



**DOKU TURİZM OTELCİLİK İNŞAAT SAĞLIK TARIM
GIDA YATIRIMLARI ANONİM ŞİRKETİ**

**PERSONAL DATA STORAGE AND
DISPOSAL POLICY**

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I. INTRODUCTION

1. 1. The Purpose of the Storage and Disposal Policy

This Personal Data Storage and Disposal Policy (“Policy”) is a work related to the storage and disposal activities carried out by Doku Turizm Otelcilik İnşaat Sağlık Tarım Gıda yatırımları anonim şirketi (“Mylome Luxury Hotel & Resort” or the “Company”) in accordance with the Law on the Protection of Personal Data No. 6698 (“KVKK” /“Law”) and the Regulation on the Deletion, Disposal or Anonymization of Personal Data, which was published in the Official Gazette dated October 28, 2017, which constitutes a secondary regulation of the Law (“Regulation”) and it has been prepared in order to determine the procedures and principles to be applied in the field of transactions.

1.2. Scope

In this context, the personal data of all real persons of our employees, employee candidates, guests, visitors and suppliers, who have personal data at Mylome Luxury Hotel & Resort for any reason, are managed in accordance with the laws within the framework of the Personal Data Processing and Protection Policy and this Personal Data Storage and Disposal Policy. This Policy is applied in all recording environments where personal data is processed and in activities related to personal data processing.

1.3. Definitions

Recipient group: The category of natural or legal person to whom personal data is transferred by the data controller,

Explicit Consent: Consent related to a specific subject, based on information and explained by free will,

Relevant User: Except for the person or unit responsible for the technical storage, protection and backup of the data, the persons who process the personal data within the data controller organization or in accordance with the authority and instructions received from the data controller,

Disposal: Deletion, disposal or anonymization of personal data,

Recording Medium: Any medium containing personal data that is fully or partially automated or processed by non-automatic means, provided that it is a part of any data recording system,

Personal Data: Any information relating to an identified or identifiable natural person,

Processing of Personal Data: Any kind of action on data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classification or prevention of usage of personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system.

Anonymization: Making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching with other data,

Deletion of Personal Data: Deletion of personal data; making personal data inaccessible and unusable for Relevant Users in any way,

Disposal of Personal Data: The process of making personal data inaccessible, unrecoverable and unusable by anyone in any way.

Board: Personal Data Protection Board,

Periodic Disposal: In the event that all of the conditions for processing personal data contained in the Law disappear, the deletion, disposal or anonymization of personal data will be carried out ex officio at repeated intervals specified in the retention and disposal policy,

Data Owner / Concerned Person: The real person whose personal data is processed,

Regulation: The Regulation on the Deletion, disposal or Anonymization of Personal Data published in the Official Gazette dated 28.10.2017 and numbered 30224

1.4. Principles

The following basic principles have been adopted by our Company for the storage and disposal of personal data.

1- According to articles 5 and 6 of the Law, in the event that all of the conditions for processing the personal data contained in the articles disappear, the personal data are deleted, destroyed or anonymized by our Company ex officio or upon the request of the data owner. Upon receipt of the request of data owners to our Company;

a) If all the conditions for processing personal data have disappeared, the personal data subject to the request are deleted, destroyed or anonymized. In this way, the Data Owner's request is finalized within thirty (30) days at the latest and information is provided.

b) If all the conditions for processing personal data have disappeared however the personal data subject to the Data Owner's request has been shared with third parties, the request directed to our Company is notified to the third party to whom the data has been shared and the necessary actions are requested to be taken by the third party within the framework of this Policy and legislation.

c) If all the conditions for processing personal data have not disappeared, such request is rejected by providing reasoned information about the situation in question, according to

Article 13 of the Law. In such a case, our rejection response is notified to the Data Owner in writing or electronically no later than thirty (30) days.

2- Deletion, disposal and anonymization of Personal Data are implemented in accordance with the provisions of the relevant legislation, the decisions of the Board and also this Policy with relevant technical and administrative measures listed in articles 12 and 4 of the Law. According to article 4 of the Law;

- a) Compliance with the law and the rule of honesty,
- b) Accuracy and timeliness,
- c) Processing for specificity, clarity and legitimate purposes,
- d) Being connected, limited and restrained with the purposes for which they are processed,
- e) And the principles of storage for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed are the priorities for our Company.

In parallel with article 12 of the Law, our Company takes technical and administrative measures for;

- a) Preventing the unlawful processing of personal data,
- b) Preventing unlawful access to personal data,
- c) Ensuring the preservation of personal data,

as stipulated in this Policy to ensure appropriate security level.

3- All actions related to the deletion, disposal, anonymization of personal data are recorded by our Company and these records are stored for at least three (3) years, except for other legal obligations that our Company must comply with.

4- Unless a contrary decision is taken by the Personal Data Protection Authority, the appropriate method of deleting, destroying or anonymizing personal data is chosen by the COMPANY. However, if requested by the Data Owner, the appropriate method will be selected by explaining the reason, or the necessary feedback will be provided to the Data Owner regarding why it could not be selected.

II. RECORDING MEDIUM and SECURITY MEASURES

2.1. Recording Medium for Personal Data

Personal data stored at Mylome Luxury Hotel & Resort are kept in a recording environment in accordance with the nature of the data and our legal obligations.

The recording media used for the storage of personal data are generally listed below. However, some data may be kept in a different environment than the ones shown here, due to their special qualities or our legal obligations. In any case, Mylome Luxury Hotel & Resort acts as a data controller and processes and protects personal data in accordance with the Law, the Personal Data Processing and Protection Policy and this Personal Data Storage and Disposal Policy.

a) Non-Electronic Media	:	These are the mediums where data is kept by printing on paper.
b) Electronic Media	:	The servers located in the structure of Mylome Luxury Hotel & Resort are other digital media such as hard or portable disks, optical disks.

2.2. Spatial Security

Mylome Luxury Hotel & Resort takes all necessary technical and administrative measures in accordance with the characteristics of the relevant personal data and the environment in which it is kept, in order to keep personal data safe and to prevent unlawful processing and access.

2.2.1. Technical Measures

Mylome Luxury Hotel & Resort takes the following technical measures in accordance with the characteristics of all environments where personal data is stored and the environment in which data is kept:

- Network security and application security are provided.
- Security measures are taken within the scope of information technology systems procurement, development and maintenance.
- The security of the personal data stored in the cloud is ensured.
- Access logs are kept regularly.
- Corporate policies on access, information security, use, storage and disposal have been prepared and started to be implemented.
- Data masking measures are applied when necessary.
- Current anti-virus systems are used.
- Firewalls are used.
- The user account management and authorization control system are being implemented and their monitoring is also being carried out.
- Periodic and/or random internal audits are carried out and performed.

- Log records are kept in such a way that there is no user intervention.
- Intrusion detection and prevention systems are used.
- Cyber security measures have been taken and their implementation is constantly monitored.
- Encryption is provided. Firewalls are used.
- The personal data is backed up and the security of the backed up personal data is also ensured.

2.2.2. Administrative Measures

MyLome Luxury Hotel & Resort takes the following administrative measures in accordance with the characteristics of all environments where personal data is stored and the environment in which data is kept:

1. There are disciplinary regulations that contain data security provisions for employees.
2. Training and awareness-raising activities are carried out for employees on data security at certain intervals,
3. An authority matrix has been established for employees.
4. Confidentiality commitments are made.
5. The powers of employees who have changed their duties or have left their jobs in this area are being removed.
6. The signed contracts contain data security provisions.
7. Extra security measures are taken for the personal data transferred via paper and the relevant documents are sent in a confidentiality-grade document format.
8. Personal data security policies and procedures have been determined.
9. Personal data security issues are reported quickly.
10. Personal data security is being monitored.
11. Necessary security measures are taken regarding entry and exit to physical environments containing personal data.
12. The physical environments containing personal data are subject to external risks (fire, flood, etc.) counter security is provided.
13. The security of the environments containing personal data is ensured.
14. Personal data is reduced as much as possible.
15. The current risks and threats have been identified.
16. Regular audit of the service providers processing data is provided on the subject of data security at certain intervals.
17. Data processing service providers are provided with awareness about data security.

2.2.3. Internal Audit

Mylome Luxury Hotel & Resort conducts internal and external audits regarding the implementation of the provisions of the Law and the provisions of this Personal Data Storage and Disposal Policy and Personal Data Processing and Protection Policy in accordance with Article 12 of the Law.

If deficiencies or defects regarding the implementation of these provisions are detected as a result of internal and external audits, these deficiencies or faults are immediately corrected.

If it is understood that the personal data that is under the responsibility of Mylome Luxury Hotel & Resort has been obtained by others illegally during the audit or otherwise, Mylome Luxury Hotel & Resort notifies the relevant person and the Board as soon as possible.

II. STORAGE AND DISPOSAL OF PERSONAL DATA

3.1. Storage Purposes and Legal Reasons

Personal data is stored within the limits specified in the KVKK and other relevant legislation, especially for the purposes of (i) maintaining commercial activities, (ii) fulfilling legal obligations, (iii) planning and performing employee rights and ancillary rights, as well as creating a personal file (iv) managing guest relations, and (v) conducting finance and accounting affairs.

The main legislation related to our legal obligations is the Personal Data Protection Law No. 6698, the Turkish Code of Obligations No. 6098, the Turkish Commercial Code No. 6102, the Labor Law No. 4857, the Social Security and General Health Insurance Law No. 5510, the Occupational Health and Safety Law No. 6331, the Tax Procedure Law No. 213 and It is the Law No. 6502 on Consumer Protection.

The reasons that require storage are as follows.

- ✓ The personal data should be directly related to the establishment and execution of contracts,
- ✓ Personal data should be stored for the purpose of establishing, exercising or protecting a right,
- ✓ It should be mandatory that personal data is stored for the legitimate interests of Mylome Luxury Hotel & Resort, provided that it does not harm the fundamental rights and freedoms of persons,
- ✓ Personal data should be stored for the purpose of fulfilling any legal obligations of Mylome Luxury Hotel & Resort,
- ✓ The storage of personal data should be stipulated in the legislation clearly,

- ✓ Data owners should provide explicit consent in terms of storage activities that require the explicit consent of the data owners to be obtained.
- ✓ The concerned person should have made his/her own data public already.

3.2. Reasons for Disposal

In general;

- ✓ Amendment or relevance of the provisions of the relevant legislation that constitute the basis for its processing,
- ✓ Elimination of the purpose that requires processing or storage,
- ✓ In cases where the processing of personal data takes place only in accordance with the explicit consent condition, the withdrawal of the explicit consent of the person concerned,
- ✓ Acceptance of the application made by Mylome Luxury Hotel & Resort for the deletion and disposal of personal data within the framework of the rights of the concerned person in accordance with Article 11 of the law,
- ✓ If Mylome Luxury Hotel & Resort rejects the application made to it with the request of deletion, destruction or anonymization of personal data by the concerned person, finds the answer insufficient or does not respond within the time stipulated by the Law, he/she should file a complaint with the Board and this request is deemed appropriate by the Board,
- ✓ The maximum period of time requiring the storage of personal data has passed and there are no conditions justifying the storage of personal data for a longer period of time,

in abovementioned cases, such data are deleted or destroyed at the request of the concerned person or deleted and destroyed by Mylome Luxury Hotel & Resort ex officio.

3.2. Disposal Methods

Mylome Luxury Hotel & Resort ex officio deletes the personal data it has stored in accordance with the Law and other legislation and the Personal Data Processing and Protection Policy, upon the request of the person concerned or within the periods specified in this Personal Data Retention and Disposal Policy, in case the reasons requiring the processing of the data are eliminated.

The most commonly used deletion, destruction and anonymization techniques by Mylome Luxury Hotel & Resort are listed below:

3.2.1. Deletion Methods

Recording Medium	Deletion Method
Personal Data in Physical Medium :	For those whose period of time requires the storage of personal data stored in a physical environment has expired, it is made inaccessible and unusable again in any way for other employees, except for the unit manager responsible for the document archive. In addition, the obscuration process is also applied by drawing / painting/erasing in such a way that it cannot be read.
Personal Data in Electronic Medium :	The personal data contained in the electronic medium, which has expired to be stored, is made inaccessible and unusable again in any way for other employees (relevant users), except for the database administrator.
Personal Data in Servers :	The system administrator cancels the access rights of relevant users for the data in servers whose storage period has expired, and deletes them.
Personal Data Contained in Portable Media :	The system administrator encrypts the data in flash storage devices, whose storage period has expired, and grants access to them only by the system admin and keeps them in safe medium with encryption keys.

3.2.2. Disposal Methods

Recording Medium	Disposal Method
Personal Data in Physical Medium :	Documents kept in printed media are destroyed in a way that they cannot be reassembled with document shredders.
Personal Data in Optical/Magnetic Media :	This is the physical destruction of optical and magnetic media containing personal data, such as melting, burning or pulverizing. Data is rendered inaccessible by processes such as melting, incinerating, pulverizing, or passing optical or magnetic media through a metal grinder.

3.2.3. Anonymization Methods

This is making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching with other data,

In order for the personal data to be anonymized, the personal data must be returned by the data controller or third parties and /or the matching of the data with other data, even through the use of appropriate techniques in terms of the recording environment and the relevant field of activity, so that it cannot be associated with an identified or identifiable real person.

IV. STORAGE AND DISPOSAL PERIODS

4.1. Storage Periods

DATA OWNER	DATA CATEGORY	STORAGE PERIOD ¹
Employees	Personal data such as service duration and salary as well as other information in the personal holder as registered with the Social Security Authority	Kept for a period of 10 (ten) years from the termination of the service contract.
Employee Candidates	The data contained in the Employee Candidate's resume and job application form	Kept until the resume is no longer up to date but for a maximum of 1 year.
Supplier Representatives/Managers/Employees	Identity, contact, professional experience and financial data	Kept for 10 years during and after the business/commercial relationship with Mylome Luxury Hotel & Resort pursuant to Turkish Code of Obligations Art.146 and Turkish Commercial Code Art.82.
Supplier Representatives/Employees	Identity, contact, professional experience and health data obtained within the scope of occupational health and safety legislation	15 Years from the termination of the employment contract in accordance with the Occupational Health and Safety Law No. 6331 and the Occupational Health and Safety Services Regulation
Visitors	Camera recordings taken at the entrance to the physical space of Mylome Luxury Hotel & Resort	Kept for 30 days.
Website Visitors	Cookie records are kept within the scope of the permissions obtained from the visitors who log in to the website.	Kept for 2 years.

4.2. Disposal Periods

Mylome Luxury Hotel & Resort deletes, destroys or anonymizes personal data in the first periodic destruction process following the date of occurrence of the obligation to delete,

¹ The time periods stipulated in the legislation are accepted as the maximum storage period unless there is a longer period mentioned in the legislation or there is a longer period for lapse of time, foreclosure, storage period, etc. in the laws.

destroy or anonymize the personal data for which it is responsible in accordance with the Law, relevant legislation, the Personal Data Processing and Protection Policy and this Personal Data Storage and Disposal Policy.

When the concerned person applies to Mylome Luxury Hotel & Resort in accordance with Article 13 of the Law and requests the deletion or destruction of his/her personal data;

1. If all the conditions for processing personal data have disappeared; Mylome Luxury Hotel & Resort deletes, destroys or anonymizes the personal data subject to the request by explaining its justification within 30 (thirty) days from the day it receives the request, using the appropriate method of destruction. In order for Mylome Luxury Hotel & Resort to be considered as having received the request, the concerned person must have made the request in accordance with the Personal Data Processing and Protection Policy. Mylome Luxury Hotel & Resort provides information to the person about the action taken in any case.

2. If all the conditions for processing personal data have not been eliminated, this request may be rejected by Mylome Luxury Hotel & Resort by explaining the justification in accordance with the third paragraph of Article 13 of the Law, and the rejection response will be notified to the relevant person in writing or electronically no later than thirty days.

4.4. Periodic Disposal

In case all of the conditions for processing personal data contained in the law disappear, Mylome Luxury Hotel & Resort deletes, destroys or anonymizes the personal data whose processing conditions have disappeared by a process specified in this Personal Data Storage and Disposal Policy to be performed on regular intervals ex officio.

Periodic disposal processes start for the first time on **15.10.2023** and repeats **in April and October every 6 (six) months**.

4.5. Supervision of the Legal Compliance of the Disposal Process

Mylome Luxury Hotel & Resort performs the destruction operations performed either ex officio or at request and during periodic destruction processes in accordance with the Law, other legislation, the Personal Data Processing and Protection Policy and this Personal Data Storage and Disposal Policy. Mylome Luxury Hotel & Resort takes a number of administrative and technical measures to ensure that the destruction operations are carried out in accordance with these regulations.

4.5.1. Technical Measures

- Mylome Luxury Hotel & Resort has technical tools and equipment suitable for each destruction method contained in this policy.

- Mylome Luxury Hotel & Resort ensures the security of the place where the destruction operations are carried out.
- Mylome Luxury Hotel & Resort keeps access records of the people who made the destruction process.
- Mylome Luxury Hotel & Resort employs competent and experienced personnel who will perform the destruction process or receives services from competent third parties when necessary.

4.5.2. Administrative Measures

- Mylome Luxury Hotel & Resort makes efforts to increase and raise awareness of information security, personal data and privacy issues of its employees who will perform the destruction process.
- Mylome Luxury Hotel & Resort receives legal and technical consultancy services in order to follow the developments in the field of information security, privacy of private life, protection of personal data and secure destruction techniques and to take the necessary actions.
- Mylome Luxury Hotel & Resort signs protocols with the relevant third parties for the protection of personal data in cases where the destruction process is performed by third parties due to technical or legal requirements, and takes all necessary care to comply with the obligations of the relevant third parties in these protocols.
- Mylome Luxury Hotel & Resort regularly checks whether the destruction operations are carried out in accordance with the law and the terms and obligations set out in this Personal Data Storage and Disposal Policy, and takes the necessary actions.
- Mylome Luxury Hotel & Resort records all transactions related to the deletion, destruction and anonymization of personal data and stores these records for at least three years, except for other legal obligations.

V. SECTION: PERSONAL DATA WORKING COMMITTEE

Mylome Luxury Hotel & Resort establishes a Personal Data Working Committee. The Personal Data Working Committee is authorized and responsible for performing / having performed the necessary operations for the storage and processing of the data of the relevant persons in accordance with the law, the Personal Data Processing and Protection Policy and the Personal Data Storage and Disposal Policy, and supervising the processes.

The Personal Data Working Committee consists of four people, including an administrator and three administrative specialists (human resources, quality management and information processing). If necessary, technical knowledge and experience will be provided by obtaining

services from outside the Company. The titles and job descriptions of the Mylome Luxury Hotel & Resort employees working in the Personal Data Working Committee are stated below:

Title	Terms of Reference
Director of the Personal Data Working Committee	The director is obliged to lead all kinds of planning, analysis, research, risk determination studies in the projects carried out during the compliance process with the Law and to manage the processes that must be carried out in accordance with the Law, the Personal Data Processing and Protection Policy and the Personal Data Storage and Disposal Policy, and to decide on the requests received by the relevant persons.
KVK Specialist (Human Resources, Quality Management and IT)	This specialist is responsible for the examination and evaluation of the requests of the relevant persons and reporting them to the Manager of the Personal Data Monitoring Committee; for the execution of the procedures related to the requests of the relevant persons evaluated and decided by the Manager of the Personal Data Monitoring Committee in accordance with the decision of the Manager of the Personal Data Monitoring Committee; for the supervision of the storage and destruction processes and the reporting of these audits to the Manager of the Personal Data Monitoring Committee; for the execution of the storage and destruction processes.

V. UPDATING AND COMPLIANCE

Mylome Luxury Hotel & Resort reserves the right to make changes to the Personal Data Processing and Protection Policy or this Personal Data Storage and Disposal Policy due to changes made in the Law, in accordance with Corporate decisions or in line with developments in the sector or in the field of informatics.

The changes made to this Personal Data Storage and Disposal Policy are immediately processed into the text and the explanations related to the changes are explained at the end of the policy.

5.1 Notes of Amendments

LAST UPDATE	SCOPE OF AMENDMENT
01/03/2023	The Personal Data Storage and Disposal Policy has been published.