

**PERSONAL DATA
PROCESSING,
PROTECTION, STORAGE
AND DISPOSAL
POLICY**

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1. INTRODUCTION

Turkey Republic Constitution Article 20 according to (<https://www.anayasa.gov.tr/tr/mevzuat/anayasa/>), everyone has the right to request the protection of personal data about themselves. This right includes being informed about personal data about oneself, accessing this data, requesting its correction or deletion, and learning whether it is used for its purposes.

Within the scope of the exercise of the constitutional right in question, the Personal Data Protection Law No. 6698 ("KVKK"), which regulates the protection of the fundamental rights and freedoms of individuals in the processing of personal data, the obligations of real and legal persons who process personal data, and the procedures and principles to be followed, has been published and entered into force. ("VOLİ") shows due diligence in compliance with the KVKK and makes this a company policy with this Personal Data Protection and Processing Policy ("Policy").

The subject of Politics; The protection of personal data belonging to Employee Candidates, Employees, Dealers, Suppliers, Contractors, Visitors, Employees of the Institutions We Cooperate with, Customers and Third Parties (Guarantor, Victim/Right Holder) by "VOLİ". The activities carried out regarding the protection of the personal data of our employees are managed within the framework of **the disciplinary** regulation carried out within the scope of VOLİ, Information Security Management System, personnel explicit consent, personnel confidentiality procedures, and supplier confidentiality agreements.

2. PURPOSE

The purpose of this Policy is to make explanations about the personal data processing activities carried out by VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ in accordance with the KVKK and the principles adopted for the protection of personal data, and in this context, to provide personal data to Employee Candidates, Dealers, Suppliers, Contractors, Visitors, Employees of the Institution We Cooperate with, Customers, and Third Parties with rights. To ensure transparency by informing the persons processed by VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ.

3. SCOPE

Data subjects whose personal data are processed within the scope of this Policy are categorized as follows:

Employee Candidates	VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ either by applying for a job or by any other means making their CV and related information accessible to VOLİ
Employees of the Institutions We Cooperate with	Employees of institutions that have a business relationship with VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ
Dealer	Real and legal persons who make it a profession to mediate the sale of products on behalf and account of VOLİ on a permanent basis in a certain place or region based on a contract with VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ and to do these on behalf of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ , to carry out the preparatory work before the conclusion of the contract and to assist in the implementation of the contract.
Suppliers	Legal and real persons (within the scope of Supplier Confidentiality Agreements) to whom the planned purchases will be made at VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ or its dealers.
Contractors	Legal and natural persons who undertake to carry out a work related to construction or trade on behalf of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ or its dealers.
Customers	Regardless of whether there is any contractual relationship or not, by VOLİ real persons whose personal data are obtained due to business relations within the scope of the activities carried out
Visitors	Real persons who have entered the physical facilities of VOLİ for various purposes or visited its websites

Third Parties	Although it is not defined in the Policy, personal data within the framework of this Policy other natural persons, including but not limited to the supplier, guarantor, victim/beneficiary, family members, etc.
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4. DEFINITIONS

The definitions used in this Policy are as follows:

Explicit Consent	Consent regarding a specific subject, based on information and expressed with free will
Employees	All real persons who work for a definite or indefinite period of time as dependent on VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ
Employee Candidate	Real persons who make their CV and related information accessible to VOLİ by applying for a job at VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ or by any other means
Employee Data Subject Application Form	Application form that VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ employees will benefit from when using their applications regarding their rights described in Article 11 of the KVK Law as personal data owners
Relevant User	Persons who process personal data within the data controller organization or in line 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.
Personal Health Data	Any health information related to an identified or identifiable natural person
Personal Data	Any information relating to an identified or identifiable natural person
Processing of Personal Data	Any operation performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or non-automatic means provided that it is a part of any data recording system
KVK Law	Law No. 6698 on the Protection of Personal Data
KVK Board	Personal Data Protection Board
KVK Institution	Personal Data Protection Authority
Special Categories of Personal Data	Data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data of individuals
TCK	Turkish Penal Code No. 5237
Data Processor	A natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller
Personal Data Owner	The real person whose personal data is processed, who is considered as the "relevant person" in the KVK Law
Personal Data Owner Application Form	The application form to be used by the personal data owners whose personal data are processed within VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ while using their applications regarding their rights described in Article 11 of the KVK Law
Personal Data Deletion	Deletion of personal data is the process of making personal data inaccessible and unusable for the relevant users in any way.

Destruction of Personal Data	Destruction of personal data is the process of making personal data inaccessible, irrecoverable and unusable by anyone in any way.
Anonymization of Personal Data	Anonymization of personal data is the rendering of personal data that cannot be associated with an identified or identifiable natural person in any way, even if it is matched with other data
Data controller	A 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
Visitors	Real persons who have entered the physical facilities of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ for various purposes or visited its websites
Data Controllers Registry	Data controllers' registry kept by the Personal Data Protection Board
Data Inventory	The personal data processing activities carried out by VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ depending on its business processes; the inventory created and detailed by associating it with the purposes of personal data processing, the recipient group to whom the personal data is transferred and the relevant personal data owner group

5. GENERAL PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Pursuant to Article 3 of the KVKK, all kinds of operations performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially non-automatic and/or automatic means fall within the scope of personal data processing.

The following principles must be complied with in the processing of personal data:

5.1. Compliance with the Law and Honesty Rules

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ personal data processing activities; **Compliance with Legal Requirements and Control Procedure**,

It carries out in accordance with the Constitution of the Republic of Turkey, KVKK, relevant legislation and honesty rules.

5.2. Being Accurate and Up-to-Date When Necessary

While carrying out the processing of personal data, all kinds of administrative and technical measures to ensure the accuracy and up-to-dateness of personal data **are taken by VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ**.

5.3. Processing for Specific, Clear and Legitimate Purposes

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ clearly and precisely determines the purpose of personal data processing before starting the activity of processing personal data.

5.4. Being Relevant, Limited and Proportionate to the Purpose for which they are Processed

Personal data is processed by **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** for specific, clear and legitimate purposes to the extent necessary in connection with the relevant purpose. Data processing activities are not carried out with the assumption that it can be used later.

5.5. Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ stores personal data for a limited period of time stipulated in the KVK Law and relevant legislation or required by the purposes related to data processing activities.

6. PROCESSING OF PERSONAL DATA

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ carries out its personal data and sensitive personal data processing activities in accordance with the data processing conditions set forth in Articles 5 and 6 of the KVKK.

6.1. Conditions for Processing Personal Data

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ may process personal data with the explicit consent of the personal data owner or without explicit consent in the cases stipulated in Article 5 of the KVK Law and listed below:

- It is clearly stipulated in the laws.
- It is necessary for the protection of the life or bodily integrity of the person who is unable to express his/her consent due to actual impossibility or whose consent is not legally valid.
- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract.
- It is mandatory for VOLİ to fulfill its legal obligation.
- It has been made public by the personal data owner himself.
- Data processing is mandatory for the establishment, exercise or protection of a right.
- Provided that it does not harm the fundamental rights and freedoms of the personal data owner, **data processing is mandatory for the legitimate interests of VOLİ.**

6.2. Processing of Special Categories of Personal Data

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ carries out the processing of special categories of personal data, which carry the risk of discrimination when processed unlawfully, in accordance with the data processing conditions set forth in Article 6 of the KVK Law.

It is prohibited to process special categories of personal data without the explicit consent of the personal data owner. However, personal data other than health and sexual life are collected in cases stipulated by law; personal data related to health and sexual life can only be processed by persons under the obligation of secrecy or authorized institutions and organizations for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the data subject.

Measures determined by the KVK Board for special categories of personal data processing activities
VOLİ

It is effectively implemented by the

6.3. Categorization Regarding Personal Data Processed by Our

Company Categories of Personal Data Processed by VOLİ FUAR

HİZMETLERİ ANONİM ŞİRKETİ

Personal Data Category	Description	Data Subject Category to which the Relevant Personal Data Is Related
Credential	Provided that it is not limited to name-surname, TR Identity number, nationality information, mother's and father's name, place of birth, date of birth, gender and SSI number; in documents such as driver's license, identity card, residence All information	Customers, Third, People, Suppliers, Visitors, Employee Candidates, Employees of the Institutions We Cooperate With
Contact Information	Information such as phone number, address, e-mail, fax number	Customers, Employee Candidates, Visitors, Suppliers

Customer Information	As a result of our commercial activities and the operations carried out by our business units within this framework, the information obtained about the relevant person and the information generated	Customers
Customer Transaction Information	For the use of our products and services records and the information such as instructions and requests	Customers
Transaction Security Information	Execution of commercial activities of VOLİ processed to ensure technical, administrative, legal and commercial security during Personal Data	Customers, Visitors, Suppliers
Risk Management Knowledge	In order for us to manage our commercial, technical and administrative risks, we use it in accordance with generally accepted legal, commercial practices and honesty rules in these areas. Personal data processed through methods	Customers, Visitors, Suppliers, Prospective Employees, Employees
Financial Information	Information, documents and documents showing all kinds of financial results created according to the type of legal relationship established with the personal data owner Personal data processed regarding records	Customers, Suppliers, Dealers
Employee Candidate Information	Committed in relation to individuals who have applied to be an employee of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ or who have been evaluated as an employee candidate in line with the human values needs of VOLİ in accordance with commercial practices and honesty rules, or who are in a working relationship with VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ . personal data.	Employee Candidates
Legal Process and Compliance Information	Within the scope of the determination and follow-up of our legal receivables and rights and the performance of our debts Processed personal data	Customers, Employee Candidates, Suppliers, Third Parties
Audit, Inspection and Compliance Information	Legal obligations of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ and personal data processed within the scope of compliance with company policies	Customers, Prospective Employees, Visitors, Suppliers
Special Categories of Personal Data	As stated in Article 6 of the KVK Law; data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data of individuals data,	Customers, Prospective Employees, Third Parties, and Employees of the Institutions We Cooperate With
Marketing Information	As a result of the personal data processed for the customization and marketing of our products and services in line with the usage habits, tastes and needs of the personal data owner and the results of this processing Reports and evaluations created	Customers
Request / Complaint Management	Any information directed to VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ personal data regarding the receipt and evaluation of all kinds of requests or complaints.	Customers, Employee Candidates

Information		
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7. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

In accordance with Article 12 of the KVK Law, VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ takes all necessary technical and administrative measures to ensure that the personal data it processes are processed and preserved in accordance with the law and to prevent unlawful access to the personal data in question.

The Company's KVKK unit, which undertakes the corporate compliance function, is responsible for the internal coordination of the activities within the framework of the KVK Law as a whole within the framework of this policy. In this context, the unit in question;

- Submitting this policy to the approval of the Board of Directors within the scope of following up and updating it when necessary,
- Establishing other policies and procedures other than this policy regarding the protection, processing and destruction of personal data in coordination with the relevant Company units,
- Distributing the necessary duties for the implementation of policies and procedures and submitting them to the approval of the senior management,
- Monitoring the implementation of all kinds of technical and administrative measures taken in accordance with Article 12 of the Law and planning their supervision,
- To follow up the processes related to the applications and requests made by personal data owners and to provide the necessary coordination for the solution of problems that may arise,
- Determining the issues that need to be done to ensure compliance with the KVK Law and relevant legislation and supervising their implementation,
- It is authorized and responsible for the conduct of relations with the Personal Data Protection Board.

7.1. Technical Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access

All kinds of technical security measures have been taken to protect personal data and an adequate level of protection has been provided against possible risks. The main technical measures taken are listed below.

- **Authorization and access controls are periodically applied on the systems that provide access to personal data within VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ.**
- The technical measures taken are also observed within the scope of risk management, internal control and internal audit processes, regardless of executive activities.
- Personnel with sufficient expertise level are employed.

7.2. Administrative Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access

- **Employees of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** comply with the KVKK Law are trained and raised awareness on the subject.
- In cases where personal data transfer is in question, general conditions containing the obligations to be fulfilled for the security of personal data in accordance with the KVKK Law are established with the parties to whom personal data is transferred, and these are signed on the basis of the other party.
- In order to meet the requirements determined for compliance with the KVKK Law, implementation rules are determined on the basis of business units, and the necessary administrative measures to ensure their continuity are provided through internal procedures and trainings.
- **Except for the instructions of VOLİ and the exceptions introduced by the Law, records that impose the obligation not to process, disclose and use personal data are included in the**

contracts and documents governing the legal relationship between **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** and the counterparties, awareness of the employees is created and audits are carried out.

7.3. Measures to be Taken in Case of Unlawful Disclosure of Personal Data

In the event that personal data processed within the framework of the requirements for compliance with the KVKK Law is obtained by others illegally, an internal procedure has been developed to ensure that this situation is notified to the relevant data owner and the KVKK Board as soon as possible.

8. PURPOSES OF PROCESSING PERSONAL DATA AND RETENTION PERIODS

8.1 Purposes of Processing Personal Data

Personal data are processed by VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ within the framework of the following purposes:

- Managing goods/services after-sales support processes,
- Receiving and evaluating suggestions for the improvement of business processes,
- Execution of customer relationship management processes,
- Carrying out activities for customer satisfaction,
- Carrying out the marketing processes of products / services,
- Execution of advertising / campaign / promotion processes
- Planning and execution of our company's commercial and/or business strategies,
- Execution of Finance and Accounting Affairs
- Follow-up and Execution of Legal Affairs
- Execution of Logistics Activities
- Execution of Goods / Services Procurement Processes
- Execution of Goods / Services After-Sales Support Services
- Execution of Goods / Services Sales Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Customer Relationship Management Processes
- Execution of Contract Processes
- Execution of Strategic Planning Activities
- Conducting Marketing Analysis Studies
- Execution of Activities for Customer Satisfaction
- Execution of Customer Relationship Management Processes
- Execution of Wage Policy

8.2 Retention Periods of Personal Data

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ determines whether a certain period is stipulated in the relevant legislation for the storage of personal data, in accordance with Article 138 of the Turkish Penal Code and Articles 4 and 7 of the KVKK Law; ensures that the processed personal data is stored only for a period stipulated in the relevant legislation, or for the period required by the purpose of personal data processing if a period is not stipulated in the relevant legislation.

9. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

If the purpose of processing personal data has expired and the retention periods determined by the relevant legislation and/or **VOLİ** have expired, personal data are deleted, destroyed or anonymized by **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** upon the request of the data owner or ex officio

The procedures and principles regarding this issue have been determined within the framework of the provisions of the KVK Law and the Regulation on the Deletion, Destruction or Anonymization of Personal Data.

9.1. Techniques for Deletion and Destruction of Personal Data

It is essential to delete and destroy personal data by methods appropriate to recording media. The deletion or destruction techniques that are likely to be used by **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** regarding the techniques of deletion and destruction of personal data are listed below:

9.1.1. Physical Disposal

Personal data can also be processed by non-automatic means, provided that it is a part of any data recording system. When deleting/destroying such data, a system of physical destruction of personal data is applied in a way that cannot be used later.

9.1.2. Secure Deletion/Destruction from Software

While deleting/destroying data processed by fully or partially automatic means and stored in digital media; Methods are used to delete the data from the relevant software in a way that cannot be recovered by certain people or in any way.

9.1.3. Secure Deletion/Destruction by Expert

In some cases , **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** may agree with an expert to delete/destroy personal data on its behalf. In this case, personal data is securely deleted/destroyed by the person who is an expert in this field in a way that cannot be recovered again.

9.2. Techniques for Anonymizing Personal Data

Anonymization of personal data refers to the rendering of Personal Data in a way that cannot be associated with an identified or identifiable natural person in any way, even by matching it with other data.

In accordance with Article 28 of the KVKK Law; anonymized personal data can be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the KVKK Law and the explicit consent of the personal data owner will not be sought. Since the personal data processed by anonymization will be outside the scope of the KVKK Law, Article 12 of this Policy. The rights set out in this section will not apply to this data. **The most likely anonymization techniques to be used by VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** are listed below.

9.2.1. Masking

Data masking is a method of anonymizing personal data by removing the basic determining information of personal data from the data set.

9.2.2. Consolidation

With the data aggregation method, many data are aggregated and personal data can be collected with any person.

It is made unassociable.

9.2.3. Data Derivation

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

9.2.4. Data Hashing

With the data mixing method, the values in the personal data set are mixed and the link between the values and the people is broken.

10. THIRD PARTIES TO WHOM PERSONAL DATA IS TRANSFERRED AND TRANSFER PURPOSES

The procedures and principles to be applied in personal data transfers are regulated in Articles 8 and 9 of the KVKK Law. In order to perform the services provided by VOLİ, personal data is processed within the framework of the provisions of the Labor Law, Occupational Health and Safety Law, Law No. 6502 on the Protection of the Consumer and other regulations related to these laws, regulations of supervisory and regulatory institutions and organizations, and cases required by public authorities,

including but not limited to the provisions of the Labor Law, to real persons or private law legal entities, It can be transferred to our business partners, subsidiaries and subsidiaries, organizations from which we receive information technology support, and authorized public institutions and persons.

It is not possible to transfer personal data without the explicit consent of the personal data owner, except for the exceptional cases specified in the KVKK Law.

10.1. Domestic Transfer of Personal Data

In accordance with Article 8 of the KVKK Law, domestic transfer of personal data is possible provided that one of the conditions specified in section 6.1 of this Policy titled "Conditions for Processing Personal Data" is met.

10.2. Transfer of Personal Data Abroad

Pursuant to Article 9 of the KVKK Law, in case personal data is transferred abroad, in addition to meeting the conditions for domestic transfers, the existence of one of the following issues is sought:

- The country to be transferred is considered among the countries with adequate protection announced by the KVKK Board
- In the event that there is no adequate protection in the country to which the transfer will be made, the data controllers in Turkey and the relevant foreign country must undertake an adequate protection in writing and have the permission of the KVKK Board for this purpose.

10.3. Groups of Persons to Whom Personal Data Is Transferred by Our Company

VOLİ may transfer the personal data of personal data owners within the scope of this Policy to the following groups of persons within the framework of the specified purposes in accordance with Articles 8 and 9 of the KVKK Law and within the scope of this Policy:

PERSON GROUPS	DESCRIPTION	PURPOSE OF TRANSFER
Public Institutions and Organizations	In accordance with the provisions of the relevant legislation, the public institution requesting the information and documents of VOLİ and its organizations	Limited to the purpose requested by the relevant public institutions and organizations
Private Law Persons	In accordance with the provisions of the relevant legislation, private law persons with whom VOLİ shares information and documents	Within the framework of the provisions of the relevant legislation and in the areas where VOLİ operates, limited to the purpose of continuing its service

11. OUR COMPANY'S OBLIGATION TO INFORM

In accordance with Article 10 of the KVKK Law, VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ informs personal data owners during the collection of personal data. In this context, VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ fulfills its obligation to inform by providing the following information to personal data owners:

- Title of VOLİ as data controller
- For what purpose personal data will be processed
- To whom and for what purpose the processed personal data can be transferred
- Method and legal reason for collecting personal data
- Rights of the personal data owner

12. RIGHTS OF PERSONAL DATA OWNERS AND THE EXERCISE OF THESE RIGHTS

In accordance with Article 13 of the KVKK Law, if the personal data owners submit their requests

regarding their rights listed under the heading 12.1 of this section to VOLİ by filling out and signing the form by the methods specified below or by other methods determined by the KVKK Board, the request in question is concluded free of charge depending on the nature of the request.

After filling out the form on the corporate website (<https://voli.com.tr/>) of VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ;

A wet-signed copy must be delivered in person or through a notary public to the address of **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ YENİBOSNA MERKEZ MAHALLESİ LADİN SOKAK NO: 4M/1235 BAHÇELİEVLER İSTANBUL** or

- After being signed with a "secure electronic signature" within the scope of the Electronic Signature Law No. 5070, the form with a secure electronic signature must be sent to the cuneyt.er@voli.com.tr address by registered e-mail.

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ may request information from the relevant person in order to determine whether the applicant is the owner of personal data and may ask questions to the personal data owner about his/her application in order to clarify the issues in the application of the personal data owner.

12.1. Right to Application

Pursuant to Article 11 of the KVKK Law, personal data owners have the **right to make a request from VOLİ** regarding the following issues:

- To learn whether their personal data is processed,
- If their personal data has been processed, to request information about this,
- Personal data Processing Its purpose and Personal data To the purpose of Suitable to find out whether it is used or not,
- To learn the third parties to whom their personal data is transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made in this context to third parties to whom personal data has been transferred,
- To request the deletion, destruction or anonymization of personal data in case the reasons requiring the processing of personal data disappear and to request notification of the transaction made in this context to third parties to whom personal data has been transferred,
- To object to the emergence of a result against the data owner by analyzing the processed data exclusively through automated systems,
- To request compensation for the damage in case of damage due to unlawful processing of personal data.

12.2. Situations Outside the Scope of the Right to Apply

Pursuant to Article 28 of the KVKK Law, it is not possible for personal data owners to assert their right to apply, as the following situations are excluded from the scope of the KVKK Law:

- Processing personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or does not constitute a crime.

Pursuant to paragraph 2 of Article 28 of the KVKK Law, it is not possible for personal data owners to assert their rights in the following cases, except for the right to request compensation for damages:

- Processing of personal data is necessary for the prevention of committing a crime or for the investigation of a crime.
- Processing of personal data made public by the data subject himself/herself.

12.3. Response Procedure

In accordance with Article 13 of the KVKK Law, **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** concludes the application requests made by the personal data owner free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if

the transaction requires an additional cost, it is possible to charge the fee in the tariff determined by the KVKK Board.

VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ may accept the application request of the personal data owner, or reject it for the reasons listed below by explaining the reason and notify the relevant person in writing or electronically.

- Preventing the rights and freedoms of other people
- Requiring disproportionate effort
- The information is public information
- Compromise the privacy of others
- Existence of one of the situations that are not covered by the KVK Law

In cases where the personal data owner rejects his/her application, finds the answer given insufficient or does not respond to his/her application in due time, he/she has the right to file a complaint with the KVKK Board within thirty days from the date he/she learns the response of the data controller, and in any case within sixty days from the date of application.

13. PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT WITHIN THE COMPANY AND DATA PROCESSING ACTIVITIES CARRIED OUT ON THE WEBSITE

13.1. Camera Monitoring

Camera monitoring is carried out in the building where **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** Headquarters and Dealers are located.

In line with the regulations in the KVKK Law, a notification letter regarding the activities in question is hung at the entrances of the areas where camera monitoring is carried out by **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ** regarding the camera monitoring activity and the necessary information is provided on our website with this Policy.

There is no monitoring in areas that may result in interference with the privacy of the person. Only a limited number of Company employees and, if needed, security company employees who are suppliers can access the security camera recordings. The persons in question, who have access to the records, declare that they will protect the confidentiality of the data they access with the confidentiality undertaking they sign.

13.2. Customer Entrances and Exits Visiting the Company

Personal data processing activities are carried out to track the entry and exit of our guests visiting VOLİ. The identity information of the people coming to VOLİ is processed only for the purpose of tracking their entries and exits, and the relevant personal data is recorded in the registration system electronically.

13.3. Website Visitors

The internet movements of the people who visit the website of VOLİ are recorded in order to show them customized content and to carry out online advertising activities (by technical means, for example, cookies).

14. PERSONAL DATA STORAGE AND DESTRUCTION POLICY

14.1. Purpose of the Policy

The purpose of this policy; In order to fulfill the obligations regarding the storage and destruction of personal data and other obligations specified in the Regulation in accordance with Articles 5 and 6 of the Regulation on the Deletion, Destruction or Anonymization of Personal Data (Regulation), which was issued based on the Law No. 6698 on the Protection of Personal Data (Law) and published in the Official Gazette No. 30224 on 28.10.2017 To determine all the rules, roles and responsibilities to be applied throughout **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ**.

14.2. Scope of the Policy

The policy covers the personal data and special categories of personal data defined by Law No. 6698 held throughout (at **VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ**), all employees, managers, consultants and in all cases where personal data is shared, its affiliates, external service providers and other real and legal persons with whom **VOLİ** has entered into legal relations.

As specified in the Law, the Policy covers personal data in systems where data is processed by fully or partially automatic means or non-automatic means provided that it is a part of any data recording system.

Unless otherwise specified in this Policy, personal data and special categories of personal data will be generally referred to as "Personal Data".

14.3. Definitions

- **Anonymization:** Making personal data incapable of being associated with an identified or identifiable natural person in any way, even if it is matched with other data,
- **Destruction:** Deletion or destruction of personal data,
- **Personal Data:** Any information related to an identified or identifiable natural person,
- **Personal Data Retention Table (Periods):** The table showing the periods during which personal data **will be kept at VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ**,
- **Personal Data Processing Inventory:** The personal data processing activities carried out by data controllers depending on their business processes; they create by associating personal data with the purposes of processing personal data, data category, transferred recipient group and data subject group, and detail the maximum period required for the purposes for which personal data is processed, the personal data envisaged to be transferred to foreign countries and the measures taken regarding data security. inventory,
- **Deletion of Personal Data:** The process of making personal data inaccessible and unusable for the relevant users in any way,
- **Destruction of Personal Data:** The process of making personal data inaccessible, unrecoverable and unusable by anyone in any way,
- **Special Categories of Personal Data:** Data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data,
- **Periodic Destruction:** The process of deletion, destruction or anonymization to be carried out ex officio at repeated intervals and specified in the personal data storage and destruction policy in the event that all of the conditions for processing personal data in the law disappear,
- **Data Recording System:** The recording system in which personal data is structured and processed according to certain criteria,
- **Direct Identifiers:** Identifiers that directly reveal, disclose and distinguish the person they are in a relationship with,
- **Indirect Identifiers:** Identifiers that come together with other Identifiers to reveal, disclose and distinguish the person they are in a relationship with,
- **Law:** Law No. 6698 on the Protection of Personal Data published in the Official Gazette dated 07.04.2016 and numbered 29677,
- **Regulation:** The Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28.10.2017 and numbered 30224,
- **Board:** Personal Data Protection Board,
- **RECORDING ENVIRONMENT:** Any environment where personal data is processed by fully or partially automatic means or non-automatic means provided that it is a part of any data recording system,
- **Personal Data Protection and Processing Policy:** The [policy that determines the procedures and principles regarding the management of personal data in the possession of "VOLİ", which can be accessed](https://voli.com.tr/) <https://voli.com.tr/>,
- **Data Recording System:** The recording system in which personal data is structured and processed according to certain criteria,
Expresses.

14.4. Recording Environments Regulated by Policy

Any environment containing personal data that is fully or partially automatic or processed by non-automatic means, provided that it is a part of any data recording system, is within the scope of the recording environment.

14.4.1. Environments Where Personal Data Is Stored

The personal data stored at "VOLİ" are kept in a recording environment suitable for the nature of the relevant data and our legal obligations.

The recording media used for the storage of personal data are generally listed below. However, some data may be located and kept in a different environment than the environments shown here, due to their special characteristics or our legal obligations. "VOLİ" acts as the data controller and processes and protects in accordance with the KVK Law, Personal Data Protection, Processing, Storage and Destruction Policy.

a) Printed media	These are the environments where data is kept by printing on paper or microfilms.
b) Local digital environments	Servers within "VOLİ" are other digital media such as fixed or portable disks, optical discs.
c) Cloud environments	Although it is not included in the "VOLİ", it is the environments where internet-based systems encrypted with cryptographic methods are used, which are used by "VOLİ".

14.4.2. Securing Environments

"VOLİ" takes all necessary technical and administrative measures in accordance with the characteristics of the relevant personal data and the environment where it is kept in order to store the personal data securely and to prevent them from being processed and accessed unlawfully.

These measures include, but are not limited to, the following administrative and technical measures to the extent appropriate to the nature of the relevant personal data and the environment in which it is kept.

14.4.2.1. Technical Measures

"VOLİ" takes the following technical measures in accordance with the characteristics of all environments where personal data are stored, the relevant data and the environment where the data is kept:

- Only up-to-date and secure systems in accordance with technological developments are used in environments where personal data is kept, security systems are used for environments where personal data is kept.
- Security tests and researches are carried out to detect security vulnerabilities on information systems, and existing or potential risk issues identified as a result of the tests and researches are eliminated.
- By restricting access to data to the environments where personal data is kept, only authorized persons are allowed to access this data, limited to the purpose for which the personal data is stored.
- "VOLİ" has sufficient technical personnel to ensure the security of the environments where personal data is kept.

14.4.2.2. Administrative Measures

"VOLİ" takes the following administrative measures within the scope of the KVK Law in accordance with the characteristics of all environments where personal data is stored, the relevant data and the environment where the data is kept:

- Efforts are being made to raise awareness and raise awareness of all "VOLİ" **employees who have access to personal data** on information security, personal data and privacy of private life.
- Legal and technical consultancy services are received in order to follow the developments in the field of information security, privacy and protection of personal data and to take the necessary actions.
- In the event that personal data is transferred to third parties due to technical or legal

requirements, protocols are signed with the relevant third parties for the protection of personal data, and all necessary care is taken to ensure that the relevant third parties comply with their obligations in these protocols.

14.4.2.3. Internal Audit

Pursuant to Article 12 of the Law, "VOLI" conducts internal audits in accordance with the KVKK Law regarding the implementation of the provisions of the Law and the provisions of this Personal Data Protection, Processing, Storage and Destruction Policy.

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

In the event that it is understood that the personal data under the responsibility of "VOLI" has been obtained by others illegally **during the audit or in any other way**, "VOLI" shall notify the relevant person and the Board as soon as possible.

14.5. Duties and Powers of the Personal Data Protection Committee

The Personal Data Protection Committee is responsible for announcing the Policy to the relevant business units and monitoring the fulfillment of its requirements **by the "VOLI" units**.

The Personal Data Protection Committee makes the necessary announcements and notifications for the relevant business units to follow up on situations such as legislative changes regarding the protection of personal data, regulatory acts and decisions of the Board, court decisions or changes in processes, practices and systems, and to update their business processes if necessary,

Personal Data Protection Committee; It determines the processes for the examination, evaluation, follow-up and conclusion of the Law and its secondary regulations, the decisions and regulations of the Board, court decisions and the decisions and/or requests of other competent authorities and announces them to the relevant units.

14.6. What to Do in Case the Conditions for Processing Personal Data Disappear

In the event that the purpose element for the processing of personal data disappears, explicit consent is withdrawn, or all of the conditions for processing personal data in Articles 5 and 6 of the Law disappear, or there is a situation where none of the exceptions in the aforementioned articles can be applied, the personal data whose processing conditions are eliminated will be processed by the relevant business unit, taking into account the business needs, Within the scope of Articles 7, 8, 9 or 10 of the Regulation, the reason for the method applied is also explained, deleted, destroyed (destroyed) or anonymized. However, in case of a finalized court decision, the destruction method ruled by the court decision must be applied.

All users who process or store personal data and data owner "VOLI" units will review whether the conditions related to processing have disappeared in the data recording media they use within four months at the latest. Upon the application of the personal data owner or the notification of the Board or a court, the relevant users and units will conduct this review in the data recording media they use, regardless of the periodic audit period.

As a result of periodic reviews or when it is determined that the data processing conditions have disappeared at any time, the relevant user or data owner will decide to delete, destroy (destroy) or anonymize the relevant personal data from the recording environment under their responsibility in accordance with this policy. In case of doubt, action will be taken by taking the opinion of the relevant data owner business unit. When it is necessary to take a decision regarding the destruction of personal data with multi-stakeholder data ownership in Central Information Technologies, the opinion of the Personal Data Protection Committee will be taken and the relevant data owner business unit will decide whether the data will be stored or deleted, destroyed (destroyed) or anonymized in accordance with this policy regarding the personal data in question.

All transactions related to the deletion, destruction or anonymization of personal data are recorded and these records are kept for at least three years, excluding other legal obligations.

Pursuant to Article 7.4 of the Regulation, the methods applied for the deletion, destruction (destruction) and anonymization of personal data will be published and explained after the Policy comes into force.

In the deletion, destruction or anonymization of personal data, it is obligatory to act in accordance with the general principles in Article 4 of the Law and the technical and administrative measures to be taken within the scope of Article 12 of the Law, the provisions of the relevant legislation, Board decisions and court decisions.

When a natural person who is the owner of a personal data applies to "VOLİ" pursuant to Article 13 of the Law and requests the deletion, destruction or anonymization of his/her personal data, the relevant data owner business unit examines whether all the conditions for processing personal data have disappeared. If all processing conditions have disappeared; deletes, destroys or anonymizes the personal data subject to the request.

In this case, the details are as determined in the Data Destruction Procedure; the request is concluded within thirty days at the latest from the date of application and the relevant person is informed through the KVKK liaison officer appointed by the KVKK Officer. If all the conditions for processing personal data have disappeared and the personal data subject to the request has been transferred to third parties, the relevant data owner business unit immediately notifies the third party to whom the transfer is made and ensures that the necessary actions are taken by the third party within the scope of the Regulation.

In cases where all the conditions for processing personal data have not disappeared, the requests of personal data owners for the deletion or destruction of their data **will be made by "VOLİ"** in accordance with Article 13 of the Law.

Pursuant to paragraph 3, it can be rejected by explaining the reason. The rejection response is notified to the relevant person in writing or electronically within 30 days at the latest.

Requests for the deletion or destruction of personal data will only be evaluated provided that the identity of the person concerned has been determined. For requests to be made outside the said channels, the relevant persons will be directed to the channels where identification or verification can be made.

14.7. Policy Enforcement, Violations and Sanctions

This Policy will enter into force by being announced to all employees and personal data owners **on the "VOLİ"** website and will be binding for all business units, consultants, customers, insurance companies, external service providers and anyone else **who processes personal data before "VOLİ"** as of its effective date.

It will be the responsibility of the supervisors of the relevant employees to monitor whether the employees of "VOLİ" fulfill the requirements of the Policy. When a violation of the policy is detected, the issue will be immediately reported to a superior by the supervisor of the relevant employee. If the violation is significant, the Personal Data Protection Committee will be informed by the superior without delay.

Necessary administrative action will be taken against the employee who violates the policy after the evaluation to be made by the Human Values and Corporate Communications Directorate.

By "VOLİ" **in order to fulfill the policy requirements**; All necessary security measures are taken within the scope of KVKK Law.

14.8. Persons Who Will Take Part in Personal Data Storage and Destruction Processes and Their Responsibilities

In fulfilling the requirements regarding the destruction of data specified in the Law, Regulation and Policy in "VOLİ", all employees, customers, insurance companies, consultants, external service providers and everyone who stores and processes personal data at "VOLİ" in any other way are responsible for fulfilling these requirements.

Each business unit is obliged to store and protect the data it produces in its own business processes; However, if the data produced is only available in information technologies outside the control and authority of the business unit, the data in question will be stored by the units responsible for information technologies.

Periodic destructions that will affect business processes and cause deterioration of data integrity, data loss and results contrary to legal regulations will be carried out by the relevant information technology departments, taking into account the type of personal data concerned, the systems in which it is located and the data owner business unit.

14.8.1. Personal Data Protection Committee

It establishes a Personal Data Protection Committee within "VOLİ". The Personal Data Protection Committee is authorized and responsible for carrying out the necessary procedures and supervising the processes for the storage and processing of the data of the relevant persons in accordance with the law, the Personal Data Protection, Processing, Storage and Destruction Policy.

The Personal Data Protection Committee consists of at least three people, including a manager, an administrative expert and a technical expert. **The titles and job descriptions of the "VOLİ" employees working in the Personal Data Committee are as follows:**

Title	Job Description
Director of the Personal Data Protection Committee	To direct all kinds of planning, analysis, research and risk determination studies in projects carried out in the process of compliance with the law; It is obliged to manage the processes that must be carried out in accordance with the Law, Personal Data Protection, Processing, Storage and Destruction Policy and to decide on the requests received by the relevant persons.
KVK Specialist (Liaison Officer) (Technical and Administrative)	Examining the requests of the relevant persons and reporting them to the Personal Data Committee Manager for evaluation; Carrying out the procedures regarding the requests of the relevant person, which are evaluated and decided by the Personal Data Committee Manager, in accordance with the decision of the Personal Data Committee Manager; auditing the storage and destruction processes and reporting these audits to the Personal Data Committee Manager; It is responsible for the execution of storage and disposal processes.

14.8.2. Reasons for Storage and Disposal

14.8.2.1. Reasons for Storage

The **personal data kept within "VOLİ"** are stored in accordance with the Law and our Personal Data Policy (you can access the relevant policy at the "<https://voli.com.tr/>") address, for the purposes and reasons specified herein.

14.8.2.2. Causes of Destruction

The **personal data within the body of "VOLİ"** shall be deleted, destroyed (destroyed) or anonymized ex officio in accordance with this destruction policy upon the request of the relevant person or in the event that the reasons listed in Articles 5 and 6 of the Law disappear. The reasons listed in Articles 5 and 6 of the KVKK Law consist of the following:

1. It is clearly stipulated in the laws.
2. It is necessary for the protection of the life or bodily integrity of the person who is unable to express his/her consent due to actual impossibility or whose consent is not legally valid.
3. Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract.
4. It is mandatory for the data controller to fulfill its legal obligation.
5. It has been made public by the person concerned.
6. Data processing is mandatory for the establishment, exercise or protection of a right.
7. Provided that it does not harm the fundamental rights and freedoms of the data subject, data processing is mandatory for the legitimate interests of the data controller.
8. Exhibitor Oriented with Stand: Business Partner / Solution Partner / Customer / Potential Customer data is stored for the conduct of commercial relations and communication with internal authorities.
9. Visitor Focused: Visitor data is stored for e-ticket transmission, trade show and event security, and communication purposes.

14.8.3. Disposal Methods

"VOLİ" deletes, destroys or anonymizes the personal data stored in accordance with the Law and other legislation and the Personal Data Protection, Processing, Storage and Destruction Policy, ex officio, upon the request of the relevant person or within the periods specified in this Personal Data Protection, Processing, Storage and Destruction Policy, in case the reasons requiring the processing of the data disappear. Participant Focused with Stand: Data shared with internal authorities is protected by KVKK and internal security procedures during deletion or anonymization processes. Visitor Focused: E-ticket and entry data are not shared unless requested; deletion or anonymization procedures are

applied.

The most commonly used deletion, destruction, and anonymization techniques by "VOLI" are listed below:

14.8.3.1. Deletion Methods

Deletion Methods for Personal Data Kept in Printed Media	
Blackout	Personal data in printed media is deleted using the blackout method. The blackout process is done by cutting the personal data on the relevant document when possible, and making it invisible by using fixed ink in a way that cannot be reversed and read with technological solutions when it is not possible.
Deletion Methods for Personal Data Kept in the Cloud and Local Digital Environment	
Secure deletion from software	Personal data kept in the cloud or local digital environments is deleted with a digital command so that it cannot be recovered. In this way, the deleted data cannot be accessed again.

14.8.3.2. Disposal Methods

Destruction Methods for Personal Data Kept in Printed Media	
Physical destruction	Documents kept in printed media are destroyed in such a way that they cannot be reassembled with document shredders.
Destruction Methods for Personal Data Kept in Local Digital Environment	
Physical destruction	It is the process of physically destroying optical and magnetic media containing personal data, such as melting, burning or pulverizing. Data is made inaccessible by processes such as melting, burning, pulverizing, physically cutting and/or drilling optical or magnetic media, or passing it through a metal grinder.
De-magnetization (degauss)	It is the process of improvingly distort the data on magnetic media by exposing it to a high magnetic field.
Overwriting	Random data consisting of 0s and 1s is written on magnetic media and rewritable optical media at least seven times, preventing the old data from being read and recovered.
Destruction Methods for Personal Data Kept in the Cloud	
Secure deletion from software	Personal data kept in the cloud environment is deleted with a digital command so that it cannot be recovered, and when the cloud computing service relationship ends, all copies of the encryption keys required to make the personal data usable are destroyed. In this way, the deleted data cannot be accessed again.

14.8.3.3. Anonymization Methods

Anonymization is the rendering of personal data that cannot be associated with an identified or identifiable natural person in any way, even by matching it with other data.

Removing variables	It is the removal of one or more of the direct identifiers in the personal data of the data subject that will be used to identify the data subject in any way. This method can be used to anonymize personal data, as well as to delete personal data if there is information in the personal data that does not comply with the purpose of data processing.
Regional hiding	It is the process of deleting information that may be distinctive regarding the data that is in an exception in the data table where personal data is collectively anonymous.
Generalization	It is the process of bringing together the personal data of many people, removing their distinctive information and turning them into statistical data.
Lower and upper bound encoding / Global encoding	For a certain variable, the intervals of that variable are defined and categorized. If the variable does not contain a numerical value, then the data in the variable that are close to each other are categorized. Values that remain within the same category are merged.
Micro-incorporation	With this method, all records in the dataset are first arranged in a meaningful order, and then the whole set is divided into a certain number of subsets. Then, the value of that variable of that variable of the subset is replaced with the average value by averaging the value of each subset for the specified variable. In this way, since the indirect identifiers in the data will be corrupted, it is difficult to associate the data with the relevant person.
Data hashing and corruption	Direct or indirect identifiers in personal data are mixed with other values or corrupted, breaking their relationship with the relevant person and making them lose their descriptive qualities.

"VOLI" uses one or more of these anonymization methods for the anonymization of personal data, depending on the nature of the relevant data. "VOLI" may use K-Anonymity, L-Diversity and T-Proximity statistical methods while using these anonymization methods.

14.9. Personal Data Storage and Destruction Periods

The Showing the Retention and Destruction Periods of Personal Data is given below. In periodic destruction or destruction to be carried out upon request, the said storage and destruction periods will be taken into account. The Table Showing the Retention and Destruction Periods of Personal Data will be updated by the business units that own the processes to be included in the personal data inventory, in case of hesitation, by taking the evaluations of the Personal Data Protection Committee.

14.9.1. Personal Data Retention Table (Periods)

DATA OWNER	DATA CATEGORY	DATA RETENTION PERIOD
Employees	Recruitment documents and Social Security Institution; Personal data based on notifications regarding service period and wages, personal data other than basic personal data and data in the workplace personal health file,	In the continuation of the service contract and It is kept for 10 (ten) years from the date of its term. Termination of the employment contract within the scope of occupational health and safety legislation It is kept for 15 (fifteen) years.

Business Partner/Solution Partner/Consultant	Identity information, contact information, financial information regarding the conduct of the commercial relationship between the Business Partner/Solution Partner/Consultant and "VOLİ" , voice recordings taken in phone calls, Business Partner/Business Partner/Consultant employee data. Exhibitor Focused with Stand: Shared with internal authorities	It is kept for a period of 10 (ten) years in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code during and after the termination of the business/commercial relationship of the Business Partner/Solution Partner/Consultant with "VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ".
Visitors	Name, surname, vehicle license plate and camera recordings of the Visitor taken at the entrance to the physical space belonging to "VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ". Visitor Oriented: The e-ticket will be sent to the shared e-mail address	It is kept for 1 (one) year. Wifi network connection information is stored for 2 (two) years.
Website Visitor	Name, surname, e-mail address, browsing activity information of the Website Visitor	It is kept for 2 (two) years.
Employee Candidate	Resume of the Employee Candidate and job application	For a maximum of 2 (two) years
	information in the form	It is stored for the period when the resume will be out of date.
Customer	Customer's identity information, contact information, payment information and methods, browsing activity information, phone calls Voice recordings taken, product/service preferences, transaction history information	It is stored for 10 (ten) years in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code from the presentation of each product/service purchased by the Customer.
Customer, Employee, Employee Candidate, Visitors, Suppliers, Business Partners	Camera images, Switchboard call information	It is stored for 1 (one) month. Switchboard call information is stored for 2 (two) years.
Potential Customer	Identity information, contact information, financial information obtained during the contract negotiations regarding the establishment of a commercial relationship between the Potential Customer and "VOLİ"	It is stored for 10 (ten) years.
"VOLİ FAIR SERVICES JOINT STOCK COMPANY" "s Cooperation Institution/ VOLİ " (Supplier, Contract Manufacturer, Dealer/Franchise	"VOLİ" is in Cooperation Identity information, contact information, financial information regarding the execution of the commercial relationship between the Institution/Companies and "VOLİ", Cooperation of "VOLİ" Institution/Company employee data	VOLİ FAIR SERVICES JOINT STOCK COMPANY "During and after the termination of the business/commercial relationship with "VOLİ", Article 146 of the Turkish Code of Obligations and Turkish Commercial Trade. It is kept for 10 (ten) years in

		accordance with Article 82 of the Law.
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* If a longer period is regulated in accordance with the legislation or if a longer period is stipulated for the statute of limitations, limitation period, retention periods, etc. in accordance with the legislation, the periods in the provisions of the legislation are considered as the maximum retention period.

14.9.2. Disposal Times

"VOLİ" deletes, destroys or anonymizes the personal data in the first periodic destruction process following the date on which the obligation to delete, destroy (destroy) or anonymize the personal data for which it is responsible in accordance with the Law, relevant legislation, Personal Data Protection, Processing, Storage and Destruction Policy arises. Exhibitor Oriented with Stand: In-house officials are notified upon request or during periodic disposal. Visitor Focused: E-ticket and visitor data are not shared outside of e-mail unless requested.

When the data subject applies to "VOLİ" pursuant to 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; "VOLİ" deletes, destroys or anonymizes the personal data subject to the request within 30 (thirty) days from the day it receives the request, by explaining the reason, with the appropriate destruction method. **In order for "VOLİ" to be deemed to have received the request, the relevant person must have made the request in accordance with the Personal Data Protection and Processing Policy.** VOLİ FUAR HİZMETLERİ ANONİM ŞİRKETİ ", in any case, informs the relevant person about the transaction made.
2. If all the conditions for processing personal data have not disappeared, this request **may be rejected by "VOLİ" by explaining the reason in accordance with the third paragraph of Article 13 of the Law and the rejection response is notified to the relevant person in writing or electronically within thirty days at the latest.**

14.10. Periodic Disposal Times

In the event that all of the conditions for processing personal data in the KVKK Law No. 6698 disappear; "VOLİ" deletes, destroys or anonymizes the personal data whose processing conditions have disappeared with a process specified in this Personal Data Protection, Processing, Storage and Destruction Policy and to be carried out ex officio at repeated intervals.

15. INSPECTION OF THE LEGALITY OF THE DESTRUCTION PROCESS

"VOLİ" carries out the destruction operations carried out ex officio both upon request and in periodic destruction processes in accordance with the Law, other legislation, Personal Data Protection, Processing, Storage and Destruction Policy. Exhibitor Oriented with Stand: The disposal process is supervised by company officials and third service providers. Visitor-Centric: The security of e-ticket and entry data is ensured, with anonymization or deletion only applied when necessary.

"VOLİ" takes a number of administrative and technical measures in order to ensure that the destruction operations are carried out in accordance with these regulations.

15.1. Technical Measures

- "VOLİ" provides technical means and equipment suitable for each destruction method included in this policy.
- "VOLİ" ensures the security of the place where the destruction operations are carried out.
- "VOLİ" keeps the access records of the persons who perform the destruction process.
- "VOLİ" employs competent and experienced personnel to carry out the destruction process or receives services from competent third parties when necessary.

15.2. Administrative Measures

- "VOLI" works to increase the awareness of its employees who will carry out the destruction process on information security, personal data and privacy of private life.
- "VOLI" 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.
- **In cases where the destruction process is carried out by third parties due to technical or legal requirements, "VOLI" signs protocols with the relevant third parties for the protection of personal data and shows all necessary care to ensure that the relevant third parties comply with their obligations under these protocols.**
- "VOLI" regularly inspects whether the destruction operations are carried out in accordance with the law and the terms and obligations specified in this Personal Data Protection, Processing, Storage and Destruction Policy and takes the necessary actions.

All transactions related to the deletion, destruction and anonymization of personal data are recorded and these records are kept for at least two years, excluding other legal obligations.

16. ENFORCEMENT

The policy will enter into force as of the date of publication.

It is the responsibility of the **Personal Data Protection Committee to announce the policy throughout "VOLI"** and to make the necessary updates.

17. UPDATE AND COMPLIANCE

"VOLI" reserves the right to make changes in the Personal Data Protection, Processing, Storage and Destruction Policy due to the amendments made in the Law, in accordance with the decisions of the Authority or in line with the developments in the sector or in the field of informatics.

Changes made to this Personal Data Protection, Processing, Storage and Destruction Policy are recorded in the text without delay and explanations regarding the changes are explained at the end of the policy.