

PERSONAL DATA RETENTION AND DISPOSAL POLICY

IC INTECHRON TEKNOLOJİ TİCARET ANONİM ŞİRKETİ

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1. Purpose, Scope and Legal Basis

This Policy sets out the principles governing the retention and the deletion, destruction or anonymization of personal data processed by IC Intechron in connection with the website, communication/quotation, job applicant and candidate pool, reference, newsletter/corporate communication, web security and data subject application processes.

This Policy has been prepared on the basis of Law No. 6698 on the Protection of Personal Data, the Regulation on the Deletion, Destruction or Anonymization of Personal Data and other applicable legislation.

2. Definitions

Term	Definition
Disposal	Deletion, destruction or anonymization of personal data.
Recording Medium	Any medium in which personal data is processed wholly or partly by automated means, or by non-automated means provided that it forms part of a data filing system.
Periodic Disposal	The deletion, destruction or anonymization process carried out ex officio at recurring intervals specified in this Policy when all conditions for processing personal data cease to exist.
Deletion	Making personal data inaccessible and non-reusable in any way for the relevant users.
Destruction	Making personal data inaccessible, irretrievable and non-reusable by anyone in any way.
Anonymization	Rendering personal data impossible to associate with an identified or identifiable natural person, even by matching it with other data.

3. Recording Media

- Web applications, forms and databases.
- Corporate e-mail, collaboration and secure file storage areas.
- Recruitment/candidate tracking system, if used.
- Newsletter/e-mail delivery and communication consent management systems.
- Backup, access, logging and information security systems.
- Corporate workspaces accessible to authorized users.
- Physical application and document files, where applicable.

4. Reasons Requiring Retention and Disposal

Personal data is retained for as long as there are retention obligations under applicable legislation, contractual and operational requirements, information security requirements, the need for the establishment, exercise or protection of a right, or other valid processing conditions under the Law.

The disposal process is initiated where the purpose and legal ground requiring processing cease to exist, the applicable statutory retention period expires, consent is withdrawn for an activity based solely on explicit consent and no other legal ground for retention exists, or a legally compliant disposal request of the data subject is accepted.

5. Retention Periods

Process	Record	Maximum Retention Period
Communication / quotation / request	Request and communication records	2 years from completion of the request. If a contractual or legal relationship arises, the retention period applicable to that process shall apply.
Job applicant - current application	CV/resume, application, interview and assessment records	2 years from completion of the application process.
Candidate pool	CV/resume, contact, education/experience and suitable-position assessment records	Up to 2 years from the date of explicit consent; if consent is withdrawn earlier, candidate-pool processing is terminated.
Reference person	Business contact details and reference interview records	2 years from completion of the relevant applicant's application process.
Data subject application	Application, identity verification and response records	3 years from completion of the application.
Newsletter subscription	E-mail address and active subscription record	For as long as the subscription/consent remains valid; active sending ends upon refusal or unsubscribe.
Commercial electronic communication consent/refusal record	Consent, refusal and evidentiary records	1 year from expiry of the consent; other records relating to commercial electronic communications are retained for 1 year from the record date.
Cookie preference record	Preference categories, text/panel version and timestamp	For the validity period of the preference; evidentiary record for 3 years from the last change.
Web / transaction security logs	Access and security records	Up to 1 year, limited to information security needs and applicable legislation; where a specific legal ground requires longer retention, the relevant period applies.
Privacy notice / explicit consent transaction record	Displayed text version, date-time and preference record	3 years from termination of the relevant processing activity.
Disposal operation records	Deletion, destruction and anonymization records	At least 3 years in accordance with applicable legislation.

Where applicable legislation expressly prescribes a longer retention period, or where longer retention is mandatory due to a specific legal dispute, audit, investigation or the establishment, exercise or protection of a right, the relevant record shall be retained only for the period and scope required by that legal ground.

6. Periodic Disposal

Within the scope of IC Intechron's obligation to prepare a personal data retention and disposal policy, the periodic disposal interval is set at six months. Periodic disposal is carried out in January and July. Between the date on which the disposal obligation arises and the periodic disposal date, access to the relevant data is restricted to persons whose access is required for the retention purpose.

Where a data subject's request for deletion or destruction is accepted, the periods prescribed by applicable legislation apply separately; the request does not require waiting for the periodic disposal period.

7. Disposal Methods

Method	Implementation Principle
Deletion	Revocation of access rights, making application/database records unavailable to relevant users, and other appropriate technical methods.
Destruction	Depending on the nature of the medium, secure erasure, physical destruction, destruction of cryptographic keys or other methods that render the data irretrievable.
Anonymization	Masking, aggregation, variable reduction and other suitable anonymization methods ensuring that the data can no longer be associated with the data subject.

8. Technical and Administrative Measures

- Retention periods are monitored by process and data category.
- Deletion, destruction and anonymization operations are performed only by authorized persons.
- Access rights are managed on the basis of duty and need; authorizations of users who leave the Company or change duties are reviewed without delay.
- Backups, archives and logging systems are managed in accordance with the data lifecycle.
- Data security and disposal obligations are contractually regulated with service providers.
- Records relating to disposal operations are retained for at least 3 years, without prejudice to other legal obligations.

9. Duties and Responsibilities

Unit	Responsibility
Human Resources	Monitors retention periods for job applicant, candidate pool and reference records; ensures implementation of requests to withdraw candidate-pool consent.
IT / Information Security	Implements technical retention, access, backup, logging and secure disposal mechanisms; supports retention periods in technical systems.
Legal / Compliance	Assesses legal grounds for retention and data subject requests; monitors alignment between this Policy and the personal data processing inventory.
Relevant Business Units	Monitors the necessity and retention period of records within their processes and refers expired records to the disposal process.

10. Effective Date

This Policy was published on 13.08.2026. It shall be updated where there are changes in legislation, the personal data processing inventory, retention periods or technical infrastructure.