

**TUSAŞ ENGINE INDUSTRIES, INC.**  
**POLICY ON STORAGE AND DESTRUCTION of PERSONAL DATA**



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## 1. INTRODUCTION

### 1.1. Purpose

This Personal Data Retention and Destruction Policy (hereinafter referred to as "**Policy**") has been prepared by the TUSAŞ Engine Industries, Inc. (hereinafter referred to as "**TEI**" or "**Company**") in the capacity of data controller to fulfill our obligations, to make explanations about personal data processing activity and systems adopted for the protection of personal data within the framework of the legislation on personal data, and to inform the relevant persons of the principles of determining the maximum storage period required for the purpose of processing your personal data and of the deletion, destruction and anonymization processes in accordance with Law No. 6698 on Protection of Personal Data ("**PDP**" or "**Law**") and Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated October 28, 2017, which constitutes the secondary regulation of the Law (hereinafter referred to as "**Regulation**").

### 1.2. Scope

This Policy covers the storage and destruction of personal data related to employee candidates, product/service purchaser officers/employees, supplier officers/employees, visitors and other third parties, and this Policy is applied in all recording media owned or managed by the Company and the storage and destruction activities of personal data.

The scope of application of this Policy regarding the relevant persons in the categories mentioned above may be the entire Policy (eg. our active customers, who are also our visitors); it may only some provisions (eg. our Visitors).

As this Policy may be updated from time to time, we request you to visit the Company's website regularly to access the most up-to-date version of the Policy. In addition, in cases where there are no provisions on other issues such as processing, storing and transferring personal data in this Policy, detailed information on these issues can be accessed from TEI's Personal Data Protection and Processing Policy that can be found on [www.tei.com.tr](http://www.tei.com.tr).

If there is a conflict between the Law on PDP and other relevant legislation and the Policy, the legislation in force will apply.

### 1.3. Definitions

The definitions used in this Policy are as follows:

<b>Explicit Consent:</b>	It means a consent about a specific subject based on information and expressed in free will.
<b>Relevant Person:</b>	It means the real person whose personal data is processed.
<b>Relevant User:</b>	The persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except the person or unit responsible for the storage, protection and backup of the data technically.
<b>Destruction:</b>	Deletion, destruction or anonymization of personal data.

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<b>Law or PDP:</b>	Law on Protection of Personal Data No. 6698
<b>Recording Medium:</b>	Any environment in which personal data are processed, which are fully or partially in automated ways or non-automated ways provided that being part of any data recording system.
<b>Personal Data:</b>	Any information related to real person who is identified or identifiable.
<b>Personal Data Processing Inventory:</b>	It means the inventory created and elaborated by data controllers by associating personal data processing activities carried out by data controllers depending on the business processes and personal data processing purposes and the legal reason with the data category, the transferred recipient group and the data subject group, and where they explain the maximum retention period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security.
<b>Personal Data Protection and Processing Policy:</b>	TEI Personal Data Protection and Processing Policy that can be accessed at <a href="http://www.tei.com.tr">www.tei.com.tr</a> .
<b>Relevant Person Application Form:</b>	The application form that the relevant person whose personal data is processed within the company can make use of their applications regarding the rights stated in Article 11 of the Law.
<b>The Processing of Personal Data:</b>	It means all kinds of processes performed on personal data including obtaining, recording, storing, keeping, changing, re-arranging, disclosure, transmission, acquisition, making available, classification or prevention of use in whole or in part, automatically or in non-automatic ways, being part of any data recording system.
<b>Anonymization of Personal Data:</b>	Making personal data not to be associated with any identified or identifiable real person in any way, even when paired with other data.
<b>Deletion of Personal Data:</b>	The process of making personal data inaccessible and unavailable in any way for relevant users.
<b>Destruction of Personal Data:</b>	The process of rendering personal data inaccessible, unrecoverable and unusable by anyone in no way.
<b>Board:</b>	Personal Data Protection Board.
<b>Authority:</b>	Personal Data Protection Authority.
<b>Sensitive Personal Data:</b>	It means personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership of associations, foundations or trade-unions, information relating to health, sexual life, convictions and security measures, and the biometric and genetic data.
<b>Periodic Destruction:</b>	In the event that all the processing conditions of personal data in the Law disappear, the process of erasure, destruction, or anonymization of the personal data that will be carried out at regular intervals specified in the storage and destruction policy.
<b>Policy:</b>	Personal Data Retention and Destruction Policy.
<b>Data Processor:</b>	A natural or legal person who processes personal data on his behalf on the basis of the authority conferred by the data officer.

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<b>Data Controller:</b>	Real or legal person responsible for identifying the purposes and means of personal data processing, and installing and managing data recording system.
<b>Data Controllers Registry (VERBİS):</b>	Register of data controllers kept by the Presidency under the supervision of the Personal Data Protection Board.
<b>Regulation:</b>	Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated October 28, 2017.

## 2. PRINCIPLES

The processing, storage and Destruction of personal data by the company are carried out within the framework of the following principles:

- In accordance with Article 4 of Law on PDP, personal data existing or acquired by our company are processed; *(I)* in accordance with the law and in good faith, *(ii)* in an accurate and up-to-date manner when necessary, *(iii)* for specific, explicit and legitimate purposes, *(iv)* and are used in a limited and measured manner in connection with the purpose for which they are processed and *(v)* are kept by the Company for the period stipulated in the relevant legislation or required for the purpose for which they are processed as determined in this Policy.<sup>1</sup>
- Our Company processes personal data and sensitive personal data with the express consent of the relevant persons or without the express consent of the relevant persons in cases stipulated in Articles 5 and 6 of the PDP. Relevant persons are informed by our Company regarding personal data processing processes in accordance with Article 10 of the PDP, and necessary information is provided if the relevant person requests information.
- In the deletion, destruction and anonymization of personal data, actions are taken in full compliance with the technical and administrative measures that must be taken within the scope of Article 12 of the Law and specified in Article 5 of this Policy, the provisions of the relevant legislation, Board decisions and this Policy.
- All processes regarding the deletion, destruction and anonymization of personal data are recorded by the Company and the said records are kept for at least 3 years, excluding other legal obligations.
- Unless otherwise decided by the Board, the appropriate method of deleting, destroying or anonymizing personal data is selected by us. However; the appropriate method will be selected by explaining the reason upon the request of the relevant person.
- In the event that all the conditions for processing personal data stipulated in Articles 5 and 6 of the Law are eliminated, personal data are deleted, destroyed or anonymized by the Company ex officio or upon the request of the relevant person. If the relevant person applies to the Company in this regard;
  - Submitted requests are concluded within 30 (thirty) days at the latest and the relevant person is informed,

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<sup>1</sup>Detailed information on the principles can be accessed from TEI's Personal Data Protection and Processing Policy, which can be found at [www.tei.com.tr](http://www.tei.com.tr).

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- If the data which is subject to the request has been transferred to third parties, this will be reported to the third party to whom the data has been transferred and it will be ensured that the necessary actions are taken in the eye of third parties.

### **3. RECORDING MEDIUM**

Personal data of the relevant persons are securely stored by the Company in the media listed in the table below, in accordance with the relevant legislation, especially the provisions of the PDP, and within the framework of international data security principles, in the media listed in the table below. (Table 1) :

(Table 1: Table for Recording Media of Personal Data)

<b>ELECTRONIC MEDIA</b>	<b>NON-ELECTRONIC MEDIA</b>
<p>These are the media in which data are kept in other technological devices such as computers and phones:</p> <ul style="list-style-type: none"><li>– Servers (Domain, backup, e-mail, database, web, file sharing etc.);</li><li>– Software;</li><li>– Information security devices;</li><li>– Personal computers (Desktop, laptop);</li><li>– Mobile Devices (phone, tablet etc.);</li><li>– Optical discs and removable memory (CD, DVD, USB, External disk etc.);</li><li>– Cloud storage (media using internet-based systems encrypted with cryptographic methods).</li></ul>	<p>They are the media in which data are kept by printing on paper or microfilms:</p> <ul style="list-style-type: none"><li>– Paper;</li><li>– Manual data recording systems (survey forms, visitor logbook);</li><li>– Written, printed and visual media.</li></ul>

### **4. REASONS REQUIRING STORAGE AND DISPOSAL**

The personal data of the relevant persons are stored and destroyed by the Company in accordance with the Law. In this context, detailed explanations regarding storage and destruction are given below:

#### **4.1. Explanations Regarding Retention**

Personal data belonging to the relevant person are collected by the Company within the scope of personal data processing conditions specified in Articles 5 and 6 of the Law<sup>2</sup>; (i) to continue commercial activities, (ii) to fulfill legal obligations, (iii) to fulfill the obligations related to defense industry security legislation and (iiii) to manage customer relations in electronic or non-electronic environments listed above stored within the specified limits in the Law and other relevant legislation.

The reasons requiring storage are as follows:

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<sup>2</sup>Detailed information on storage (processing) purposes can be accessed from TEI's Personal Data Protection and Processing Policy, which can be found at [www.tei.com.tr](http://www.tei.com.tr).

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- Clearly anticipation of the storage of personal data in the legislation,
- Retention of personal data as it is directly related to the establishment and performance of contracts,
- Retention of personal data depending on the Company's fulfillment of any legislation or legal obligations it is obliged to comply with,
- Retention of personal data as it is made public by the relevant person,
- Retention of personal data depending on the establishment, use or protection of a right,
- The obligation to store personal data for Company's legitimate interests, provided that it does not harm the fundamental rights and freedoms of individuals,
- Express consent of the relevant persons in terms of storage activities requiring the express consent of the relevant persons.

**4.2. Explanations on Destruction**

Although it is stored in accordance with the provisions of the law and other relevant laws, personal data are deleted, destroyed or anonymized by the data controller at the request of you or the relevant person, in the event that the reasons for their storage disappear. In this context, in accordance with the Law and Regulation, the personal data of the relevant persons in the following cases are deleted, destroyed or anonymized by the Company ex officio or on their own request:

- Amendment or abolition of relevant legislative provisions that constitute the basis for the processing or storage of personal data,
- The disappearance of the purpose that requires the processing or storage of personal data,
- The disappearance of conditions that require the processing of personal data in Articles 5 and 6 of the Law,
- In cases where the processing of personal data takes place only in accordance with the explicit consent condition, the relevant person's withdrawal of his/her consent,
- Acceptance of the application of the relevant person regarding the deletion, destruction or anonymization of his/her personal data within the framework of the rights of Article 11 of the Law in paragraphs 2 (e) and (f),
- In cases where the data controller rejects the application made by the relevant person on the request of erasure, destruction or anonymization of his personal data, or his response is found inadequate, or does not respond within the period stipulated by the Law; existence of complain to the Board and approval of this request by the Board,
- Although the maximum time requiring personal data to be stored has passed, the non-existence of any conditions to justify storing personal data for longer.

**5. ADMINISTRATIVE AND TECHNICAL MEASURES**

In accordance with Article 12 of the Law, our company takes all necessary technical and administrative measures to prevent unlawful processing of personal data and unlawful access

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to personal data, and to ensure the appropriate level of security in order to preserve personal data. In this context, the administrative and technical measures taken by the Company are listed below:

**5.1. Administrative Measures**

Administrative measures taken by our company to prevent unlawful access to personal data are listed below:

- There are disciplinary regulations that include data security provisions for employees.
- Training and awareness studies are carried out at certain intervals on data security for employees.
- The obligation to inform the relevant persons is fulfilled.
- Corporate policies on access, information security, usage, retention and destruction have been prepared and implemented.
- Letters of undertaking on confidentiality are prepared.
- The signed contracts contain the provisions on data security.
- Personal data security policies and procedures have been identified.
- Personal data security issues are reported quickly.
- Necessary security precautions are taken for entering and exiting physical environments containing personal data.
- Physical environments containing personal data are protected against external risks (fire, flood etc.).
- Security of environments containing personal data is ensured.
- Personal data is reduced as much as possible.
- Existing risks and threats have been identified.
- Periodic and/or random audits are carried out within the organization.
- Protocols and procedures for sensitive personal data security have been determined and implemented.
- Awareness of data processing service providers on data security is ensured.

**5.2. Technical Measures**

Administrative measures taken by our Company to prevent unlawful access to personal data are listed below:

- Network security and application security are ensured.
- Closed system network is utilized for personal data transfer via the network.
- Key management is implemented.
- Security measures are taken within the scope of supply, development and maintenance of information technology systems.



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- An authority matrix has been created for employees.
- Access logs are maintained regularly.
- When necessary, data masking measures are applied.
- The authorities of the employees who have been subject to change of duty or left jobs are revoked regarding their previous duties.
- Up-to-date anti-virus systems are used.
- Firewalls are implemented.
- Additional security measures are taken for personal data transmitted via paper and the relevant documents are transferred in the form of a confidential document.
- Personal data security is monitored.
- Personal data is backed up and the security of the backed-up personal data is also ensured.
- User account management and authority control system are implemented and these are also followed-up.
- Log records are maintained in such a way that there is no user intervention.
- Existing risks and threats have been identified.
- Intrusion detection and prevention systems are used.
- Penetration test is applied.
- Cyber security measures have been taken and implementation of such measures is constantly monitored.
- Encryption is done.
- Data loss prevention software is used.

## **6. STORAGE AND DISPOSAL PERIODS**

Our company first determines whether a period of time is stipulated in the relevant legislation for the storage of personal data. If a period is stipulated in the relevant legislation, it abides by this period; In case a period is not stipulated, it keeps the personal data for the period required for the purpose for which they are processed. If the purpose of processing of personal data has expired and the retention periods determined by the relevant legislation and/or our Company have expired, they can only be stored for the duration of the statute of limitations stipulated by the law in order to provide evidence in possible legal disputes, to assert the relevant right related to personal data or to establish a defense. Personal data are not stored by our Company based on the possibility of future use.

Retention and destruction times based on the process determined by the Company are shown in the table below. *(Table 2)* In addition, storage periods based on personal data regarding all the personal data under the activities carried out in connection with processes are included in the Personal Data Processing Inventor, and storage periods based on data categories are included in VERBIS.

*(Table 2: Process Based Retention and Destruction Periods)*

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<b>PROCESS</b>	<b>STORAGE PERIOD<sup>3</sup></b>	<b>DISPOSAL PERIOD</b>
Personal Data Regarding the Officers/Employees of the Product Service Providers and Legal Person Product Service Users	10 years from the end of the contract	In the first periodic destruction process following the expiry of the storage period
Personal Data of Suppliers or Legal Person Supplier Officials/Employees	10 years from the end of the contract	In the first periodic destruction process following the expiry of the storage period
Personal Data Obtained Due to Contract Transactions	10 years from the end of the contract	In the first periodic destruction process following the expiry of the storage period
All Personal Data Regarding Accounting and Financial Transactions	5 years from the year following the year when they are taken	In the first periodic destruction process following the expiry of the storage period
All Personal Data Related to Persons Outsourced by the Workplace Physician and OHS Specialist in Accordance with the Occupational Health and Safety Legislation	15 years from the end of the contract	In the first periodic destruction process following the expiry of the storage period
Security Camera Footage	1 year from the date of recording	In the first periodic destruction process following the expiry of the storage period
Personal Data Taken for Tracking Building Entry and Exit Records	1 year from the date of recording	In the first periodic destruction process following the expiry of the storage period
Personal Data Regarding Business Partners / Solution Partners / Consultants	10 years from the end of the business relationship	In the first periodic destruction process following the expiry of the storage period
Personal Data Received for Business Development from Potential Customers and Suppliers	1 year from the date of receipt	In the first periodic destruction process following the expiry of the storage period
Personal Data on the General Assembly and	Indefinite	In the first periodic

<sup>3</sup>Updates can be made by the Company on the said retention periods, if required.

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Personal Data on Immovables		destruction process following the expiry of the storage period
Personal Data Regarding IP Addresses	6 months from the date of receipt	In the first periodic destruction process following the expiry of the storage period

**7. PERIODIC DISPOSAL AND PERSONAL DATA DISPOSAL APPLICATION**

**7.1. Periodic Destruction**

In accordance with the Law, relevant legislation, Policy on Processing and Protection of Personal Data and this Personal Data Retention and Destruction Policy, the Company shall delete, destroy and anonymize the personal data on the first destruction process following the date on which the obligation to delete, destroy or anonymize the personal data that the Company is responsible for arises.

In accordance with Article 11 of the Regulation, the Company has determined the periodic destruction period as 6 months. Accordingly, periodic destruction is carried out by the Company twice a year, in June and December. The company reserves the right to change the periodic destruction dates provided that the period between two periodic destruction periods does not exceed 6 months.

**7.2. Personal Data Destruction Application**

When the relevant person requests the destruction of his personal data by applying to the Company pursuant to Article 13 of the Law<sup>4</sup>;

- If all the conditions for processing personal data have disappeared; the Company shall delete, destroy or anonymize the personal data subject to the request with an appropriate method of destruction within 30 (thirty) days from the date of receipt of the request. The relevant person must have made the request in accordance with the Policy on Processing and Protection of Personal Data so that the Company is deemed to have received the request. The Company shall inform the relevant person about the transaction carried out in any case.
- If all the conditions for processing personal data have not disappeared, this request may be rejected by the Company, in accordance with the third paragraph of Article 13 of the Law by explaining the grounds for rejection and the response shall be notified to the relevant person in writing or electronically within thirty days at the latest.

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<sup>4</sup> Detailed information about how the application to be made to the Company by the relevant person should be made can be accessed from TEI's Personal Data Protection and Processing Policy, which can be found at [www.tei.com.tr](http://www.tei.com.tr).

## 8. PERSONAL DATA DISPOSAL TECHNIQUES

At the end of the period stipulated in the relevant legislation or the storage period required for the purpose for which they are processed, personal data are destroyed by the Company, either on its own initiative or upon the application of the relevant person, using the following techniques in accordance with the provisions of the relevant legislation. In this context, all transactions related to the deletion, destruction and anonymization of personal data are recorded and the said records are kept for at least three years, excluding other legal obligations.

The most common deletion, destruction and anonymization techniques used by the company are listed below:

### 8.1. Deletion of Personal Data

Personal data are deleted using the methods listed in the table below (*Table 3*):

(*Table 3: Methods of Deleting Personal Data*)

METHOD	DESCRIPTION
<b>Securely Deleting Personal Data From Software</b>	<p>While data that are processed in fully or partially automatic ways and stored in digital media are deleted; methods for deleting data from the relevant software in a way to make it inaccessible and unusable for the relevant users in any way are used.</p> <p>Deleting the relevant data in the cloud system by giving a delete command; removing the relevant user's access rights on the file or the directory where the file is located on the central server; the deletion of the relevant rows in the databases with database commands or the deletion of the data on the removable media, ie the flash media, by using appropriate software can be considered within this scope.</p> <p>However, if the deletion of personal data will result in the inability to access and use other data within the system, personal data will also be deemed deleted if personal data are archived by making them unrelated to the relevant person, provided that the following conditions are met.</p> <ul style="list-style-type: none"><li>○ It is not accessible to any other institution, organization or person,</li><li>○ All necessary technical and administrative measures are taken to ensure that personal data can only be accessed by authorized persons.</li></ul>
<b>Blackening of Personal Data on Paper Media</b>	<p>It is a method of physically cutting the relevant personal data out of the document or making them invisible using fixed ink in a way that is irreversible and unreadable using technological solutions so to prevent unintended use of personal data or to delete the data requested to be deleted.</p>

### 8.2. Destruction of Personal Data

Personal data are destroyed using the following methods listed in the table below (*Table 4*):

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(Table 4: Methods of Destruction of Personal Data)

METHOD	DESCRIPTION
<b>Physical Destruction</b>	Documents kept in a non-electronic medium are destroyed by document destruction machines in such a way that they cannot be put back together.  It is the process of physically destroying optical and magnetic media that contain personal data in electronic environment, such as melting, burning or pulverizing. Data is made inaccessible by processes such as melting, burning, pulverizing or passing optical or magnetic media through a metal grinder.
<b>Demagnetization (degauss)</b>	It is the process of degradation of the data on magnetic media in an unreadable manner by exposing it to a high magnetic field.
<b>Override</b>	Reading and recovering old data is prevented by writing random data consisting of 0's and 1's at least seven times on magnetic media and rewritable optical media.

### 8.3. Anonymization of Personal Data

Personal data are anonymized by the methods listed in the table below (Table 5)<sup>5</sup>:

(Table 5: Methods of Anonymizing Personal Data)

METHOD	DESCRIPTION
<b>Anonymization Methods that Do Not Cause Value Irregularities</b>	<p>Anonymization methods that do not cause value irregularity, without any change or addition/removal to the personal data being stored, are methods of anonymization applied by generalizing any personal data group, replacing each other or removing a certain data or sub data group from the group.</p> <p><b>Removing a Variable:</b> After combining the collected data by extracting descriptive data, the existing data set is anonymized by removing "highly descriptive" variables from the created data set. For example, anonymization is provided by removing the data groups of highly descriptive people's name, surname, place of residence information.</p> <p><b>Removing Records:</b> In the method of removing from the records, the data line that contains singularity among the data is excluded from the records, and the stored data are made anonymous. For example, if there is only one senior manager in a company, the remaining data can be anonymized by removing the data of this person from the records where the seniority, salary and gender data of employees at the same level are kept.</p> <p><b>Regional Hide:</b> In the regional hide method, if a single data obtains a determining feature due to the fact that it creates a very visible combination, hiding the relevant data provides anonymization. For example, if only one person among the relevant data controllers on the reserve list of the company's football team is 65 years old, writing 'Unknown' instead of 'Age: 65' in a data set where the information on</p>

<sup>5</sup>Pursuant to Article 28 of the Law, if personal data are processed for purposes such as research, planning and statistics by anonymizing them through official statistics, this will remain outside the scope of the Law and explicit consent will not be required.

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	<p>whether or not he will be able to play football in terms of age, gender and health status is hidden or leaving this section blank will provide anonymization.</p> <p><b>Lower and Upper Limit Coding:</b> The values in a data group that includes categories predefined by the lower and upper limit coding method are combined by setting a certain criterion, which provides anonymization. For example, instead of directly specifying the years of seniority of the personnel working in a workplace, a definition can be used according to the working year in the workplace. According to working less than 5 years, from 5 to 10 years or more than 10 years; it can be anonymized by stating very experienced, experienced or inexperienced, without specifying the specific year of seniority.</p> <p><b>Generalization:</b> With the data aggregation method, several data are aggregated and personal data cannot be associated with any person. For example; presenting that there are Z number of employees at the age of X without showing the age of employees individually.</p> <p><b>Global Coding:</b> Through data derivation, a more general content is created than the content of the personal data and it is ensured that personal data is made in a manner that is not associated with any person. For example; indicating ages instead of birth dates; indicating the region of residence instead of the full address.</p>
<b>Anonymization Methods That Cause Value Irregularities</b>	<p>Unlike those that do not provide value irregularities, changing some data creates distortion in personal data groups in anonymization methods that provide value irregularity. When using these methods, deviations in line with the expected/desired benefit will need to be applied carefully. By ensuring that the total statistics are not distorted, it is still possible to continue to benefit from the data as expected.</p> <p><b>Adding Noise:</b> The method of adding noise to the data, especially in a dataset where numerical data are predominant, is used to anonymize the data by adding a number of plus or minus deviations to the existing data. For example, using a (+/-) 3 kg deviation in a data group with weight values, the display of actual values is prevented and the data is anonymized. Deviation is applied equally to each value.</p> <p><b>Micro Merging:</b> In the micro-merging method, all data will first be sorted into statistically significant groups (such as from large to small), and the value obtained by taking the average of the groups will be written in place of the relevant data in the current group, thus providing anonymization. For example, for salary information; If two groups of TRY 10,000 or more are created, the sum of the salaries of those who earn TRY 10,000 or less is divided by the number of people and this value is written into the salary set of those who earn less than TRY 10,000.</p> <p><b>Data Exchange:</b> The values of a variable are exchanged between the selected pairs among the data stored in the data exchange method. The purpose of this method, which is used for data that can be categorized in general, is to transform the database by exchanging the data of the relevant person.</p>

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**9. TITLE, DEPARTMENT AND POSITION OF THOSE INVOLVED IN THE DATA STORAGE AND DESTRUCTION PROCESS**

All units and employees of the Company actively support the departments in charge in the duly implementation of the technical and administrative measures taken by the responsible departments within the scope of the Policy, the training of the employees of the department and increasing their awareness, their monitoring and continuous auditing, thus preventing the illegal processing of personal data, unlawful access to personal data and ensuring data security in all environments where personal data are processed in order to ensure legal storage. The distribution of the titles, departments and job descriptions of those involved in the storage and destruction processes of personal data is shown in the table below (*Table 6*) .

*(Table 6: Distribution of Tasks for Retention and Destruction Processes)*

<b>TITLE</b>	<b>DEPARTMENT</b>	<b>POSITION</b>
General Manager	Head Office of TUSAŞ Engine Sanayii A.Ş.	It is responsible for the company's employees to act in accordance with the Policy and to carry out the PDP process within the company.
Information Security Management Systems Committee (ISMS)	Head Office of TUSAŞ Engine Sanayii A.Ş.	It is responsible for the preparation, execution, publication and updating of the Policy in relevant environments and organizing internal audits.
Information Technologies Manager	Directorate of Information Technologies	It is responsible for providing the technical solutions needed in the implementation of the policy.
Human Resources and Administrative Affairs Director, Legal Consultant, Facilities and Security Manager, Contracts Manager, Financial Affairs Manager, Department of İDDK, Human Resources Manager Administrative Affairs Manager,	Other Departments	S/he is responsible for the execution of the Policy in accordance with his/her duties.

**10. OTHER ISSUES**

This Policy is published in two different media, one is on printed paper as wet signed and the other is on the Company's website. [www.tei.com.tr](http://www.tei.com.tr).

**TUSAŞ ENGINE INDUSTRIES, INC.**  
**POLICY ON STORAGE AND DESTRUCTION of PERSONAL DATA**

This Policy is updated in accordance with the amendments made in the law, the Board decisions or in cases that require updating, such as developments in the sector and informatics, and/or when needed. The changes made within this scope are immediately entered into the text and explanations regarding the amendments are recorded in the "Amendment Table" at the end of the policy.

This Policy and amendments made to the Policy within the scope of the update are deemed to have entered into force after they are published on the company's website.

<b>TABLE OF AMENDMENTS</b>		
<b>Article number</b>	<b>Date of Change</b>	<b>Description</b>