

Personal Data Storage & Disposal Policy

1. Purpose

1.1. The purpose of the Personal Data Storage and Disposal Policy is to determine the procedures and principles of conducting the storage and disposal activities by INA Prime Solutions.

1.2. To process the personal data of employees of INA, our clients, and other third parties in accordance with personal data protection laws and other relevant legislation. To provide effective use of the relevant persons' rights. The work and transactions regarding the storage and disposal of personal data are carried out in accordance with the policy prepared by INA.

2. Scope

2.1. This Policy is prepared for the people whose personal data are processed by INA Prime Solutions including company employees, company customers, potential customers, company business partners, candidate employees, visitors and third parties, either automatically or by non-automatic means provided that they are part of any data recording system and applied within the scope of these determined people.

2.2 INA Prime Solutions shall inform the afore-mentioned Personal Data Subjects about the law by means of publishing this policy on the web-site.

3. Definitions

Explicit consent: Freely given and informed consent on a specified issue.

Anonymization: rendering personal data impossible to link with an identified or identifiable natural person, even though matching them with other data.

Medium: any type of environment that the personal data processed to be created, read, changed and written wholly or partially by automated means.

Non-electronic Medium: The other environments such as written, published, visual etc. except the electronic ones.

Service Providers: The real and legal person who provides service to INA in the frame of a certain agreement.

Data subject: the natural person whose personal data are processed.

Disposal: erasure, destruction or anonymization of personal data.

Personal data processing inventory: the inventory which are detailed by explanations of the followings: personal data processing activities of data controllers according to their business processes; purposes and legal ground of personal data processing; data category; maximum data storage period required for the purposes formed relating to the recipient group to whom the data are transferred and with data subject groups, and for personal data processing; personal data envisaged to be transferred to foreign countries; and measures taken relating to the data security.

Processing of personal data: any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.

Periodic Disposal: the erasure, destruction or anonymization process which is determined in the personal data storage and disposal policy and to be carried out periodically, in the event that all of the conditions for processing laid down in the law no longer exist.

Data Processor: the natural or legal person who processes personal data on behalf of the data controller upon its authorization.

Data filing system: the system where personal data are processed by being structured according to specific criteria.

Data Controller: the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system.

4. Recording Media

4.1. Personal data are securely stored by INA Prime Solutions in the media listed in the following table.

ELECTRONIC MEDIA	NON-ELECTRONIC MEDIA
Servers (Domain, backup, e-mail, database, web, file sharing, etc.) Software (office software, portal), Information security devices (firewall, attack detection and blocking, log file, antivirus etc.) Personal computers (Desktop, laptop) Mobile devices (phone, tablet, etc.) Optical discs (CD, DVD, etc.) Removable memory (USB, Memory Card, etc.) Printer, scanner, photocopy machine, Managed within the scope of company social media and business	Paper, Manual data recording systems (survey forms, visitor entry book) Written, published, visual media

network accounts (such as LinkedIn, Instagram)	
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5. Explanations in the Storage and Disposal

5.1. Personal data belonging to employees, candidates for employees, visitors and employees of third parties, companies or organizations with whom we deal as service providers are stored and destroyed in accordance with the law.

5.2. Personal data held by our company;

- To comply with the law and good faith
- Being accurate and updated when necessary
- Processing for specific, explicit, and legitimate purposes
- Being connected, limited, and measured with the purpose of processing
- Operates in accordance with the principles stipulated in the relevant legislation or keeping for the period required for the purpose for which they are processed.

6. The Personal Data Subject's Right and Usage of these Rights

6.1. The Rights of Personal Data Subjects

6.1.1. Personal data subjects have the following rights:

- Learning whether personal data is processed.
- If processed, requesting information on the personal data processing.
- Learning the purpose of the personal data processing and whether they are used in accordance with that purpose.
- Learning which third parties the personal data was transferred to in country and abroad.
- Requesting correction of personal data in case of incomplete or incorrect processing, and requesting notification of the transaction made within this scope to third parties to whom personal data are transferred.
- Request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, nevertheless the fact that it has been processed in accordance with the law, and requesting the notification of the transaction made within this scope to third parties to whom the personal data has been transferred,
- Making objection to the occurrence of a result against the person by analyzing the processed data exclusively through automated systems.
- Requesting the compensation of the damage due to the processing of personal data illegally.

6.2. Circumstances that Personal Data Subjects Cannot Claim Their Rights

6.2.1. Personal data subjects cannot claim the rights of personal data subjects for the following situations:

- Processing of personal data is necessary for a criminal investigation.
- The processing of personal data made public by the personal data subject.

6.3. Usage of the Rights by the Personal Data Subjects

6.3.1. The personal data subjects can send the requests on their rights to INA free of charge by means of the methods listed below:

(1) Filling out the form on the web address, (To be advised) and signing it with a wet signature and then sending it to *“INA Prime Solutions, 3284 Yonge St, Suite 500, Toronto, ON M4N 3M7”*.

(2) Filling out the form on the web address, (To be advised) and signing it with a wet signature and then sending it to *“INA Prime Solutions, 3284 Yonge St, Suite 500, Toronto, ON M4N 3M7”* via a notary.

(3) Sending electronic mail to the e-mail address, *info@inaprime.com* which belongs to INA Prime Solutions.

6.3.2. It is not possible to make requests by third parties on behalf of personal data subjects. In order for a person other than the personal data subject to make a request, the original copy of power of attorney issued by the personal data subject on behalf of the person to make the application shall be submitted.

6.4. INA Prime Solutions' Procedure and Duration to Respond to Applications

6.4.1. If the personal data owner submits the request of this section to INA in accordance with the above-mentioned procedure, INA will finalize the request as soon as possible and within thirty days at the latest, depending on the nature of the request.

6.5. Information INA Prime Solutions May Request from Personal Data Subject Applying

6.5.1. INA Prime Solutions may request information from the person concerned in order to determine whether the applicant is the subject of personal data. In order to clarify the matters in the application of the personal data subject, INA may ask a question to the personal data subject about his application.

6.6. INA Prime Solutions' Right to Reject the Application of Personal Data Owner

6.6.1. INA Prime Solutions may reject the application of the applicant by explaining the reason in the following situations:

- (1) Processing of personal data by judicial authorities in relation to an investigation, prosecution, or trial.
- (2) Processing of personal data is necessary for a criminal investigation.
- (3) Processing personal data made public by the personal data owner himself.
- (4) The information requested is public information.

7. Within the scope of this document, INA Prime Solutions manages the Personal data policy by adopting the following fundamental principles.

- Processing the personal data appropriate to the law and good faith
- Keeping personal data accurate and updated when necessary
- Processing the personal data for specific, clear, legitimate purposes
- Processing personal data linked to the purpose for which they are processed, in limited, and measuredly
- Keeping personal data for the period stipulated in the relevant legislation or for the purpose for which they are processed
- Enlightening and informing personal data owners
- Setting up the necessary system for personal data owners to exercise their rights
- Taking required measures in the preservation of personal data
- To act in accordance with the relevant legislation in transferring personal data to third parties in line with the requirements of the processing purpose
- To give the necessary importance to process and protect the special categories of personal data

8. Transfer of the Personal data and its Purpose

The Persons Personal Data May Be Transferred To	Purpose of Data Transfer
Business Partners	To take products and services, the projects and cooperation with company itself or with the Group Companies during INA's commercial activities

Company Authorities	In accordance with the provisions of the relevant legislation, it can be transferred in a limited manner for designing strategies for the commercial activities of INA, ensuring the highest level of management and auditing purposes.
Legally Authorized Private Law Persons	In accordance with the provisions of the legislation, the relevant private law persons can be transferred within their legal authority with a limited purpose.

9. Data Categories

9.1 Personal Data Subject

Personal Data Subject Category	Explanation
Customer	Real persons who used or have used the products and services offered by INA, regardless of whether they have any contractual relationship with INA.
Potential Customer	Real persons who have requested or made an interest in using INA's products and services or who have been evaluated in accordance with the rules of commercial practice and honesty.
Visitor	Real persons who, for various purposes, visited the physical premises of INA, or visited INA's websites.
Third Parties	Third-party natural persons who are associated with INA Prime Solutions in order to ensure the security of commercial transactions between the aforementioned parties or to protect the rights of the aforementioned persons and to obtain benefits.
Candidate Employee	Real persons who have applied for a job at INA in any way or who have opened their cv and related information to INA for inspection.

Company Authorities	Board member of INA and other real persons authorized by our company
Employees	Real persons working in organizations with which INA Prime Solutions has all kinds of business relations (such as business partners, suppliers, but not limited to them)

9.2. Personal Data Categorization

PERSONAL DATA CATEGORIZATION	EXPLANATION
Identity Info	The documents such as Driving License, Id Card and Passport, with name-surname, Id number, nationality, parents names, birth place, birth date, gender info, and Social Security Institution no, signature info, vehicle plate, etc.
Communication Info	Info that clearly belongs to an identified or identifiable natural person; processed partially or fully automatically or non-automatically as part of the data recording system; such as phone number, address, e-mail address, fax number, IP address.
Location Info	Info determining the location of the employees of the companies while using the Company vehicles; GPS location, travel data, etc.
Visual/Audial Data	Info that clearly belongs to an identified or identifiable natural person; data contained in documents that are copies of photographs and camera recordings, sound recordings and documents containing personal data.
Customer Info	Info obtained and produced about the person concerned as a result of our commercial activities and operations carried out by our business units within this

	framework
Family Members and Relatives Info	Information about the products and services we offer or the family members and relatives of the personal data owner in order to protect the legal interests of INA and the data subject.
Customer Operation Info	Information such as records for the use of our products and services, and instructions and requests required by the customer for the use of products and services
Physical Space Security Info	Personal data regarding the records and documents taken during the entrance to the physical space, during the stay in the physical space
Process Security Info	Your personal data processed in order to ensure technical, administrative, legal and commercial security while conducting business activities
Risk Management Info	Personal data processed by means of methods used in accordance with the generally accepted legal, commercial practice and good faith in these fields so that we can manage our technical and administrative risks.
Financial Info	Processed personal data regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship our company has established with the personal data owner.
Employee Info	All kinds of personal data processed to obtain information that will be the basis of the personal rights of our employees or real persons who have a working relationship with INA.
Candidate Employee Info	Personal data processed about individuals who have applied to be an employee of our company or who have been evaluated as employee

	candidates in line with the human resources needs of our company or who have a working relationship with INA in accordance with commercial practices and honesty rules.
Legal Transaction and Accordance Info	Your personal data processed within the scope of determination, follow-up of our legal receivables and rights and the performance of our debts and compliance with our legal obligations and our company's policies
Audit and Inspection Info	Your personal data processed within the scope of our company's legal obligations and compliance with company policies
Marketing Info	Personal data processed for the marketing of our products and services in line with the usage habits, taste and needs of the personal data owner and the reports and evaluations created as a result of this processing
Request/Complaint Management Info	Personal data regarding the receipt and evaluation of any request or complaint directed to our company
Event Management Info	Information and evaluations collected about events that have the potential to affect our company and its employees

10. Legal Reasons and Legislative purposes that require storage

10.1 The information held by INA Prime Solutions is kept in accordance with the provisions of the relevant legislation and processes personal data limited to the purposes and conditions within the personal data processing conditions. These purposes and conditions are:

- It is explicitly stipulated by law that INA will carry out relevant activities regarding the processing of personal data.

- The processing of personal data by INA is directly related and necessary with the establishment or performance of a contract.
- Processing of personal data is mandatory for INA to fulfill its legal obligation.
- Provided that your personal data are made public by you; processing by INA in a limited way for your publicization purpose.
- The processing of personal data by INA is mandatory for the establishment, use or protection of INA, or your or third parties' rights.
- It is mandatory to perform personal data processing for the legitimate interests of INA, provided that it does not harm your fundamental rights and freedoms.
- It is compulsory for INA to process personal data for the protection of the life or physical integrity of the personal data owner or another person, and in this case, the personal data owner is unable to disclose his consent due to the actual impossibility or legal invalidity.
- In the absence of the above conditions, in order to carry out personal data processing activities, INA applies to the explicit consent of the personal data owners.

10.2. According to our company policy, the following situations are considered as legitimate processing purposes in terms of current activities and data that may be processed in the future.

- Establishing and managing information technology infrastructure
- Making the best use of the products and services of Personal Data Subjects and recommending them according to their requests, needs and requests
- Ensuring the highest level of data security
- Creating databases,
- Improving the services offered on the website and eliminating the errors on the website, supporting the Group Companies' personnel recruitment processes and compliance with the relevant legislation
- Planning, auditing and execution of information security processes
- Planning and execution of emergency management processes
- Planning and implementation of human resources policies in the best way
- Correct planning, execution and management of commercial partnerships and strategies
- Ensuring the legal, commercial and physical security of itself and its business partners
- Communicating with Personal Data Subjects who convey their requests and complaints to them and to provide request and complaint management,
- Event management
- Management of relations with business partners or suppliers
- Execution of personnel procurement processes
- Planning and execution of employee satisfaction and / or loyalty processes
- Planning and execution of fringe benefits and interests for employees
- Planning and execution of employees' access to information rights
- Following and / or controlling of employees' business activities
- Following financial and / or accounting issues
- Following legal affairs
- Planning human resources processes

- Planning and execution of business activities
- Planning and execution of business partners and / or suppliers' access rights to Information
- Management of relations with business partners and / or suppliers
- Planning and execution of corporate communication activities
- Planning and / or execution of corporate risk management activities
- Planning and execution of corporate sustainability activities
- Planning and execution of corporate governance activities
- Planning and execution of customer relationship management processes
- Planning and / or following customer satisfaction processes
- Following customer requests and / or complaints
- Execution of personnel procurement processes
- After sales support services
- Fulfillment of obligations arising from employment contracts and / or legislation for company employees
- Ensuring the security of company fixtures and / or resources
- Planning and execution of company audit activities
- Planning and execution of external training activities
- Planning and execution of the operational activities required to ensure that the company activities are carried out in accordance with company procedures and / or relevant legislation.
- Planning and execution of internal appointment-promotion and dismissal processes
- Ensuring the security of INA's offices
- Planning and / or execution of INA's financial risk processes
- Planning and / or execution of INA's production and / or operational risk processes
- Conducting company and partnership law transactions
- Following contract processes and / or legal requests
- Execution of strategic planning activities
- Planning and execution of supply chain management processes
- Planning and execution of human resources needs required for production
- Planning and execution of production and / or operation processes
- Planning and execution of market research activities for the sales and marketing of products and services
- Planning and execution of marketing processes of products and / or services
- Planning and execution of the sales processes of products and / or services
- Planning and execution of promotion and / or marketing processes of products and / or services
- Ensuring that the data are accurate and updated
- Planning and executing talent - career development activities
- Giving information to authorized persons and / or organizations based on legislation
- Creating and tracking visitor records

11. Reasons Requiring Disposal

Reasons Requiring Disposal

- Amendment or abolition of the relevant legislation provisions that constitute the basis for processing personal data.
- The abolition of the purpose requiring processing or storage
- In cases where the processing of personal data takes place only on the condition of express consent, the persons concerned withdraws their express consent
- In accordance with the law, the application made by INA Prime Solutions for the deletion and destruction of personal data within the framework of the rights of the person concerned,
- In cases where the maximum period that requires the storage of personal data has passed and there are no conditions to justify the storage of personal data for a longer period, they are deleted, destroyed or anonymized by INA at the request of the person concerned.

12. Technical and Administrative Measures

12.1 For safe storage of personal data, the technical and administrative measures to prevent unlawful processing and access, and for the disposal of personal data in accordance with the law, are taken by INA Prime Solutions.

12.2 The technical measures taken by INA Prime Solutions due to the processed personal data are listed:

- With Penetration tests, the risks, threats, vulnerabilities and gaps, if any, of INA's information systems are revealed and necessary measures are taken.
- As a result of real-time analysis with information security event management, risks and threats that will affect the continuity of information systems are constantly monitored.
- Access to information systems and authorization of users are done through access and authorization matrix and security policies over the corporate active directory.
- Necessary measures are taken for the physical security of INA's information systems equipment, software, and data.
- By establishing access procedures within the company, reporting and analysis studies regarding access to personal data are carried out.
- Access to storage areas containing personal data is recorded and inappropriate access or access attempts are kept under control.
- INA Prime Solutions takes the necessary measures to ensure that deleted personal data are inaccessible and unavailable for relevant users.
- In case personal data is illegally obtained by others, a suitable system and infrastructure has been established by INA in order to notify the relevant senior management.
- Security vulnerabilities are followed, appropriate security patches are installed and information systems are kept updated.

- The strong passwords for the electronic media that personal data processed in are used.
- Secure record keeping (logging) systems are used in electronic media where personal data are processed.
- Data backup programs are used to ensure the safe storage of personal data.
- Access to personal data stored in electronic or non-electronic media is restricted according to access principles.
- The specific policies regarding the special categories of personal data are established.
- Adequate security measures are taken in the physical environments where personal data of special nature are processed, stored and / or accessed, and unauthorized entry and exit are prevented by ensuring physical security.

12.3 The administrative measures taken by the company in relation to the personal data it processes are listed below:

- So as to improve the qualifications of employees, training is provided on the prevention of unlawful processing of personal data, prevention of unlawful access to personal data, to provide the maintenance of personal data, communication techniques and technical knowledge skills.
- Employees are made to sign confidentiality agreements regarding the activities conducted by INA Prime Solutions.
- A disciplinary procedure has been prepared for employees who do not comply with security policies and procedures.
- Periodic and random audits are conducted within the company
- Information security training is provided for employees.

13. Data Disposal Methods

13.1. Deletion of Personal Data

DATA REGISTRY MEDIA	DISPOSAL METHOD
Personal Data on Servers	For the personal data which the required storage durations of them have expired on the servers, the system administrator will remove the access authority of the relevant users and delete them.
Personal Data in Electronic Media	The personal data, which are in the electronic media and which the required storage durations of them have expired, are made inaccessible and unusable for other employees (relevant users),

	except for the database administrator.
Personal Data in Physical Media	Except for the department manager responsible for the document archive, the personal data which are kept in physical media and which the required storage durations of them have expired, are made inaccessible and unusable in any way.
Personal Data in Portable Media	The personal data which are kept in flash-based storage media and which the required storage durations of them have expired, are stored in secure environments with encryption keys, encrypted by the system administrator and the access authority is given only to the system administrator.

13.2. Destruction of the Personal Data

DATA REGISTRY MEDIA	EXPLANATION
Personal Data kept in the Physical Media	The personal data which are kept in the papers and which the required storage durations of them have expired, are irreversibly destroyed in the paper trimming machines.
Personal Data in the optical/magnetic media	The personal data which are kept in the optical/magnetic media and which the required storage durations of them have expired, are physically destroyed by melting, burning, or pulverizing. Moreover, magnetic media is passed through a special device and exposed to a high magnetic field, making the data on it unreadable.

13.3. Anonymization of Personal Data

13.3.1 The anonymization of personal data is to render personal data in no way associated with an identified or identifiable natural person, even if they are matched with other data.

13.3.2. The destruction and anonymization processes are recorded by the data management unit and the records are kept for 3 years.

14. Storage and Disposal Durations

14.1. Regarding the personal data being processed by INA Prime Solutions, the personnel assigned to manage the data are updated on storage and disposal durations and procedures and retrained when required. For personal data whose retention periods have expired, the process of deletion, destruction or anonymization is carried out by the relevant personnel.

Storage and disposal times table by processes

Data Category	Data Storage Duration / Disposal Times
Identity	10 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Communication	5 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Location	5 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Employee	10 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Legal Transactions	10 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Physical Space Security	1 Year / The first periodical disposal time afterwards the conclusion of the storage duration

Risk Management	5 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Occupational Experience	5 Years / The first periodical disposal time afterwards the conclusion of the storage duration
Visual/Audial Records	1 Months / The first periodical disposal time afterwards the conclusion of the storage duration

15. Periodical Disposal Duration

15.1. INA Prime Solutions has determined the periodic destruction period as 6 months. Accordingly, periodic destruction is carried out in the company in June and December of every year.

16. Publishing and Maintaining this Policy

16.1 The policy is published in two different media as wet signed (printed paper) and electronically and disclosed to the public on the website. The printed paper copy is also kept in the *"Information Security Manual"*.

17. Update Period, Enforcement and Termination of the Policy

17.1 Policy, in terms of the necessity, is reviewed and the required sections are updated.

17.2. Policy, afterwards the publication on the website of INA Prime Solutions (inaprime.com) is assumed to be entered into force.

17.3. In case that the termination is decided, policy is canceled (by "cancel" stamping or written "canceled" on it) by the senior management of INA Prime Solutions (or the authorized unit or the managers) and signed, and at least 5 years, stored in the private archive.

Review and update of this document will take place when changes require revising the **Personal Data Storage & Disposal Policy**. Such modifications may relate to changes in roles and responsibilities, release of new legislation or the identification of a new policy area, in consultation with appropriate members and their approval on all revisions to this Personal Data & Disposal Policy. When approved a new version of the policy will be issued and all affected departments will be informed of the changes.