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Stillnook Personal Data Storage and Destruction Policy

1. Purpose

This policy regulates the storage and destruction of personal data collected and processed by Stillnook. This policy has been prepared to ensure compliance with the relevant legislation concerning the processing of personal data by Stillnook and to safeguard the protection of personal data.

2. Scope

This policy encompasses all personal data processing activities carried out by Stillnook. Within this scope, all personal data collected and processed by Stillnook are subject to this policy.

3. Definitions

- Personal data: Any kind of information relating to an identified or identifiable natural person.
- Personal data processing: Any operation or set of operations which is performed upon personal data, whether or not by automated means, such as collection, recording, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure, or destruction.
- Personal data storage: The retention of personal data for the period prescribed by relevant legislation or for the purpose for which they were processed.
- Personal data destruction: The deletion, destruction, or anonymization of personal data in accordance with relevant legislation.

4. Storage Periods for Personal Data

Stillnook retains personal data for the period prescribed by relevant legislation or for the period necessary for the purpose for which they were processed. These periods are determined as follows under the relevant legislation:

- Personal data processed within the scope of employment contracts: 10 years from the termination of the employment contract
- Personal data of customers: 10 years from the termination of the customer relationship
- Personal data of company employees: 50 years from the termination of the employment relationship
- Personal data of business partners: 10 years from the termination of the business relationship

When determining the storage periods for personal data, Stillnook also considers the following:

- The purposes of personal data processing
- The type and scope of data processing activities
- The significance of the results obtained from data processing activities

- The contribution of data processing activities to Stillnook's legitimate interests

5. Methods of Personal Data Destruction

When destroying personal data, Stillnook employs the following methods in compliance with relevant legislation:

- Physical destruction: Personal data is physically destroyed. This method involves the physical destruction of personal data, such as by burning, using destruction machines, or physically shredding.
- Technical destruction: Personal data is technically destroyed. This method involves the electronic destruction of personal data, such as by deletion, destruction, or anonymization.

Before the destruction of personal data, Stillnook considers the following:

- The necessity of personal data destruction
- The scope of personal data to be destroyed
- Informing the relevant individuals
- Taking necessary security measures regarding the destruction of personal data

6. Audit and Monitoring of Personal Data Storage and Destruction Processes

Stillnook regularly audits and monitors the processes of personal data storage and destruction. In this context, Stillnook considers the following:

- Taking into account the prescribed periods by relevant legislation in determining the storage periods of personal data
- Storing personal data only for the period prescribed by relevant legislation or for the period necessary for the purpose for which they were processed
- Informing relevant individuals and taking necessary security measures regarding the destruction of personal data

Stillnook takes necessary administrative and technical measures to ensure the audit and monitoring of personal data storage and destruction processes.