

Data Retention Policy

This **Data Retention Policy** ("**Policy**" hereinafter) has been prepared by _____ ("**Company**" hereinafter) and enforced by the board decision on _____ to fulfill obligations arising from the legislation regarding data protection and privacy and to inform data subjects regarding the retention of the data.

I. Definitions

The purpose of this Policy is to regulate the methods and principles regarding data privacy and retention of data. In this policy, the terms are used with the following meaning;

The Term	Definition

II. Principles

The Company acts within the framework of the following principles in the retention of the data:

- The Company is acting completely complied with the applicable data privacy regulations and the provisions of the relevant legislation, Board decisions and the provisions of this policy in the operation of data retention.
- All transactions regarding the retention and storage of the data are recorded by the Company and these records are kept for at least _____ years, excluding other legal obligations.

- The appropriate ways of the retention of the data will be selected on its own motion by the Company unless a contrary decision is taken by the regulatory authority.

III. Legal Reasons for Retention

The reasons of storage as follows:

- Storing data as it is directly related to the establishment and performance of contracts,
- Storing the data for the purpose of establishing, exercising or protecting of a right,
- Storing the personal data when it is mandatory to store for the legitimate interests of the Company, under the condition that not harm fundamental rights and freedoms of individuals,
- Storing the personal data for the purpose of fulfilment of any kind of legal obligation,
- The storage of the data clearly foreseen in the legislation,
- Storing the personal data pursuant to the explicit consent of the data owners, when explicit consent is required.

IV. Duration of Retention

The following criteria are used to determine the retention periods of the data obtained by the Company in accordance relevant legislation;

- If a period of time is stipulated in the legislation or decisions of regulatory authority regarding the storage of the personal data, this period shall be complied with.
- If the period stipulated in the legislation regarding the storage of the said personal data expires or if no period is stipulated in the relevant legislation regarding the storage of the said data, retention periods are determined taking into account the legitimate interests of the Company and the rights of those concerned.

Personal data that storage period has expired is erased or destructed in _____ monthly periods according to the procedures stated in this Policy. All operations regarding the erasure, disposal and anonymization of the data are recorded with a report, and these records are kept for at least _____ years, excluding other legal obligations.

V. Technical and Administrative Precautions

For the purposes of storing the data securely, preventing illegal processing/accessing to the data and disposal of data eligibly to law, all administrative and technical measures taken by the Company are listed below;

Administrative Precautions

Within the scope of administrative measures, the Company;

- Restricts internal access to stored data to the employee who is required to access it as per job description. While restricting access, sensitive data and its importance are also considered.
- If other individuals obtain the processed data unlawfully, notify the relevant person as soon as possible.
- Regarding the transfer of the data, provides data security by signing a framework agreement on the protection of data and data security with the persons to whom data is shared or by the provisions added to the existing contract.
- Employs knowledgeable and experienced employees about the processing of data and provides the employees with the necessary education within the scope of data protection legislation and data security.
- To ensure adequate security measures are being taken (against electrical leakage, fire, flood, theft, etc.) according to the area where the data is located and prevent unauthorized entrance and exit to these areas.

Technical Precautions

Within the scope of technical measures, the Company;

- Makes required internal controls within the scope of established systems.
- Conduct the processes of information technology risk assessment and business impact analysis within the scope of established systems.
- Ensures the technical infrastructure to prevent or monitor the leakage of data outside of the institution and the creation of relevant matrices.
- Ensures the access to data of employees in information technology units is kept under control.
- Ensures the disposed personal data cannot be reversed and leaves no audit trail.
- Protects all kinds of digital media where the data is stored with encrypted methods in a way that meets information security requirements,
- Ensure the necessary security tests are carried out regularly by constantly monitoring the security updates of the areas where the data is located.

VI. Enforcement

This Policy will enter into force by being announced to all employees and will be binding on all business units, consultants, external service providers and anyone processing personal data as of its date of entered into force. It will be the responsibility of the supervisors of the relevant employees to monitor whether the employees fulfil the requirements of the policy. When a violation of the policy is detected, the issue will be immediately reported to a higher supervisor.

Board Chairman

Name

Date

Signature

Board Member

Name

Date

Signature

Board Member

Name

Date

Signature



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