of each department and as a result of this analysis, the operations of data processing are revealed in the context of commercial and organisational activities carried out by the related department
- ✓ The awareness is raised and the practice rules are determined, in the context of the related department in order to provide the requirements of legally adaptation.
- ✓ The employees are informed about their liabilities that the employees can not share the personal data improperly to KVKK and may not use them out of the purpose of data processing. The employees are aware of that their liabilities herein are continued after leaving from the job. In this sense the undertakings are provided by the employees.
- ✓ The liabilities not to process, disclose and use personal data except the Company's direction and exceptions imposed by the related laws, are established in the agreement and documents regulating the legal relationship among employees.

7. The Technical and Organisational Measure to be taken for legally Disposal of Personal Data

- **Safely erasure of data from the software:** in the process of erasure data which is processed in completely or partially electronic way and stored in digital media, the method which renders the data non reusable and inaccessible by no means, is used for erasure of the data from the software.
- **Erasure of data in the cloud system with the file deletion order:** These can be deemed in this context that removing the authorisation of access of related person on the files in the central server, erasure of related texts in the database with the database order or erasure of data in the removable media by using relevant software.

However, if the erasure of personal data cause inaccessibility and non-use of the other personal data in the system, then archiving personal data as rendering them not relatable to anyone, is also deemed as erasure process on the fulfilment of the conditions indicated below.

- It shall be inaccessible to any institutions or person
- All organisational and technical measures shall be taken so as to render personal data accessible by only authorised person.

- **Safely erasure by the expert:** Er-Kim may employ an expert for erasure of personal data. In this case, personal data will safely be erased by the expert so as to render them non reusable and inaccessible by any means.
- **Obscuring personal data in written form:** it is the method used to avoid the use of personal data out of the purpose or to erase personal data upon the demand, which related personal data is removed from the document by cutting the related paper or is inking personal data by an expert so as to render it inaccessible and non-reusable by no means.
- **Magnetisation:** it is the method that the data on the magnetic medium is broken by using certain devices in which magnetic field is exposed to magnetic medium.
- **Material destruction:** Material data can be automatically processed if they are part of a data recording system. In disposal of such data, the system materially destructing personal data in the way that personal data become non reusable and inaccessible. Personal data in written form and in micro office medium is destructed in this way because of non-availability of other methods.
- **Overwrite methods:** it means writing maximum 7 times random data consisted of 0 and 1 as numbers through magnetic media and re-writable optic media via certain software
- **The anonymization methods not causing irregularity of valuation:** By this method, without any changes on or add on/drop from personal data, any personal data group can be generalised, exchanged each other or certain data or sub data of this personal data group can be removed.
- **Removing parameter:** With the removing descriptive data methods, available data set is anonymised by removing the high-degree descriptive ones of parameter in the data set formed after collected data is gathered.
- **Removing records:** The stored data is anonymised by removing data line including singularity among data from the records.
- **Regional Cover-up:** If a single data has descriptive feature because it creates hardly visible combination, the anonymising is carried out by concealing the related data.
- **Codifying lower and upper limits:** With this method, valuations in a data group placed in the predefined categories are anonymised by associating by determining certain limit.
- **Generalisation:** With this method, several data are consolidated and the personal data is rendered as non-relatable to anyone.
- **Global codifying:** This method creates more general content than personal data and ensures rendering personal data not relatable to anyone.
- **The Anonymization method causing irregularity of valuation:** with this method which is opposite to the methods causing not irregularity of valuation, the broken is created by changing data in the personal data groups
- **Adding Noise:** with this method, the data is anonymised in data set in which numerical data are predominant, by adding several deviations in positive or negative directions on available data.
- **Micro Association:** in this method that firstly all data is sorted in a group in a meaningful order, and the value that is found by averaging the group herein is written on the field of related data, so that anonymising is completed.
- **Exchange of data:** In this method, the valuations of a parameter among the pair picked in the stored data are exchange each other.

In the case of situations indicated above, required all organisational and technical measures are taken and the compliance with the Law, the by-law and other related laws for the purpose of protection of personal data, is ensured.

8. The Period of Periodical Disposal of Personal Data

The personal data held by Er-Kim will be periodical reviewed and those of personal data herein whose condition to process is completely no longer exist will be erased, destructed or anonymised.

This periodical reviewing and disposal process appear in the Personal data Processing Inventory which is/will be presented to the VERBIS system.

9. The Period of Erasure, Destruction or Anonymising of Personal Data on Its Own Motion

Your personal data will be erased, destructed or anonymised at the first periodic disposal process following the date when the obligation to erase, destruct or anonymise personal data is occurred. However, it will not exceed 6 months.

In the fact that the damage which is unrecoverable or hard to recover is occurred and it is clearly illegal, the Board can shorten the period in question.

10. The Period of Erasure, Destruction or Anonymising of Personal Data upon the Data Subject's Demand

The Data Subject delivers his/her demand to Er-Kim either in written form or other way the Board will determine. Er-Kim may accept the demand or refused it with the explanation of the reason and deliver the response in maximum 30 days either in written form or electronically. In the act of accepting the demand, the Company will fulfil the demand.

If the conditions for processing of personal data related with the demand, are no longer exist, the personal data related with the demand is either erased, destructed or anonymised. Depending on the content of the demand, it will be completed in maximum 30 days with no charge. However, if the process requires extra expenses, the fee in the tariff determined by the Board may come into question. If the expenses occurs because of the Company's fault, the fee received is refunded.

Unless otherwise stated by the Board, the way to erase, destruct or anonymise personal data on its own motion will be preferred by Er-Kim. In the case of related person's demand, Er-Kim choose the way with the explanation of the reason.

In the case that the personal data related with the demand has been transferred to the third person, Er-Kim will notify the third person and ensure the necessary process will be completed.

You can make an application about processing of your personal data, either via the form available in the Company's website or in written form to the address indicated below.

Contact Information of Er-Kim İlaç Sanayi ve Ticaret A.Ş.

Contact E-mail Address: kvkk@erkim-ilac.com.tr

Central Office address: Levazım Mah. Koru Sok. No:2 Zorlu Center D Blok T-3 Katı D:344
Beşiktaş/İstanbul

The website address for communication: <http://www.erkim-ilac.com.tr/>

**In the case of application in written form, please specify that “it is the information demand in the context of the Law on Personal Data Protection”*