

	PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
		Version No	1
		Date of Publication	01/03/2023
		Date of Revision	01/03/2023
		Page Number	12

**LA CONFEDERAZIONE DEGLI IMPRENDITORI
ITALIANI NEL MONDO**

**PERSONAL DATA RETENTION AND
DESTRUCTION
POLICY**

	PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
		Version No	1
		Date of Publication	01/03/2023
		Date of Revision	01/03/2023
		Page Number	12

LA CONFEDERAZIONE DEGLI IMPRENDITORI ITALIANI NEL MONDO

PERSONAL DATA STORAGE AND DESTRUCTION POLICY

ADDRESS : Barbaros Mah. Tophanelioğlu Cad. No:54 Altunizade/Üsküdar/Istanbul

PHONE NUMBER: : +90 216 544 49 59

WEBSITE: : <https://www.ciimeurasiamed.org/>

It is forbidden to copy, reproduce, use, publish and distribute all content in this Policy text without partial or complete permission except for individual use. Legal action will be taken for those who do not comply with this prohibition in accordance with the Law Numbered 5846, on Intellectual and Artistic Works.

All rights of the product are reserved.

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

1. INTRODUCTION

1.1. Objectives

Personal Data Storage and Destruction Policy (“Policy”), has been prepared by LA CONFEDERAZIONE DEGLI IMPRENDITORI ITALIANI NEL MONDO (“C.I.I.M”) to determine the procedures and principles regarding the works and transactions related to the storage and destruction activities.

C.I.I.M., in line with the mission, vision and basic principles determined in the Strategic Plan; C.I.I.M. has prioritized the data processing process of the personal data of its employees, candidates, service providers, subcontractors, trainees, product / service buyers, potential product / service buyers, visitors and other third parties in accordance with Constitution of Turkey, International Treaties, Personal Data Protection Law numbered 6698 (the "Law") and in accordance with other relevant legislation.

The work and procedures regarding the storage and destruction of personal data are carried out in accordance with the Policy prepared by C.I.I.M. in this direction.

1.2. Scope

Personal data of C.I.I.M. employees, employee candidates, service providers, subcontractors, trainees, product / service buyers, potential product/service buyers, visitors and other third parties are covered by this Policy. This Policy will be applied to all recording media and activities for personal data processing and personal data managed by C.I.I.M. or processed by the C.I.I.M..

1.3. Definitions

Group of Recipient	The category of natural or legal persons to whom personal data is transferred by the data controller.
Explicit consent:	Freely given, specific and informed consent,
Anonymizing	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data
Employee	C.I.I.M.’s employee.
Electronic Environment	Environments where personal data can be created, read, changed and written with electronic devices.
Non-Electronic Environment	All written, printed, visual, etc., other than electronic media. other environments.
Service Provider	Natural or legal person providing services within the framework of a specific contract with C.I.I.M..
Data Subject	The natural person, whose personal data is processed

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

Related User (?)	Persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, with the exception of the person or unit responsible for the technical storage, protection and backup of the data.
Destruction	Erasure, destruction or anonymizing of personal data
The Law	Law on the Protection of Personal Data No. 6698.
Recording Medium	Any environment in which personal data are processed, which are fully or partially automated or processed in non-automated ways, provided that they are part of any data recording system.
Personal Data	All the information relating to an identified or identifiable natural Person
Personal Data Processing Inventory	The inventory in which data controllers detail, personal data processing activities that data controller carry out depending on their business processes; purpose and legal reason of processing personal data, the data category, the incoming recipient group, and the inventory that they have created by associating them with the data subject group and detailing the personal data required for the purposes for which they are processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security
Processing of personal data	Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means,
Personal Data of Special Nature	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data are deemed to be personal data of special nature
Periodic Destruction	The process of deleting, destroying or anonymizing the personal data in the law, which will be carried out manually at repeated intervals specified in the policy of storing and destroying personal data, if all the processing conditions of the personal data disappear.
Policy	Personal data storage and destruction policy
Processor	The natural or legal person who processes personal data on behalf of the Data controller upon his authorization
Data registry system	The registry system which the personal data is registered into through being structured according to certain criteria,
Data controller	The natural or legal person who determines the purpose and means of

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

	processing personal data and is responsible for establishing and managing the data registry system
Data Controllers Registry Information System (VERBIS)	Information system, which can be accessed over the internet, created and managed by the Authority, for data controllers to register with the Registry and other related transactions.
The Regulation	Regulation about the Erasure, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28 October 2017.

2. RESPONSIBILITIES AND DISTRIBUTION OF DUTIES

All the units and employees of C.I.I.M. will provide support to responsible units in the fields of technical and administrative measures taken by the responsible units within the scope of the Policy, increasing awareness and the training level of unit employees through monitoring and continuous supervision, and preventing unlawful processing of personal data, taking technical and administrative measures to ensure data security in all environments where personal data is processed in order to ensure that personal data are stored in accordance with law.

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

TITLE	UNIT	DUTY
Board of Directors	Board of Directors	They are responsible for the compliance of employees and all units with the policy.
Contact Person	-	He/She is responsible for the follow-up of VERBIS registry and the communication to be established between the Personal Data Protection Authority, and C.I.I.M..
IT Manager	IT	He/She is responsible for providing the technical solutions needed in the implementation of the Policy.
	Other Units	He/She is responsible for the implementation of the Policy in accordance with his/her duties.

3. RECORDING MEDIUMS

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

Personal data is securely/lawfully stored by C.I.I.M. in the environments listed in the table below.

Electronic Environments	Non-Electronic Environments
<ul style="list-style-type: none"> • Servers (Domain, backup, e-mail, database, web, file sharing, etc.) • Software (office software, mobile applications etc.) • Information security devices (firewall, intrusion detection and blocking, log file, antivirus etc.) • Personal computers (Desktop, laptop) • Mobile devices (phone, tablet etc.) • Optical discs (CD, DVD etc.) • Removable memory (USB, Memory Card etc.) • Printer, scanner, copier 	<ul style="list-style-type: none"> • Paper, • Manual data recording systems (questionnaire forms, visitor entry book etc.) • Written, printed, visual media

4. NOTIFICATION ABOUT THE DATA STORAGE AND DESTRUCTION

On the part of C.I.I.M., personal data of employees, candidates for employees, visitors and third parties, institutions or organizations with whom they are associated as service providers are stored and destroyed in accordance with the Law. In this context, detailed explanations about storage and destruction are given below.

4.1. Disclosures About Storage

The notion of “*processing of personal data*” is defined in Article 3 of the Law, and it is stated in Article 4, that the personal data processed should be “*connected, limited and measured for the purpose for which they are processed and kept for the time required for the purpose for which they are processed or foreseen in the relevant legislation*” and in the 5th and 6th articles of the Law, “*processing conditions of personal data*” are counted.

Accordingly, within the framework of C.I.I.M. activities, personal data is “*stored for the period specified in the relevant legislation or in accordance with our processing purposes.*”

4.1.1. Processing Purposes Requiring Storage

C.I.I.M. stores the personal data, that it processes within the framework of its activities for the following purposes;

- To carry out human resources processes.
- To provide corporate communication.

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

- To inform customers and potential customers about the products / services offered.
 - To provide security for buildings and construction sites.
 - To carry out Occupational Health and Safety processes.
 - To make statistical studies.
 - To be able to perform business and transactions as a result of signed contracts and protocols.
 - To ensure that legal obligations are fulfilled as required or required by legal regulations.
 - To provide contact with natural / legal persons who have business relations with C.I.I.M..
- To fulfill the obligation to prove with evidence to be used in future legal disputes.

4.1.2. Legal Reasons for the Storage

Personal data processed within the framework of C.I.I.M.'s activities are stored for the period stipulated in the relevant legislation. In this context, personal data is kept as long as the retention periods envisaged within stated Acts,

- Law No. 6698 on Protection of Personal Data,
- Turkish Code of Obligations No. 6098,
- Social Insurance and General Health Insurance Law No. 5510,
- Law No. 5651 on Regulation of Publications on The Internet and Suppression of Crimes Committed by Means of Such Publications,
- Occupational Health and Safety Law No. 6331,
- Labor Law No. 4857,
- Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Add-ons,
- Other secondary regulations in force in accordance with these laws,

4.2. Disclosures on Destruction and Reasons Requiring Destruction

Personal data will be erased, destroyed, or erased-ex officio, or anonymized by C.I.I.M. due to the request of the person concerned, in the cases listed below

- Amendment or relevance of relevant legislation provisions that constitute the basis for the processing,
- If the purpose that requires processing or storage is eliminated,
- If the relevant person revoke the explicit consent, in cases where the processing of personal data takes place only in accordance with the explicit consent condition,

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

- If C.I.I.M. accepts the application for erasure and destruction of personal data within the framework of the rights of the person pursuant to Article 11 of the Law,
- If the data subject complaints to the Board and his/her request is approved by the Board, in the cases where the C.I.I.M. rejects the application made by the relevant person for the request of deletion, destruction or anonymization of his personal data, or In cases where the C.I.I.M. finds the answer he/she gives inadequate or does not respond within the period stipulated by the Law;
- If the maximum period of time requiring the storage of personal data has passed and there are no conditions to justify keeping the personal data for longer,

5. TECHNICAL AND ADMINISTRATIVE MEASURES

In order to protect personal data in a safe manner, to prevent illegal processing and access, and to dispose of personal data in accordance with the law, in accordance with the Article 12 and Article 6 Paragraph 4 of the Law, technical and administrative measures are taken by C.I.I.M. within the framework of adequate measures determined and announced by the Personal Data Protection Authority for personal data of special nature.

5.1. Technical Measures Taken

The technical measures taken by C.I.I.M. regarding the personal data it processes are listed below:

- Establishing an access management process to prevent unauthorized access to personal data,
- Creation of classification and incident management processes related to data protection,
- Establishing a vulnerability screening process for detecting security vulnerabilities in recording media where personal data are kept and taking actions,
- Using the necessary solutions to prevent the malicious software from accessing the C.I.I.M. network,
- Identification of risks to prevent illegal processing of personal data,
- Ensuring that appropriate technical measures are taken for these risks and performing technical controls for the measures taken,
- Taking necessary measures to ensure that the erased personal data is not accessible and reusable for the users concerned.

5.2. Administrative Measures Taken

The administrative measures taken by C.I.I.M. regarding the personal data it processes are listed below

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

- Before starting to process personal data, fulfilling the obligation to enlighten the relevant persons and obtaining their explicit consent, if necessary,
- Undertaking the necessary and sufficient information security, privacy and protection of personal data in the commercial and non-commercial business and relations of the C.I.I.M., through third party contacts with whom it has established a contractual relationship,
- Publication of Personal Data Storage and Destruction Policy,
- Publishing the cookie policy, and the general informative enlightenment text within the C.I.I.M. website,
- Analyzing the activities and processes within C.I.I.M. and determining the actions to be taken in order to comply with the law within the scope of compliance studies with the Law,
- Creation of Personal Data Inventory,
- To improve employee personal data security awareness; Providing trainings on preventing the processing of personal data illegally, preventing the access of personal data illegally, and ensuring the protection of personal data.

6. PERSONAL DATA DESTRUCTION POLICY

At the end of the period stipulated in the relevant legislation or the retention period required for the purpose for which they are processed, personal data will be destroyed by C.I.I.M., upon the application of the relevant person, in accordance with the provisions of the relevant legislation.

6.1. Erasure of the Personal Data

Personal data will be deleted by the methods listed below:

Data Processing Environment	Description of the Transaction
Personal Data on Servers	The erasure will be made through the system administrator removal of the access privileges of the relevant users, if the storage period of the personal data processed on servers has expired.
Personal Data in Electronic Environment	If the storage period of the personal data processed in electronic environment has expired, except the database administrator, for all users(except relevants), the database will be in no way accessible and reusable.
Personal Data in Physical Environment	If the storage period of the personal data processed in physical environment has expired, the personal data will be in no way accessible and reusable. In addition, blackening is applied by drawing / painting / erasing in an unreadable manner.
Personal Data on Portable Media	If the period that requires the storage of personal data stored in Flash-based storage environments has expired, it will be stored in secure environments by the system administrator with encryption keys via encrypting it and only to the system administrator will be authorised for granting access.

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

6.2. Destruction of Personal Data

Personal data are destroyed by C.I.I.M. in the following ways:

Data Processing Environment	Description of the Transaction
Personal Data in Physical Environment	The ones contained in the paper environment and has been expired to be stored as the personal data will be irreversibly destroyed in paper clipping machines.
Personal Data in Optical / Magnetic Media CD, USB etc.	If the period that requires the storage of personal data in Optical media and magnetic media has expired, physical destruction of these processes such as melting, burning or dusting is applied. In addition, the magnetic media is passed through a special device and exposed to a high value magnetic field, in order to make the data on it unreadable.

6.3. Anonymizing Personal Data

Anonymizing personal data is to make personal data unrelated to an identified or identifiable natural person by any means, even if it is matched with other data.

In order to anonymize personal data; the personal data must be rendered unrelated to a specific or identifiable natural person, even by using appropriate techniques for the recording environment and related field of activity, such as the return of data by the data controller or third parties and / or the matching of data with other data. In this context, C.I.I.M. makes use of anonymization methods in the guides published by the Personal Data Protection Authority for personal data in which processing purpose has disappeared.

7. STORAGE AND DESTRUCTION TIME

7.1. Periodic Destruction Time

In accordance with 11th article of the Regulation on the Erasure, Destruction or Anonymization of Personal Data, C.I.I.M. determined the periodic time of destruction as 6 months. Accordingly, in parallel with the Personal Data Inventory, C.I.I.M. will periodically check the personal data stored in its digital and physical environments every 6 months (180 days) at the latest and will delete or destroy anonymous data at repeated intervals when the purpose for which they are processed ends.

7.2. Process Based Storage and Destruction Times Table

These are included by C.I.I.M. regarding the personal data being processed within the scope of its activities;

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

- Storage periods based on personal data related to all personal data within the scope of activities carried out depending on the processes are in the Personal Data Processing Inventory;
- Storage periods based on data categories are registered with VERBIS;
- Process-based storage periods in Personal Data Storage and Destruction Policy

If necessary, updates will be made about these storage periods. For personal data whose storage periods have expired, the deletion, destruction or anonymization process is carried out by the authorized units of the C.I.I.M..

PROCESS	STORAGE PERIOD	DESTRUCTION TIME
C.I.I.M.'s members and potential customer transactions	From the date the purpose of processing ends	At the first periodic destruction after the storage period is over
Contract signing phase	10 years	At the first periodic destruction after the storage period is over
Fulfillment of obligations arising from OHS legislation	15 years	At the first periodic destruction after the storage period is over
Conducting procurement, purchasing and accounting processes	10 years	At the first periodic destruction after the storage period is over
Execution of human resources processes	10 years	At the first periodic destruction after the storage period is over
Health reports	15 years	At the first periodic destruction after the storage period is over
Conducting job application evaluation processes	6 months	At the first periodic destruction after the storage period is over
Visual and audio recordings	1 month	At the first periodic destruction after the storage period is over
Execution of Invoicing and Archive processes	10 years	At the first periodic destruction after the storage period is over
Supervision and follow-up of supply processes	10 years	At the first periodic destruction after the storage period is over

PERSONAL DATA RETENTION AND DESTRUCTION POLICY	Reference No	1
	Version No	1
	Date of Publication	01/03/2023
	Date of Revision	01/03/2023
	Page Number	12

--	--	--

8. PUBLICATION AND UPDATE OF POLICY

The policy is published in two different media: wet signed (printed paper) and electronic media, and publicly disclosed on the website of C.I.I.M.. Printed copies are kept in the C.I.I.M. data base and made available to everyone.

The policy will be revised if needed and the necessary sections will be updated. The current version of the policy will be valid from the moment it is uploaded to C.I.I.M. website and the C.I.I.M. data registry. It is kept open to everyone's access.

9. THE VALIDITY OF THE POLICY

The policy is considered to have come into force after it has been published on the C.I.I.M.'s website. In the event that it is decided to be repealed, the old copies of the Policy, signed by the Board of Directors, will be canceled (signed by cancellation stamp or by cancellation) and will be kept in the C.I.I.M. database for at least 5 years.