KYOCERA Bilgitaş Turkey Doküman Çözümleri A.Ş.

PERSONAL DATA RETENTION AND DISPOSAL POLICY

1. INTRODUCTION

1.1. Objective

1.1.1. The Personal Data Retention and Disposal Policy (Policy) is prepared to determine the rules and principles related to the retention and disposal activities within scope of the personal data processing operations by **Kyocera Bilgitaş Turkey Doküman Çözümleri A.Ş.** (**COMPANY**).

1.2. Scope

1.2.1. The personal data of the Company's current and former employees, job applicants, interns, customers, prospective customers, dealers and dealer representatives, suppliers, supplier employees, business partners, visitors, and other relevant individuals are within the scope of this Policy. This Policy applies to all electronic and physical record-keeping environments owned by or managed on behalf of the Company in which personal data are processed, as well as to personal data processing activities carried out by the Company or by third parties on behalf of the Company.

1.3. Enforcement

1.3.1. The Policy and the policy updates are entered into force when they are published at the website of the **COMPANY**.

1.4. Definitions

DEFINITION	DESCRIPTION
Explicit Consent	A consent related to a certain subject, based on notification and given by freewill
Employee	Employees working at the **COMPANY**
Data Subject (Relevant Person)	Real person whose personal data is processed
Authorized User (Relevant User)	Persons who process the personal data within the data controller organization or in accordance with the authorization and instruction given by the data controller except the person or unit responsible for the retention, protection and back-up of the data technically.
Law	Personal Data Protection Law No. 6698
Recording medium	All kinds of mediums where the personal data processed by automatic or nonautomatic methods wholly or partly on condition that it is a part of a data recording system
Personal Data	All kinds of information related to a real person whose identity is determined or may be determined

Personal Data Processing Inventory	A document which contains personal data processing activities carried out in connection with the business processes by the data controllers, the purpose of processing of personal data, data category, maximum period which is required for the purposes of processing of the personal data and which is determined by associating with the transferred receiver group and the person group of the data, the personal data which are anticipated to be transferred to foreign countries and the measures taken for the data security.
Disposal of Personal Data	Deletion, anonymization or destruction of personal data
Council	Council of Protection of Personal Data
Sensitive Personal Data	Data on race, ethnic origin, political opinion, philosophical beliefs, religion, denomination or other beliefs, appearance, association, foundation and union membership, health, sexual life, criminal conviction and security measure of the people and biometric and genetic data
Periodical Disposal	Deletion, destruction or anonymization to be performed periodically and ex officio which is determined in the personal data retention and disposal policy in case that the conditions of personal data processing in the law are no longer existed.
Data Recording System	The recording system where personal data is configured and processed according to certain criteria
VERBİS (Data Registry Information System)	The information system which is used for application to the Registry and in other transactions related to the Registry by the data controllers, accessed via internet, established and managed by the Turkish Data Protection Authority
Data Processor	real or legal person who processes the Personal Data based on the authority given by the Data Controller
Data Controller	real or legal person who is responsible for establishing and managing of data recording system which defines the purpose and tools of processing Personal Data.

2. RESPONSIBILITY AND DISTRIBUTION OF TASKS

2.1. All units and employees at the **COMPANY** must implement the Policy and follow the rules in the Policy.

2.2. The distribution of tasks in retention and disposal of the personal data is mentioned below.

Personnel	**Unit**	**Task definition**
Senior Consultant	Operation	Disposal of the personal data.
Lawyer	Law	To receive the requests of the Relevant Person (Data Subject), to control whether the requests are duly sent and to answer the requests.
Technical Services Manager	Technical Services Directorate	Providing conformity of the processes within his task definition to the retention period, management of the periodical disposal process, performing audit and controls required to answer the Relevant Person (Data Subject)' requests, disposal process of the personal data in the electronic environment.
Financial Affairs Personnel	Financial Affairs	Providing conformity of the processes within his task definition to the retention period, management of the disposal process of the personal data according to the periodical disposal period.
Human Resources Personnel	Human Resources	Providing conformity of the processes within his task definition to the retention period, management of the disposal process of the personal data according to the periodical disposal period.

3. RETENTION OF PERSONAL DATA

3.1. Legal Reasons Requiring Retention

3.1.1. The personal data held by the **COMPANY** is stored within the framework of the legislation mentioned in **Table 1**.

3.2. Environments on where Personal Data is stored

3.2.1. The personal data held by the **COMPANY** is stored in the environments mentioned in **Table 2**.

3.3. Purposes of Storing

3.3.1. The personal data held by the **COMPANY** is stored in the environments mentioned in **Table 3.**

3.4. Retention Periods

3.4.1. The personal data held by the **COMPANY** is stored in the environments mentioned in **Table 4**.

4. DISPOSAL OF PERSONAL DATA

4.1. Reasons for Disposal

4.1.1. The personal data is disposed if the below mentioned reasons are existed.

- When the purpose requiring it to be processed or stored is eliminated, the data is exterminated on the first periodical disposal period.
- In case the personal data processing is only performed referring to the explicit consent condition, it is exterminated immediately after the Relevant Person (Data Subject)'s withdraw the explicit consent.
- If the application related to the disposal and destruction of the personal data within the framework of the rights of the Relevant Person (Data Subject) in accordance with the article 11 of the law is accepted by the **COMPANY**, the data is immediately destroyed.
- If the council decides to exterminate the data, it is immediately exterminated.
- If there is no condition justifying the retention of the personal data for a longer time, it is exterminated on the first periodical disposal period.

4.2. Disposal Period of the Personal Data

4.2.1. The procedure to be followed to exterminate the personal data is mentioned below.

- The personal data to be disposed is determined in the Personal Data Processing Inventory.
- The groups of the Relevant Users in the Personal Data Processing Inventory are detailed based on person/role.
- The authorizations and methods of the Relevant Users such as access, retrieval, reuse are determined.
- To remove authorizations and methods of access, retrieval and reuse of the Relevant Users within the scope of the personal data, to dispose and keep logs of the data to be exterminate.
- If the disposal process is required, the disposal is performed immediately or in months of April and October which is periodical disposal date.

4.2.2. Methods for Erasure of Personal Data

4.2.2.1. Software as a Service (SaaS) Type Cloud Solutions (such as Google Suite, Google Drive)

In case the personal data held by the **COMPANY** is processed in the cloud system applications, it is permanently deleted by the Relevant User. The Relevant User has no authorization to retrieve the data on the cloud system.

4.2.2.2. Personal Data in Paper Media

The personal data which is held by the **COMPANY** on paper is destroyed by making it invisible to the users by using indelible ink.

4.2.2.3. Office Files held in the central server

If the Relevant User has authorization to delete the personal data in the file permanently, the relevant user can permanently delete it by the deletion instruction in the operating system of the file. If the user has no authorization to delete, the access rights of the Relevant User on the index of the file are removed. When such transactions are carried out, the necessary measures are taken to ensure that the Relevant User is not the system manager.

4.2.2.4. Personal Data on Portable Devices

The personal data held by the **COMPANY** in the portable devices is stored as encrypted and the personal data on such portable devices are deleted by using appropriate software.

4.2.2.5. Databases

The personal data held in the databases of the **COMPANY** are deleted by the database instructions. When carrying out such transaction, it is ensured that the Relevant User is not the database manager.

4.2.3. Disposal Methods of the Personal Data

4.2.3.1. Demagnetizing Local Systems

When the magnetic media is passed through a special device and exposed to a magnetic field at an extremely high level, the data on that device is permanently deteriorated.

4.2.3.2. Physical Destruction of Local Systems

The optical media and magnetic media are melted, burned or crushed into powder and destroyed physically.

4.2.3.3. Overwriting Local Systems

It is a transaction to prevent the old data to be recovered by writing data consisting 0’s and 1’s at least seven times on the magnetic media and rewritable optical media. This transaction is performed by using special software.

4.2.3.4. Portable devices

If the flash based hard disks of which have ATA (SATA, PATA etc.) and SCSI (SCSIExpress etc.) interfaces are supported, the deletion instruction is used if not, the disposal method suggested by the manufacturer is used or one or several methods mentioned in the Local Systems part are used.

4.2.3.5. Magnetic Tape

These are the fields which are used to store the data on a flexible tape with the help of micro magnet parts. They need to be exposed to very strong magnetic fields and demagnetized or the physical disposal methods such as burning, melting etc. should be used.

4.2.3.6. Units such as Magnetic Discs

These are the fields which stores the data on flexible (plate) or fixed medias with the help of the micro magnet parts. They need to be exposed to very strong magnetic fields and demagnetized or the physical disposal methods such as burning, melting etc. should be used.

4.2.3.7. Mobile Phones (Sim Cards and Fixed Memory Fields)

The smart phones have deletion instruction in the fixed memory fields, however, most of them has no destruction instruction. They need to be exterminated by using one or several methods mentioned in the Local Systems.

4.2.3.8. Optical disks

These are the data storage fields such as CD, DVD. They need to be exterminated by using physical destruction such as burning, cutting into small pieces, melting etc.

4.2.3.9. Papers, Microfiche and Similar Medias

The paper destruction machines or paper shredders are used to exterminate the personal data on papers, microfiche and similar medias.

4.2.4. Anonymization Technics of Personal Data

4.2.4.1. Masking

This is the method of anonymization of the personal data by removing the basic determining information from the data set with data masking.

"Removing information such as name, ID number etc. information which provides a definition of the Relevant Person (Data Subject) and transforming into a data set which makes impossible to determine the Relevant Person (Data Subject)."

"Putting asterisks on a part of the credit card number of the person is an example of masking. (0998 **** **** 8906)"

4.2.4.2. Aggregation

Many data are aggregated with the method of data aggregation and the personal data is made unidentifiable.

"Without specifying the ages of the employees, there are Z employees at the age of X."

"The number of the female employees within the **COMPANY** is Z and the data such as 40% of the number is graduate, 60% have master's degree is anonymized."

4.2.4.3. Data Derivation

A general content is created more than the personal data with the data derivation method and the personal data is made unidentifiable.

"In case the age of the person is directly written instead of the details of Day/Month/Year of the birth date information, it is anonymized by data derivation."

4.2.4.4. Data Mixing

The connection between the values and the persons by mixing the data in the personal data set by using data mixing method.

"The quality of the voice records are changed, thus there is no link between the voices and the Relevant Person (Data Subject)."

"In a class of which age average is calculated, when the values specifying the ages of the persons are exchanged, the data mixing method is used."

5. ADMINISTRATIVE AND TECHNICAL MEASURES

5.1. Technical Measures

5.1.1. The personnel are employed at the **COMPANY** by using authorized personnel or outer sources all the time.

5.1.2. The databases and software/hardware storing units and similar technical infrastructure where your personal data will be stored are created and used.

5.1.3. Personal Data Processing Inventory will be created, all personal data processed are determined and the risks and threats which may arise from processing of such data are determined.

5.1.4. The risky situations are reevaluated and the necessary technological solutions are created.

5.1.5. The relevant software and systems, including virus protection systems and software and hardware containing security walls, are created.

5.1.6. The technical infrastructures and audit mechanisms and technical measures are created to exterminate the personal data in a secure way and the appropriate disposal method is determined.

5.1.7. The employees having technical expertise in disposal of the personal data are recruited or outer technical support is taken in such cases.
5.1.8. The data on papers are exterminated by the paper shredders. Such machines are located in places where the data processors can easily use.
5.1.9. The access authorizations are created and checked at all times.
5.1.10. The same policy is created for the security of the sensitive personal data.
5.1.11. The employees within the sensitive personal data processing procedures are trained about the sensitive personal data security, the confidentiality contracts are signed and the authorizations of the users who have access authorization to the data are determined.
5.1.12. The electronic media which sensitive personal data is processed, stored and/or accessed is secured by using cryptographic methods; the cryptographic keys are kept in secured places, all transaction records are logged, the security updates of the media are followed at all times, the necessary security tests are periodically performed and the test results are recorded.
5.1.13. The necessary security measures of the physical media which sensitive personal data is processed, stored and/or accessed are taken and the physical security is provided and the unauthorized access is prevented.
5.1.14. If the sensitive personal data needs to be transferred via e-mail, the data is transferred encrypted to the official e-mail address or by using KEP account. If it needs to be transferred via media such as flash memory, CD, DVD etc., the data is encrypted by using cryptographic methods and the cryptographic key is kept in another place. If the transfer is performed between the servers in different physical environments, the data transfer is performed by installing VPN between the servers or sFTP method. If the data needs to be transferred on paper, the measures are taken against risks such as stealing, losing or seeing by unauthorized persons and the paper is sent in "confidential" form.

5.2. Administrative Measures

5.2.1. The awareness activities and trainings are performed for storing the personal data lawfully.
5.2.2. All processes related to the data processing activities within the **COMPANY** are analyzed based on the relevant units, in this context, a Personal Data Processing Inventory is prepared by each unit and they are stored in a single data inventory.
5.2.3. The policy and the procedures to be implemented in the process of the personal data processing are created and applied.
5.2.4. The studies related to reducing personal data processed are carried out.
5.2.5. Where cooperation is required for the storage of personal data, we include provisions in the contracts entered into with the real or legal persons to whom personal data is transferred, stipulating that such persons must take the necessary security measures to ensure the protection and secure storage of the personal data transferred.
5.2.6. We sign confidential contracts with the real/legal persons from whom we provide service and who transfer personal data to our company and we ensure that such data is lawfully transferred by such contracts.
5.2.7. The provisions related to taking necessary security measures are added to the contracts signed with the persons to whom the personal data is transferred in order to protect the personal data.

5.2.8. It is checked whether the disposal processing of the personal data is performed on time and the related records are taken or not by the help of the audit mechanisms.
5.2.9. Before processing the personal data, the clarification obligation related to the Relevant Person (Data Subject)s is fulfilled by the **COMPANY**.

TABLE 1: Legislation Requiring Retention

Ground
1774 OF IDENTITY NOTIFICATION LAW
4857 OF LABOR LAW
5510 OF SOCIAL SECURITY AND GENERAL HEALTH INSURANCE LAW
6102 OF TURKISH COMMERCIAL CODE
6331 OF OCCUPATIONAL HEALTH AND SAFETY LAW
6698 OF LAW A.5/1 (EXPLICIT CONSENT)
6698 OF LAW A.5/2-A (EXPLICITLY STIPULATED BY THE LAWS)
6698 OF LAW A.5/2-C (OBLIGATORY FOR FULFILLING OF CONTRACT)
6698 OF LAW A.5/2-Ç (OBLIGATORY FOR LEGAL OBLIGATION)
6698 OF LAW A.5/2-E (OBLIGATORY FOR ESTABLISHMENT, EXERCISE OR PROTECTION OF A RIGHT)
6698 OF LAW A.5/2-F (OBLIGATORY FOR LEGITIMATE INTEREST)
6698 OF LAW A.6/3-A (EXPLICIT CONSENT) (SENSITIVE DATA)
6698 OF LAW A.6/3-B (EXPLICITLY ANTICIPATED IN THE LAWS)
6698 OF LAW A.6/3-F (OBLIGATORY FOR LEGAL OBLIGATION)
6698 OF LAW A.8/2 (DATA TRANSFER EXEMPTION)
6698 OF LAW A.9/6-A (EXPLICIT CONSENT)

TABLE 2: Retention Environment

Electronic Environment	Nonelectronic Environment
• Servers • Software (Office software etc.) • Information Security Hardware and Software • Personal Computers • Mobile Devices • Optic Disks (CD, DVD etc.) • Portable Memories (USB, Memory Card etc.) • Printer, Scanner, Photocopier	• Paper • Manual Data Recording Systems • Written, Printed, Visual Environments

TABLE 3: Purposes of Retention

Purposes
PERFORMING OF INFORMATION SECURITY PROCESSES
FULFILLING OF OBLIGATIONS ARISING OUT OF THE LABOR CONTRACT AND LEGISLATION FOR EMPLOYEES
PERFORMING OF PROCESSES OF VESTED RIGHTS AND BENEFITS FOR EMPLOYEES
OTHER- PERFORMING AND MANAGING OF DISCIPLINARY PROCEEDING PROCESSES
OTHER- PERFORMING AND MANAGING OF RETIREMENT PROCESSES
OTHER- PERFORMING AND MANAGING OF ACCESS CONTROL AND AUTHORIZATION
OTHER- PERFORMING OF IP MANAGEMENT PROCESSES
OTHER- PERFORMING AND MANAGING OF JOB APPLICATION PROCESSES
OTHER- PERFORMING AND MANAGING OF OCCUPATIONAL ACCIDENT PROCESSES
OTHER- PERFORMING AND MANAGING OF RECRUITMENT / PERSONNEL FILE CREATION PROCESSES
OTHER- PERFORMING AND MANAGING OF SALARY PAYMENT PROCESSES
OTHER- FOR THE PURPOSE OF TECHNICAL SUPPORT PROCESSES
OTHER – FOR PERFORMING OF MAINTENANCE-REPAIR OPERATION PROCESSES
OTHER – FOR FRANCHISE DEVICE DELIVERY PROCESSES
OTHER – FOR COMPLETION OF FRANCHISE CONTRACTS
OTHER – FOR OBTAINING INFORMATION OF THE FRANCHISE MEETING ATTENDANTS
OTHER – FOR OBTAINING FRANCHISE REQUESTS
OTHER – FOR PERFORMING OF AUDIT PROCESSES
OTHER – PERFORMING AND MANAGING OF GENERAL MEETINGS
OTHER – FOR FOLLOW-UP ACCIDENT PROCESSES
OTHER - PERFORMING AND MANAGING OF THE ACTIVITIES OF THE COMPANY'S SOCIAL MEDIA ACCOUNTS
OTHER – FOR OBTAINING AVAILABLE FRANCHISE TARGET PLANNING INFORMATION
OTHER - FOR COLLECTING INFORMATION IN ORDER TO PRESENT THE AVAILABLE CUSTOMERS AS REFERENCES
OTHER – FOR OBTAINING REQUESTS OF THE CUSTOMER CANDIDATES
OTHER – PERFORMING OF PDKS PROCESSES
OTHER – FOR COMPLETING REPORTING PROCESSES
OTHER – FOR DELIVERY NOTE PROCESSING
OTHER – FOR COMPLETING OF TRAVEL PLANNING PROCESSES
OTHER – FOR PERFORMING INTERNSHIP PROCESSES
OTHER – FOR FOLLOW-UP STOCKTAKING PROCESSING
FOR PERFORMING TRAINING PROCESSES
PERFORMING OF ACCESS AUTHORIZATION
PERFORMING OF FINANCE AND ACCOUNTING TRANSACTIONS
FOR PROVIDING PHYSICAL ENVIRONMENT SECURITY
PERFORMING OF COMMUNICATION ACTIVITIES
PERFORMING / AUDIT OF OCCUPATIONAL ACTIVITIES
PERFORMING OF OCCUPATIONAL HEALTH / SECURITY ACTIVITIES
PERFORMING OF GOODS – SERVICE SALE PROCESSES
PERFORMING OF GOODS – SERVICE PURCHASE PROCESSES
PROVIDING SECURITY OF MOVABLE PROPERTIES AND RESOURCES
PROVIDING SECURITY OF THE OPERATIONS OF THE DATA CONTROLLER
GIVING INFORMATION TO THE AUTHORIZED PERSONS, INSTITUTIONS AND ASSOCIATIONS

TABLE 4: Retention Periods

Relevant Person (Data Subject)	Retention Period
EMERGENCY CONTACT LIST PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
CANDIDATE PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
TRANSFER CONTRACT PROCESS RELEVANT PERSON (DATA SUBJECT)	101 YEARS
ACTIVE INDEX PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
ANTIVIRUS PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 1 DAY)
VEHICLE GPS TRACKING PROCESS RELEVANT PERSONNEL	5 YEARS
VEHICLE ACCIDENT PROCESS RELEVANT PERSONNEL- RELEVANT PERSON (DATA SUBJECT) INVOLVED IN AN ACCIDENT	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERSONNEL RESIGNED DUE TO MILITARY SERVICE	OTHER (ACTIVITY PERIOD+ 10 YEARS)
ADVANCE REQUEST APPROVAL PROCESS RELEVANT AUTHORIZED PERSON	OTHER (ACTIVITY PERIOD+ 10 YEARS)
EMPLOYEE REQUESTING ADVANCE	OTHER (ACTIVITY PERIOD+ 10 YEARS)
DEALER DEVICE DELIVERY PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
DEALER TARGET PLANNING PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 5 YEARS)
DEALER TRAVEL PROCESS WITHIN CAMPAIGN RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 7 DAYS)
DEALER PAYMENT PROCESS RELEVANT DEALER OFFICIAL	101 YEARS
DEALER CONTRACT PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 5 YEARS)
RELEVANT PERSON (DATA SUBJECT) REQUESTING DEALERSHIP	OTHER (ACTIVITY PERIOD+ 10 YEARS)
BENEFIT MULTISPORT CARD DESIGNATION PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 DAY)
ISMS TRAINING PROCESS TRAINEE	OTHER (ACTIVITY PERIOD+ 2 YEARS)
ISMS EVENT INTERVENTION PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
ISMS AUDIT PROCESS UNIT AUTHORIZED PERSON	OTHER (ACTIVITY PERIOD+ 2 YEARS)
ISMS AUDITOR	OTHER (ACTIVITY PERIOD+ 2 YEARS)
ISMS MANAGEMENT REVIEW (MR) PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
INFORMATION OBTAINING PROCESS CUSTOMER REPRESENTATIVE	101 YEARS
INFORMATION SECURITY MANAGEMENT SYSTEM PAPER VALIDITY PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)

IT SUPPLIER	OTHER (ACTIVITY PERIOD+ 2 YEARS)
IT ASSET LIABILITY PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 1 YEAR)
MANAGEMENT OF CORPORATE CONTENT USED IN THE CLOUD USER DESIGNATION PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 YEAR)
RELEVANT CUSTOMER CANDIDATE VIA CALL CENTER	30 DAYS
DEMO PROCESS RELEVANT PERSON (DATA SUBJECT) (BULUT)	OTHER (ACTIVITY PERIOD+ 1 YEAR)
DEMO PROCESS RELEVANT PERSON (DATA SUBJECT) (CUSTOMER SERVER-LOCAL)	OTHER (ACTIVITY PERIOD+ 1 YEAR)
AUDIT PROCESS RELEVANT INTERNAL AUDITOR	101 YEARS
RELEVANT PERSONNEL HAVING DISCIPLINARY INVESTIGATION	OTHER (ACTIVITY PERIOD+ 10 YEARS)
DISCIPLINARY INVESTIGATION PROCESS RELEVANT WITNESS	OTHER (ACTIVITY PERIOD+ 10 YEARS)
CORRECTIVE AND PREVENTIVE ACTION (CAPA) PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
E-MAIL SECURITY PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
RELEVANT PERSON (DATA SUBJECT) FOR WHOM AN E-MAIL ACCOUNT IS OPENED	OTHER (ACTIVITY PERIOD+ 6 AY)
TRAINING PROCESS RELEVANT PERSONNEL	10 YEARS
RETIREMENT PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
SIMULTANOUS TRANSLATION APPLICATION PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 1 YEAR)
PERSONNEL WHO RESIGNED DUE TO MARRIAGE	OTHER (ACTIVITY PERIOD+ 10 YEARS)
RELEVANT PERSONNEL FOR WHOM AN INVOICE IS MADE OUT	OTHER (ACTIVITY PERIOD+ 10 YEARS)
INVOICE PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERSONNEL WHO ARE TERMINATED DUE TO TERMINATION	OTHER (ACTIVITY PERIOD+ 10 YEARS)
FINDEKS - CRIF FINANCIAL DATA INQUIRY PROCESS RELEVANT AUTHORIZED PERSON	101 YEARS
GENERAL MEETING PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
GSM LINE DESIGNATION PROCESS RELEVANT PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
FIREWALL PROCESS RELEVANT PERSON (DATA SUBJECT)	2 YEARS
RELEVANT PERSON (DATA SUBJECT) ON THE SECURITY CAMERA FRAME	40 DAYS
TERMINATION PROCESS PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
CURRENT ACCOUNT OPENING PROCESS, WHEN NECESSARY, AFTER INVESTIGATION RELEVANT AUTHORIZED PERSON OF THE COMPANY	101 YEARS

IP USAGE PROCESS RELEVANT PERSON (DATA SUBJECT)	2 YEARS
RESIGNING PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
EXEMPTIONAL CONTRACT APPROVAL PROCESS RELEVANT AUTHORIZED PERSON OF THE COMPANY	101 YEARS
RETENTION OF OCCUPATIONAL SAFETY DOCUMENTS RELEVANT PERSONNEL WHO WILL WORK ON BUILDING RENOVATION	OTHER (ACTIVITY PERIOD+ 10 YEARS)
OCCUPATIONAL SAFETY EQUIPMENT DELIVERY PROCESS RELEVANT PERSONNEL	101 YEARS
PERSONNEL HAVING AN OCCUPATIONAL ACCIDENT	OTHER (ACTIVITY PERIOD+ 10 YEARS)
OCCUPATIONAL ACCIDENT PROCESS RELEVANT WITNESS	OTHER (ACTIVITY PERIOD+ 10 YEARS)
OCCUPATIONAL HEALTH AND SAFETY TRAINING PROCESS OHS EXPERT – ONSITE DOCTOR AND EMPLOYER'S REPRESENTATIVE	10 YEARS
OCCUPATIONAL HEALTH AND SAFETY TRAINING PROCESS PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERSONNEL REQUESTING LEAVE	OTHER (ACTIVITY PERIOD+ 10 YEARS)
POLICE STATION NOTIFICATION RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 DAY)
COMMISSION INVOICE PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
EXCHANGE DIFFERENCE – RETURN INVOICE REQUEST RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
COMPANY ACADEMIY USER DESIGNATION PROCESS PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 DAY)
LOG RECORD PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
CORPORATIONAL CONTENT MANAGEMENT USER DESIGNATION USED LOCALLY RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 YEAR)
PERSONNEL WHOSE SALARY PAYMENT IS MADE	OTHER (ACTIVITY PERIOD+ 10 YEARS)
RELEVANT AUTHORIZED PERSON TO BE COMMUNICATED AT HE MACHINERY TRANSFER AND DELIVERY PROCESS	101 YEARS
AVAILABLE CUSTOMER REFERENCE PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 7 DAYS)
AVAILABLE CUSTOMER REFERENCE PROCESS RELEVANT PERSON (DATA SUBJECT) WHOSE PHOTO IS SHARED	OTHER (ACTIVITY PERIOD+ 7 DAYS)
CUSTOMER SERVICES PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 1 DAY)
CUSTOMER AND DEALER CURRENT ACCOUNT OPENING PROCESS RELEVANT AUTHORIZED PERSON	101 YEARS
CAR PARKING ENTRY – EXIT PROCESS RELEVANT PERSON (DATA SUBJECT)	1 YEAR

PAYMENT PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
UNPAID INVOICE PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERSONAL FILE CREATION PROCESS RELEVANT DISABLED PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERSONAL FILE CREATION PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERSONAL FILE CREATION PROCESS RELEVANT DRIVER PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PDKS PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
PERIODICAL BUILDING MAINTENANCE AND REPAIR PROCESS RELEVANT FIRM PERSONNEL – COMPANY PERSONNEL	101 YEARS
PERIODICAL EXAMINATION PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
POTENTIAL PRODUCT AND -OR SERVICE RECIPIENT	OTHER (ACTIVITY PERIOD+ 10 YEARS)
REPORTING PROCESS RELEVANT PERSON (DATA SUBJECT)	101 YEARS
SWITCHBOARD (PBX) PROCESS RELEVANT PERSON (DATA SUBJECT)	1 YEAR
SWITCHBOARD (PBX) PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 DAY)
PROCESS OF ALLOCATING OF TROLLEY REQUEST RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
RELEVANT PERSON (DATA SUBJECT) ON THE SECURITY CAMERA FRAME WHOSE AUDIO IS RECORDED	40 DAYS
DELIVERY NOTE PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 7 YEARS)
ORDER PLACING PROCESS RELEVANT COMPANY AUTHORIZED PERSON	101 YEARS
SYSTEM ROOM ENTRY – EXIT PROCESS RELEVANT PERSON (DATA SUBJECT)	1 YEAR
RELEVANT PERSON (DATA SUBJECT) WHOSE DATA IS SHARED ON SOCIAL MEDIA	101 YEARS
CONTRACT PREPARATION PROCESS RELEVANT COMPANY AUTHORIZED PERSON	101 YEARS
STOCKTAKING PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 3 YEARS)
COLLECTION FOLLOW-UP PROCESS RELEVANT PERSON (DATA SUBJECT)	10 YEARS
COLLATERAL HEALTH INSURANCE PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 10 YEARS)
SUPPLIER	OTHER (ACTIVITY PERIOD+ 10 YEARS)
SUPPLIER'S EMPLOYEE	OTHER (ACTIVITY PERIOD+ 3 YEARS)
TECHNICAL SUPPORT PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
RELEVANT PERSON (DATA SUBJECT) WHO	OTHER (ACTIVITY PERIOD+ 10

MAKES TECHNICAL SERVICE REQUEST	YEARS)
PROMOTION AND DEPARTMENT CHANGE PROCESS PERSONNEL	101 YEARS
MEETING ROOM SOLUTIONS PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
TRAFFIC CITATION INVOICING PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 10 YEARS)
TERMINAL POINT MANAGEMENT PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
THIRD PARTY CONFIDENTIALITY CONTRACT PROCESS RELEVANT PERSON (DATA SUBJECT)	101 YEARS
POWER OF ATTORNEY PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 1 YEAR)
DATA LOSS PREVENTION PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
VPN PROCESS RELEVANT PERSON (DATA SUBJECT)	2 YEARS
WEB PORTAL REQUEST PROCESS RELEVANT CUSTOMER CANDIDATE	101 YEARS
MEAL CARD DESIGNATION PROCESS RELEVANT PERSONNEL	OTHER (ACTIVITY PERIOD+ 1 DAY)
RELEVANT PERSON (DATA SUBJECT) WHO IS PROVIDED ONSITE TECHNICAL SERVICE	OTHER (ACTIVITY PERIOD+ 10 YEARS)
ANNUAL MEETING ATTENDANTS' RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
VULNERABILITY SCANNING PROCESS RELEVANT PERSON (DATA SUBJECT)	OTHER (ACTIVITY PERIOD+ 2 YEARS)
VISITOR ENTRY – EXIT PROCESS RELEVANT PERSON (DATA SUBJECT)	1 YEAR
RELEVANT PERSON (DATA SUBJECT) WHO MAKES COMPULSORY WORK – INTERNSHIP APPLICATION	OTHER (ACTIVITY PERIOD+ 10 YEARS)