DOKU ESTETİK VE SAĞLIK HİZMETLERİ TİCARET LİMİTED ŞİRKETİ

PDPL PERSONAL DATA RETENTION AND DESTRUCTION POLICY

(Inventory Version: Version 4)

1. INTRODUCTION

1.1 Purpose

This "Personal Data Retention and Destruction Policy" document, hereinafter referred to as the "Policy," is prepared by DOKU AESTHETIC AND HEALTH SERVICES (TRADE LIMITED COMPANY), hereinafter referred to as the "COMPANY," to determine the procedures and principles related to storage and destruction activities carried out by the Company.

Our company has prioritized the processing of personal data belonging to the individuals listed below in accordance with the Constitution, international treaties, the Law No. 6698 on the Protection of Personal Data, and relevant legislation, and ensuring that the related persons can effectively exercise their rights in line with the company's foundation, mission, vision, and core principles.

The storage and destruction of data and related operations are carried out by the Company in accordance with the Policy prepared in this direction.

1.2 Scope

The personal data of the individuals listed below are within the scope of this Policy. This Policy applies to all recording environments where personal data owned by or managed by the Company is processed, and all activities aimed at processing personal data.

- Employee
- Shareholder/Partner
- Board Member
- Potential Product or Service Purchaser
- Supplier Employee
- Supplier Representative
- Person Receiving Product or Service
- Visitor
- Business Partner Employee
- Business Partner Representative
- Intern
- Patient
- Job Candidate

- Visitor (Website)
- Related Person
- Potential Patient
- Job Candidate Reference
- Former Employee/Retiree
- Guarantor
- Representative
- Reference (Patient)
- Certified Public Accountant

1.3 Abbreviations and Definitions

The category of real or legal persons to whom p data is transferred by the data controller.	personal
Informed consent, specific to a particular subject freely and voluntarily.	ct, given
The rendering of personal data so that it can no associated with an identifiable or identifiable na person, even when matched with other data.	<u> </u>
Personnel of the Personal Data Protection Corr	npany.
Environments where personal data can be created read, modified, and written using electronic dev	
All written, printed, visual, etc. other environme outside electronic environments.	nts
:	 Informed consent, specific to a particular subject freely and voluntarily. The rendering of personal data so that it can not associated with an identifiable or identifiable national person, even when matched with other data. Personnel of the Personal Data Protection Comments where personal data can be created, modified, and written using electronic devents. All written, printed, visual, etc. other environments

Service Provider	Real or legal person providing services to the Company within a specific contractual framework.	
Data Subject	The natural person whose personal data is processed.	
Relevant User	Persons who process personal data within the data controller organization or based on the authority and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of the data.	
Destruction	The deletion, destruction, or anonymization of personal data.	
Law	Law No. 6698 on the Protection of Personal Data	
Recording Medium	Any environment where personal data, processed wholly or partially by automated means or by non- automated means provided that they are part of a data recording system, is located.	
Personal Data	Any information relating to an identified or identifiable natural person.	
Personal Data Processing Inventory	An inventory that data controllers create by associating their personal data processing activities, which they carr out based on their business processes, with the personal data processing purposes and legal reasons data categories, recipient groups, and data subject groups, and detailing the maximum retention period required for the purposes for which the personal data is processed, personal data anticipated to be transferred to foreign countries, and the measures taken regarding data security.	
Processing of Personal Data	Any operation performed on personal data, such as obtaining, recording, storing, preserving, altering, reorganizing, disclosing, transferring, taking over, making available, classifying, or blocking its use, whether wholly or partially by automated means or by non-automated means provided that they are part of a data recording system.	
Board	Personal Data Protection Board	
Special Categories of Personal Data	Data related to a person's race, ethnicity, political opinion philosophical belief, religion, sect or other beliefs, attine membership in associations, foundations or trade unions health, sexual life, criminal convictions and securit measures, and biometric and genetic data.	

Periodic Destruction :	The process of deleting, destroying, or anonymizing	
	personal data at recurring intervals as specified in the	
	personal data storage and destruction policy, to be	
	carried out ex officio when all the personal data	
	processing conditions specified in the Law cease to exist.	

Policy	:	Personal Data Storage and Destruction Policy	
Data Processor	:	A real or legal person who processes personal data on behalf of the data controller based on the authority given by the data controller.	
Data Recording	:	The recording system in which personal data is	
System		processed, structured according to specific criteria.	
Data Controller	:	A real or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.	
Data Controllers Registry Information System	:	An information system created and managed by the Presidency, accessible via the internet, which data controllers will use for applications to the Registry and for other relevant processes related to the Registry.	
VERBIS	:	Data Controllers Registry Information System	
Regulation	:	The Regulation on the Deletion, Destruction or Anonymization of Personal Data, published in the Official Gazette dated October 28, 2017.	

2. RESPONSIBILITIES AND TASK DISTRIBUTION

All units and employees of the Company actively support responsible units in ensuring technical and administrative measures are properly implemented within the scope of the Policy, increasing the awareness and training of unit employees, monitoring and continuous auditing to prevent the unlawful processing of personal data, preventing unlawful access to personal data, and ensuring the lawful storage of personal data in all environments where personal data is processed.

The distribution of titles, units, and job descriptions of those involved in the storage and destruction processes of personal data are provided in Table 1.

TITLE	FULL NAME	UNIT	TASK
	Melda AYGIN	No department specified	Managing Committee Tasks

Table 1: Storage and destruction process task distribution

3. RECORDING ENVIRONMENTS

Personal data is securely stored by the Company in compliance with the law in the environments listed below.

- Physical Archive
- E-mail
- Paper
- Digital Archive
- Time & Attendance System
- Enterprise Server
- Accounting Software
- WhatsApp Application
- Call System
- Social Media Accounts
- CRM
- E-mail/Exchange Server
- Patient Protocol Book
- Hard Disk
- Network Video Recorder
- Dropbox
- Card Access System
- Legal Software
- Cloud Environment
- Hospital Information Management System

4. EXPLANATIONS REGARDING STORAGE AND DESTRUCTION

Personal data of the individuals listed below is stored and destroyed by our Company in accordance with the Law:

- Employee
- Shareholder/Partner
- Board Member

- Potential Product or Service Recipient
- Supplier Employee
- Supplier Representative
- Product or Service Recipient
- Visitor
- Business Partner Employee
- Business Partner Representative
- Intern
- Patient
- Job Candidate
- Website Visitor
- Related Person
- Potential Patient
- Job Candidate Reference
- Former Employee/ Retiree
- Guarantor/Surety
- Representative
- Reference (Patient)
- Certified Public Accountant

Detailed explanations regarding storage and destruction are provided below in order.

4.1 Explanations Regarding Storage

The concept of processing personal data is defined in Article 3 of the Law, while Article 4 states that processed personal data must be relevant, limited, and proportionate to the purposes for which they are processed, and must be retained for the duration required by the relevant legislation or necessary for the purposes for which they are processed. Articles 5 and 6 enumerate the conditions for processing personal data.

Accordingly, within the scope of our Company's activities, personal data is stored for the duration required by the relevant legislation or as long as necessary for our processing purposes.

4.1.1 Legal Reasons Requiring Storage

In our Company, personal data processed within the scope of our activities is retained for the duration required by the relevant legislation. In this context, personal data is stored:

- Due to the direct relevance of personal data to the establishment and performance of contracts,
- For the purpose of establishing, exercising, or protecting a right,
- For the mandatory storage of personal data for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the individuals,
- For the purpose of the Company fulfilling any legal obligation,
- In cases where the legislation explicitly stipulates the storage of personal data,
- For storage activities requiring the explicit consent of the data subjects, personal data is stored for the duration provided in the context of obtaining the explicit consent of the data subjects.

4.1.2 Legal Bases Requiring Storage

In our Company, personal data processed within the scope of our activities is retained within the framework of the following legal bases or contracts:

- Law No. 1774 on Identity Reporting
- Law No. 4857 on Labor
- Law No. 5510 on Social Insurance and General Health Insurance
- Law No. 193 on Income Tax
- Law No. 213 on Tax Procedure
- Law No. 3359 on the Basic Principles of Health Services
- Law No. 1219 on the Practice of Medicine and Medical Arts
- Employment Contract
- Law No. 7343 on Enforcement and Bankruptcy
- Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed through Such Publications
- Law No. 4904 on the Turkish Employment Agency
- Law No. 3308 on Vocational Education
- Law No. 6098 on the Turkish Code of Obligations
- Law No. 6331 on Occupational Health and Safety
- Law No. 4632 on Individual Pension Savings and Investment System
- Law No. 5510 on Social Insurance and General Health Insurance
- Law No. 6102 on Turkish Commercial Code

4.1.3 Processing Purposes Requiring Storage

The Company stores personal data processed within the scope of its activities for the following purposes:

- Fulfilling Employment Contract and Legal Obligations for Employees
- Ensuring Compliance with Regulations for Activities
- Providing Information to Authorized Persons, Institutions, and Organizations
- Execution of Management Activities
- Planning and Execution of Operational Activities Necessary for Ensuring Compliance with Company Procedures and/or Relevant Legislation
- Fulfilling Manager Requests in Planning and Execution of Business Activities
- Execution of Risk Management Processes
- Execution of Finance and Accounting Affairs
- Execution of Performance Evaluation Processes
- Execution of Communication Activities
- Ensuring Physical Space Security
- Ensuring Security of Assets and Resources
- Execution and Supervision of Business Activities
- Execution of Personnel Procurement Processes
- Execution of Customer Relationship Management Processes
- Planning and Execution of Service Processes
- Planning and/or Execution of Support Service Activities for Treatment Processes
- Planning and Execution of International Health Tourism Processes
- Planning and Execution of Medical Diagnosis, Treatment, and Care Services
- Execution of Processes for Employee Benefits and Rights
- Planning of Human Resources Processes
- Foreign Personnel Work and Residence Permit Processes
- Monitoring and Execution of Legal Affairs
- Execution of Contract Processes
- Execution of Job Applicant Application Processes
- Execution of Information Security Processes
- Execution of Audit/Ethics Activities
- Planning and Execution of Personnel Termination Processes
- Execution of Assignment Processes
- Organization and Event Management
- Execution of Employee Incentive Activities
- Ensuring Security of Data Controller Operations
- Creation and Monitoring of Visitor Records
- Establishment and Management of Information Technologies Infrastructure
- Execution of Candidate/Intern/Student Selection and Placement Processes
- Execution of Training Activities
- Management of Relations with Business Partners and Suppliers
- Planning and Execution of Diagnosis and Treatment Processes
- Execution of Marketing Analysis Studies
- Monitoring of Patient Operation Process and Treatment Progress
- Tracking Requests/Complaints
- Management/Planning/Monitoring/Execution of Security Processes

- Execution of Emergency Management Processes
- Execution of Occupational Health/Safety Activities
- Planning and Execution of Operational Processes
- Execution of Product/Service Marketing Processes
- Planning and Execution of Post-treatment Support Service Activities
- Planning and Execution of Corporate Sustainability Activities
- Execution of Employee Satisfaction and Commitment Processes
- Execution of Salary Policy
- Execution of Business Continuity Assurance Activities
- Execution of Storage and Archiving Activities
- Joint Processes with Group Companies and Business Partners
- Execution of Access Authorizations
- Execution of Goods/Services Procurement Processes
- Execution of Supply Chain Management Processes

4.2 Reasons Requiring Erasure

In accordance with the Regulation, personal data of data subjects are deleted, destroyed, or anonymized by the Company, either ex officio or upon request, in the following cases:

- The necessity arising from the amendment or repeal of the provisions of the relevant legislation on which the processing or storage of personal data is based,
- The disappearance of the purpose requiring the processing or storage of personal data,
- The removal of the conditions requiring the processing of personal data as specified in Articles 5 and 6 of the Law,
- In cases where the processing of personal data is solely based on explicit consent, the withdrawal of consent by the relevant person,
- The acceptance by the data controller of the application made by the relevant person regarding the deletion, destruction, or anonymization of personal data within the framework of the rights specified in Article 11 of the Law,
- In cases where the data controller rejects the application made by the relevant person for the deletion, destruction, or anonymization of personal data, finds the response given to be insufficient, or does not respond within the time period stipulated in the Law; the approval of the request by the Board after filing a complaint,
- The absence of any condition justifying the storage of personal data for a longer period, despite the maximum storage period required for personal data having expired.

5. TECHNICAL AND ADMINISTRATIVE MEASURES

Technical and administrative measures are taken by the Company within the framework of sufficient precautions determined and announced by the Company Management or the Personal Data Protection Committee (PDPC) in accordance with Article 12 of the Law and the fourth paragraph of Article 6 of the Law for the secure storage of personal data, preventing unlawful processing and access, and the lawful destruction of personal data, including special categories of personal data.

5.1 Technical Measures

The technical measures taken by the Company regarding the processed personal data are listed below:

- Network security and application security are provided.
- A closed system network is used for personal data transfers over the network.
- Security measures are taken within the scope of supply, development, and maintenance of information technology systems.
- An authorization matrix is created for employees.
- Access logs are regularly maintained.
- Data masking measures are applied when necessary.
- The authorizations in this field of employees who change positions or leave the job are removed.
- Up-to-date anti-virus systems are used.
- Firewalls are utilized.
- Personal data security issues are promptly reported.
- Personal data security is monitored.
- Security of environments containing personal data is ensured.
- Personal data is backed up, and the security of backed-up personal data is also ensured.
- User account management and authorization control systems are implemented and monitored.
- Log records are kept in a way that user intervention is not possible.
- Existing risks and threats have been identified.
- Attack detection and prevention systems are used.
- Penetration tests are conducted.
- Encryption is implemented.
- Data loss prevention software is used.

5.2 Administrative Measures

The administrative measures taken by the Company regarding the processed personal data are listed below:

- There are disciplinary regulations containing data security provisions for employees.
- Training and awareness activities on data security are conducted for employees at regular intervals.
- Corporate policies on access, information security, usage, storage, and destruction have been prepared and implemented.
- Confidentiality agreements are made.
- Signed contracts include data security provisions.
- Personal data security policies and procedures have been established.
- Necessary security measures are taken regarding the entry and exit of physical environments containing personal data.
- The security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.
- Personal data is minimized as much as possible.
- Periodic and/or random internal audits are conducted and enforced.
- Protocols and procedures for the security of special categories of personal data have been established and are being implemented.
- Data processor service providers are made aware of data security issues.
- Data processor service providers are audited at regular intervals on data security issues.

6. PERSONAL DATA DESTRUCTION TECHNIQUES

At the end of the retention period stipulated by the relevant legislation or the period necessary for the purpose for which they were processed, personal data is destroyed by the Company, either ex officio or upon the application of the data subject, in accordance with the relevant legislation provisions using the techniques listed below.

6.1 Personal Data Deletion

Personal data is deleted using the methods listed in Table-2.

Data Recording Medium	Description		
Personal Data on Servers	For personal data stored on servers whose retention period has ended, the system administrator removes access rights of the relevant users and performs the deletion process.		
Personal Data in Electronic Environment	For personal data stored in electronic environments whose retention period has ended, the data is made inaccessible and unusable for other employees (relevant users) except for the database administrator.		

Personal Data in Physical Environment	For personal data stored in physical environments whose retention period has ended, the data is made inaccessible and unusable for other employees except for the unit manager responsible for document archiving. Additionally, a blacking-out process is applied by crossing out, coloring, or erasing the data so it becomes unreadable.	
Personal Data on Portable Media		

Table 2: Personal Data Deletion

6.2 Destruction of Personal Data

Personal data is destroyed by the Company using the methods listed in Table-4.

Data Recording Medium	Description
Personal Data in Physical Environment	For personal data on paper whose retention period has ended, the data is destroyed using paper shredders so that it cannot be recovered.
Personal Data on Optical / Magnetic Media	For personal data on optical and magnetic media whose retention period has ended, physical destruction processes such as melting, burning, or pulverizing are applied. Additionally, for magnetic media, the data is rendered unreadable by exposing it to a high magnetic field using a special device.

Table 3: Destruction of Personal Data

Anonymization of Personal Data

Anonymization of personal data refers to making the data unable to be associated with an identifiable or identifiable real person, even when matched with other data. For personal data to be considered anonymized, the data must be made unrelatable to an identifiable or identifiable real person, even if appropriate techniques such as reversal or data matching by the data controller or third parties are used, considering the recording medium and related activity field.

7. RETENTION AND DESTRUCTION PERIODS

For personal data processed within the scope of the Company's activities:

- The retention periods for all personal data related to the activities carried out within the processes are listed in the Personal Data Processing Inventory on a personal data basis;
- Retention periods for data categories are recorded in VERBIS;
 Retention periods for processes are included in the Personal Data

Retention and Destruction Policy.

Updates on the mentioned retention periods and automatic deletion, destruction, or anonymization of personal data whose retention periods have ended are carried out by the Company's Board of Directors or the KVKK Committee.

DEPARTMENT / PROCESS	DATA CATEGORY	RETENTION PERIOD	DESTRUCTION PERIOD
Quality Management and Legal Notifications / Legal Notifications Regarding Health Personnel Starting/Leaving Employment	Personnel Files	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notifications / Legal Notifications Regarding Health Personnel Starting/Leaving Employment	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / General Assembly / Procurement of Documents Related to Company Officials	Communication	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / General Assembly / Procurement of Documents Related to Company Officials	Visual and Audio Records	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / General Assembly / Procurement of Documents Related to Company Officials	Identity	5 Years	In the first destruction period following the end of the retention period

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Accounting and Financial Affairs / Fulfillment of Manager Requests	Professional Experience	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Health Information	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Biyometrik Veri	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Visual and Auditory Records	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Finance	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Notification of Employee Entries/Exits to Police Force	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Performance and Bonus Calculation	Personnel Files	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Performance and Bonus Calculation	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Income Tax and Withholding Tax Declaration Procedures	Personnel Files	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Income Tax and Withholding Tax Declaration Procedures	Communication	5 Years	In the first destruction period following the end of the retention period
Administrative Affairs / Cafeteria Access Control / Time and Attendance System	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Income Tax and Withholding Tax Declaration Procedures	Identity	5 Years	In the first destruction period following the end of the retention period

Accounting and Financial Affairs / Visa Procedures	Communication	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Visa Procedures	Personnel Files	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Visa Procedures	Finance	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Visa Procedures	Identity	5 Years	In the first destruction period following the end of the retention period
Call Center / Informing Patients about Treatment Processes	Communication	3 Years	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Taking Pre- and Post-Treatment Photographs	Health Information	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Finance	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Professional Experience	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Health Information	15 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Criminal Convictions and Security Measures	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Communication	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workplace Accident Notification	Health Information	15 years from the termination of the employment relationship	In the first destruction period following the end of the retention period

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Human Resources / Workplace Accident Notification	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Personnel Management / Obtaining Work Permits for Foreign Nationals	Professional Experience	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Personnel Management / Obtaining Work Permits for Foreign Nationals	Visual and Auditory Records	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Personnel Management / Obtaining Work Permits for Foreign Nationals	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Preparation of Payroll	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Employee Salary Procedures	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Visual and Auditory Records	2 Years	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Health Information	2 Years	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Criminal Convictions and Security Measures	2 Years	In the first destruction period following the end of the retention period
Information Technologies / Cookie Management Process	Transaction security	Deleted at the end of the activity	In the first destruction period following the end of the retention period
Human Resources / Enforcement Monitoring	Identity	10 Years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Employee Termination Procedures	Personnel Files	10 Years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / New Employee Announcement	Professional Experience	10 Years from the termination of the employment relationship	In the first destruction period following the end of the retention period

Human Resources / Recruitment / New Employee Announcement	Communication	10 Years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Employee Salary Procedures	Finance	10 Years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Communication	2 Years	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Identity	2 Years	In the first destruction period following the end of the retention period
Human Resources / Notification of New Hires and Terminations to Departments	Identity	Deleted at the end of the activity	In the first destruction period following the end of the retention period
Human Resources / Notification of New Hires and Terminations to Departments	Professional Experience	Deleted at the end of the activity	In the first destruction period following the end of the retention period
Human Resources / Incentive Procedures	Professional Experience	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Administrative Affairs / Clinic Entrance Control / PDKS	Identity	6 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Incentive Procedures	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Incentive Procedures	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Information Technology / Visitor Network Procedures	Transaction security	2 Years	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Protocol Book	Health Information	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Job Offer	Professional Experience	1 Year	In the first destruction period following the end of the retention period

Human Resources / Recruitment / Conducting Personnel Entry Procedures	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workplace Accident Notification	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workforce Schedule and Disability Notification	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Intern Performance Evaluation	Professional Experience	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Human Resources / Personnel Management / Determining Job Descriptions	Professional Experience	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Preliminary Accounting Transactions / Invoice Entries	Communication	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Preliminary Accounting Transactions / Invoice Entries	Finance	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Preliminary Accounting Transactions / Invoice Entries	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Genetik Veri	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Criminal Convictions and Security Measures	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Foundation Membership	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Trade Union Membership	5 Years	In the first destruction period following the end of the retention period

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Accounting and Financial Affairs / Fulfillment of Manager Requests	Association Membership	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Power of Attorney Procedures	Visual and Auditory Records	5 Years	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Treatment Planning and Obtaining Approval	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Protocol Book	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Digital Marketing / Planning and Execution of International Health Services	Visual and Auditory Records	10 Years	Silinme talebi ile, Silinme talebi sonrası 30 gün cevap süresi içerisinde, In the first destruction period following the end of the retention period
Software / Design of Personnel Cards	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period
Software / Design of Personnel Cards	Visual and Auditory Records	Until the employee leaves the job	In the first destruction period following the end of the retention period
Software / Cookie Management Process	Marketing	2 Years	In the first destruction period following the end of the retention period
Digital Marketing / Planning and Execution of International Health Services	Professional Experience	10 Years	Silinme talebi ile, Silinme talebi sonrası 30 gün cevap süresi içerisinde, In the first destruction period following the end of the retention period
Digital Marketing / Planning and Execution of International Health Services	Identity	10 Years	Silinme talebi ile, Silinme talebi sonrası 30 gün cevap süresi içerisinde, In the first destruction period following the end of the retention period
Digital Marketing / Planning and Execution of International Health Services	Health Information	10 Years	Silinme talebi ile, Silinme talebi sonrası 30 gün cevap süresi içerisinde, In the first destruction period following the end of the retention period
Software / Operation Procedures and Monitoring Process	Health Information	20 Years	In the first destruction period following the end of the retention period

Security / Lost and Found Property Records	Identity	1 Year	In the first destruction period following the end of the retention period
Security / Entrance-Exit Record and Control Procedures	Physical space security	З Ау	Saklama süresi bitimi ile, In the first destruction period following the end of the retention period
Information Technology / Personnel Card Registration and Printing Process	Identity	6 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Information Technology / System Room Access Control	Transaction security	2 Years	In the first destruction period following the end of the retention period
Occupational Health and Safety / OHS Trainings	Identity	15 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Health Tourism / Interpretation Services	Communication	20 Years	In the first destruction period following the end of the retention period
Health Tourism / Interpretation Services	Identity	20 Years	In the first destruction period following the end of the retention period
Health Tourism / Outsourced Processes / Post-Treatment Follow- Up	Health Information	20 Years	In the first destruction period following the end of the retention period
Information Technology / System Room Access Control	Identity	2 Years	In the first destruction period following the end of the retention period
Information Technologies / Employee Phone (Internal/GSM) List	Communication	Until the employee leaves the job	In the first destruction period following the end of the retention period
Information Technologies / Employee Phone (Internal/GSM) List	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Information Technologies / Technical Service Procurement	Communication	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Call Center / Informing Patients about Treatment Processes	Health Information	3 Years	In the first destruction period following the end of the retention period
Security / Security Breach	Identity	10 Years	In the first destruction period following the end of the retention period

Health Tourism / Outsourced Processes / Patient Data Transfer	Identity	20 Years	In the first destruction period following the end of the retention period
Human Resources / Workforce Schedule and Disability Notification	Health Information	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Personnel Management / Obtaining Work Permits for Foreign Nationals	Communication	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Enforcement Monitoring	Finance	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Enforcement Monitoring	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Execution of Training Activities	Visual and Auditory Records	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Performance-Employee Satisfaction Management	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Individual Retirement Procedures	Communication	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workforce Schedule and Disability Notification	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Personnel Management / Determining Job Descriptions	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Execution of Training Activities	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Employee Termination Procedures	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Leave Management	Communication	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period

Human Resources / Leave Management	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Leave Management	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Screening and Reference Checks	Identity	1 Year	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Screening and Reference Checks	Professional Experience	1 Year	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Job Offer	Identity	1 Year	In the first destruction period following the end of the retention period
Human Resources / Preparation of Payroll	Health Information	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Call Center / Informing Patients about Treatment Processes	Identity	3 Years	In the first destruction period following the end of the retention period
Digital Marketing / Archiving of Pre- and Post-Treatment Photos	Visual and Auditory Records	20 years after the legal relationship has ended	Upon expiration of the retention period, during the first destruction period, with a deletion request
Digital Marketing / CRM Registration of Patients from Agencies	Health Information	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Digital Marketing / CRM Registration of Patients from Agencies	Communication	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Information Technology / Personnel Card Registration and Printing Process	Visual and Auditory Records	6 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Information Technology / Personnel Card Registration and Printing Process	Professional Experience	6 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Risk management	20 Years	In the first destruction period following the end of the retention period

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Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Personnel Files	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Professional Experience	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Transaction security	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Communication	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Legal transaction	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Visual and Auditory Records	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Foundation Membership	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Trade Union Membership	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Association Membership	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Criminal Convictions and Security Measures	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement-	Identity	20 Years	In the first destruction period following the end of the retention period

Mediation- Reconciliation)			
Law / Consultation and Opinion Sharing on Various Matters	Finance	20 Years	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Professional Experience	2 Years	In the first destruction period following the end of the retention period
Law / Legal Opinion for Contract Process	Customer transaction	20 Years	In the first destruction period following the end of the retention period
Law / Legal Opinion for Contract Process	Personnel Files	20 Years	In the first destruction period following the end of the retention period
Law / Legal Opinion for Contract Process	Finance	20 Years	In the first destruction period following the end of the retention period
Law / Legal Opinion for Contract Process	Identity	20 Years	In the first destruction period following the end of the retention period
Law / Legal Opinion for Contract Process	Communication	20 Years	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Quality Certification	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Billing	Customer transaction	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Billing	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Quality Trainings	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Quality Trainings	Visual and Auditory Records	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Quality Trainings	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Quality Certification	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period

Occupational Health and Safety / Return-to- Work Evaluation After Work Accident	Identity	15 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Personnel Card Definition	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workplace Accident Notification	Family Members and Close Information	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workplace Accident Notification	Communication	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Family Members and Close Information	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Employee Termination Procedures	Finance	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Individual Retirement Procedures	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Family Members and Close Information	20 Years	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Treatment Planning and Obtaining Approval	Customer transaction	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Treatment Planning and Obtaining Approval	Professional Experience	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Treatment Planning and Obtaining Approval	Communication	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Treatment Planning and Obtaining Approval	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period

Medical Diagnosis, Treatment, and Care Services / Treatment Planning and Obtaining Approval	Health Information	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Information Technologies / Ensuring Physical Space Security	Physical space security	3 Months	Upon expiration of the retention period, during the first destruction period, with a deletion request
Law / Legal Opinion for Contract Process	Legal transaction	20 Years	In the first destruction period following the end of the retention period
Law / Consultation and Opinion Sharing on Various Matters	Health Information	20 Years	In the first destruction period following the end of the retention period
Occupational Health and Safety / Pre- Employment / Periodic Medical Examination	Identity	15 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Security / Creation and Monitoring of Visitor Records	Identity	1 Year	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Taking Pre- and Post-Treatment Photographs	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Treatment Pricing Procedure	Finance	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Information Technologies / Technical Service Procurement	Identity	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Information Technologies / Request Tracking	Identity	2 Years	In the first destruction period following the end of the retention period
Information Technologies / Keeping Fixed Asset Records	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period
Information Technologies / Keeping Fixed Asset Records	Transaction security	Until the employee leaves the job	In the first destruction period following the end of the retention period
Information Technologies / Keeping Fixed Asset Records	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period

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Information Technologies / Authorization Procedures	Communication	Until the employee leaves the job	In the first destruction period following the end of the retention period
Information Technologies / Authorization Procedures	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Post- Treatment Procedures	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Pre- Operation Blood Tests	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Power of Attorney Procedures	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Month-End Closing Procedure / CPA Controls	Communication	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Month-End Closing Procedure / CPA Controls	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Employee Work Status Confirmation	Personnel Files	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Employee Work Status Confirmation	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Notification of Employee Entries/Exits to Police Force	Risk management	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Notification of Employee Entries/Exits to Police Force	Professional Experience	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Notification of Employee Entries/Exits to Police Force	Personnel Files	5 Years	In the first destruction period following the end of the retention period

Human Resources / Performance-Employee Satisfaction Management	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Preparation of Payroll	Personnel Files	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Individual Retirement Procedures	Finance	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Individual Retirement Procedures	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / New Employee Announcement	Identity	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Job Offer	Personnel Files	1 Year	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Interview Process	Professional Experience	2 Years	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Interview Process	Identity	2 Years	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Collection of Applications	Personnel Files	2 Years	In the first destruction period following the end of the retention period
Law / Consultation and Opinion Sharing on Various Matters	Communication	20 Years	In the first destruction period following the end of the retention period
Law / Consultation and Opinion Sharing on Various Matters	Identity	20 Years	In the first destruction period following the end of the retention period
Law / Consultation and Opinion Sharing on Various Matters	Personnel Files	20 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Personnel Files	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Fulfillment of Manager Requests	Communication	5 Years	In the first destruction period following the end of the retention period

Accounting and			In the first destruct and the
Financial Affairs / Fulfillment of Manager Requests	Identity	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Power of Attorney Procedures	Communication	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Power of Attorney Procedures	Finance	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Notification of Employee Entries/Exits to Police Force	Communication	5 Years	In the first destruction period following the end of the retention period
Law / Consultation and Opinion Sharing on Various Matters	Legal transaction	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Customer transaction	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Health Information	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Physical space security	20 Years	In the first destruction period following the end of the retention period
Law / Legal Affairs Monitoring (Enforcement- Mediation- Reconciliation)	Finance	20 Years	In the first destruction period following the end of the retention period
Information Technologies / Authorization Procedures	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Occupational Health and Safety / OHS Trainings	Visual and Auditory Records	15 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Digital Marketing / CRM Registration of Patients from Agencies	Identity	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request

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Medical Diagnosis, Treatment, and Care Services / Treatment Pricing Procedure	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Registration and Admission	Customer transaction	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Registration and Admission	Professional Experience	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Registration and Admission	Communication	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Registration and Admission	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Registration and Admission	Health Information	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Patient Registration and Admission	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Creating Patient Appointments	Communication	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Medical Diagnosis, Treatment, and Care Services / Creating Patient Appointments	Identity	20 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Software / Design of Personnel Cards	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Software / CRM Record of Patient Information	Health Information	20 Years	In the first destruction period following the end of the retention period
Software / CRM Record of Patient Information	Identity	20 Years	In the first destruction period following the end of the retention period

Software / Web Management and Sales / Lead, Sales	Visual and Auditory Records	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Software / Web Management and Sales / Lead, Sales	Health Information	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Software / Web Management and Sales / Lead, Sales	Communication	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Software / Web Management and Sales / Lead, Sales	Identity	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Quality Management and Legal Notification / Creation of Organization Chart	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / EKIP Health Information System Data Entry	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / EKIP Health Information System Data Entry	Identity	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Legal Notifications for Newly Employed / Departing Healthcare Workers	Criminal Convictions and Security Measures	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Legal Notifications for Newly Employed / Departing Healthcare Workers	Visual and Auditory Records	Until the employee leaves the job	In the first destruction period following the end of the retention period
Procurement / Goods / Execution of Service Procurement Processes	Professional Experience	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Procurement / Goods / Execution of Service Procurement Processes	Communication	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Procurement / Goods / Execution of Service Procurement Processes	Identity	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period

Technical Service / Maintenance and Repair	Professional Experience	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Technical Service / Maintenance and Repair	Identity	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Legal Notifications for Newly Employed / Departing Healthcare Workers	Communication	Until the employee leaves the job	In the first destruction period following the end of the retention period
Quality Management and Legal Notification / Legal Notifications for Newly Employed / Departing Healthcare Workers	Professional Experience	Until the employee leaves the job	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Creation and Tracking of Current Account Records	Communication	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Creation and Tracking of Current Account Records	Finance	5 Years	In the first destruction period following the end of the retention period
Accounting and Financial Affairs / Creation and Tracking of Current Account Records	Identity	5 Years	In the first destruction period following the end of the retention period
Human Resources / Intern Performance Evaluation	Communication	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Human Resources / Intern Performance Evaluation	Identity	10 years after the legal relationship has ended	In the first destruction period following the end of the retention period
Human Resources / Personnel Card Definition	Professional Experience	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Workplace Accident Notification	Professional Experience	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period
Human Resources / Recruitment / Conducting Personnel Entry Procedures	Visual and Auditory Records	10 years from the termination of the employment relationship	In the first destruction period following the end of the retention period

Digital Marketing / Website Communication	Communication	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request
Digital Marketing / Website Communication	Identity	20 Years	Upon expiration of the retention period, during the first destruction period, with a deletion request

Table 4: Retention and destruction periods table based on processes

8. PERIODIC DESTRUCTION PERIOD

In accordance with Article 11 of the Regulation, the Company has set the periodic destruction period as 6 months. Accordingly, the periodic destruction process is carried out in the following months each year within the Company:

- February
- August