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## **DATA STORAGE AND DESTRUCTION PROCEDURE**

### **1. Purpose:**

The purpose of this Policy is to determine the rules, roles and responsibilities applicable throughout organization for the fulfillment of the obligations on the retention and destruction of personal data as required by Articles 5 and 6 of the Regulation on the Deletion, Destruction or Anonymization of Personal Data, issued based on the Law No. 6698 on the Protection of Personal Data and published on the Official Newspaper No. 30224, dated 28.10.2017 and other obligations specified in the Regulation.

### **2. Scope:**

This policy covers all personal data and special categories of personal data processed by the university, which belong to university staff, students, graduates, staff candidates, student candidates, visitors, employees of the institutions which university cooperates with, and third parties.

Unless otherwise stated in the policy, personal data and special categories of personal data will be named as "Personal Data".

### **3. Responsibilities:**

All staff who store and process personal data within university shall be responsible for fulfilling the requirements for the destruction of personal data specified in the Law, the Regulation, and the Policy.

Each unit is obliged to store and protect the data produced in its own work process.

### **4. Definitions and Abbreviations:**

**Anonymization:** Refers to rendering personal data impossible to associate with a specific or identifiable natural person, even if it is paired with other data.

**Destruction:** Refers to the deletion, disposal or anonymization of personal data.

**Personal Data:** Refers to any information relating to an identified or identifiable natural person.

**Personal Data Processing Inventory:** Refers to the inventory through which data controllers explain and detail the personal data processing activities they carry out depending on their business processes, the purposes of processing personal data, data categories, the maximum time periods they have established by associating with transferred group of recipients and data subject group of people and necessary for the purposes for which personal data are processed, personal data required to be transferred abroad and measures taken in relation to data security.

**Deletion of Personal Data:** Refers to the process of making personal data inaccessible and unavailable for the users concerned.

**Destruction of Personal Data:** Refers to the process of making personal data inaccessible, non-retrievable and re-useable by any person in any way.

**Special Categories of Personal Data:** Refers to data on a person's race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, costume and attire, membership to any association, foundation or trade union, health, sexual life, criminal conviction and security measures and biometric and genetic data of such person.

**Periodic Destruction:** Refers to the process of deleting, destroying or anonymizing, specified in the personal data retention and destruction policy, which will be carried out ex officio at certain intervals in the event that the conditions for processing personal data, as defined in the Law, completely disappear.

**Data Recording System:** Refers to the recording system in which personal data is configured and processed by certain criteria.

## **5. Reference Documents:**

- Personal Data Protection Law No. 6698
- Regulation on the Deletion, Destruction or Anonymization of Personal Data No 30224 dated 28.10.2018

## **6. Application**

### **6.1. Destruction of Personal Data**

In the event that the purpose for the processing of personal data disappears, the express consent has been withdrawn or the conditions of processing of personal data in Articles 5 and 6 disappear or in the event that there is a situation in which none of the exceptions in the said Articles can be applied, personal data for which the conditions of processing disappear shall be deleted, destructed or anonymized by the relevant business unit by taking into account the relevant business needs and explaining the justification of the method applied within the scope of Articles 7, 8, 9 or 10 of the Regulation. However, in case of a finalized court order, the destruction method ruled by the court order must be applied.

### **Methods of Deleting Personal Data**

- a. Personal Data on Paper Form: Deleted using the blackout method.
- b. Office Files on the Central Server: Deleted with the delete command in the operating system.
- c. Personal Data on Removable Media: Deleted with appropriate software.
- d. Databases: Relevant lines containing personal data are deleted with database commands.

### **Methods of Destroying Personal Data**

- a. Personal Data in Local Systems: Destroyed by using one of the appropriate methods which are de-magnetizing, physical destruction, and overwriting.
- b. Personal Data in Environmental Systems:

I. Network devices (switches, routers, etc.): Destroyed by the appropriate methods specified in article a.

ii. Flash-based media: Destroyed by using recommended methods of the manufacturer or by methods specified in article a.

iii. Magnetic tape: Destroyed by de-magnetizing or physical methods such as burning or melting.

iv. Sim Card and fixed memory cards: Destroyed by the appropriate methods specified in article a.

v. Optical discs: Destroyed by physical methods such as burning, breaking into small pieces, melting.

vi. Peripheral units with Data Recording media: Destroyed by the appropriate methods specified in article a.

c. Personal Data on Paper Media:

Destroyed by using paper shredders. Scanned personal data from the original papers are destroyed by appropriate methods.

**Anonymizing Methods of Personal Data:** In the process of anonymizing personal data, an appropriate method is used from the Directory of Deletion, Destruction and Anonymization of Personal Data published by the Personal Data Protection Institution.

As a result of periodic reviews or when it is determined at any time that the conditions for processing of data have disappeared, the relevant user or data subject shall decide to delete, destruct or anonymize the relevant personal data from the recording media under their responsibility in accordance with this policy. In case of doubt, data owner may refer to the opinion of the unit.

In the destruction of data the regulation of the retention period, shown in the directory published by the General Directorate of State Archives, is taken into consideration. In the archives of the unit, the institution or the state, the data which is safe to dispose is destroyed when the required periods are expired.

### **6.1.1 Destruction of Multi-Stakeholder Data**

When a decision is required to be taken on the destruction of multi-stakeholder personal data in Central Information Systems, the opinion of the Data Responsible Representative is taken and according to this policy, the mentioned personal data is decided to be either stored, deleted, destroyed, or anonymized.

### **6.1.2 Destruction of Personal Data upon Data Owner's Request**

When a natural person who owns a personal data applies to university and requests the deletion, destruction or anonymization of personal data under Article 13 of the Law by submitting Data Owner Application form, the request shall be concluded no later than thirty days after the application date. Requests for the deletion or destruction of personal data shall be assessed only if the person concerned has been identified. The person concerned shall be informed thereof. In cases where all the conditions for processing personal data have not disappeared, requests by personal data subjects for deletion or destruction of their data may be rejected. The rejection shall be notified to the person concerned. It shall be immediately examined whether all the conditions for processing the said personal data have disappeared. If all the conditions for processing have disappeared, university shall delete, destruct or anonymize the personal data no later than three months. If all the conditions for processing have disappeared and the personal data, subject matter of the request, have been transferred to third-parties, the unit concerned shall immediately notify the third-person to whom the personal data has been transferred and shall ensure that the necessary actions are taken by the third-person in accordance with the Regulation.

### **6.2. Periodic Review of Personal Data**

All users and data subjects who process or store personal data shall review whether or not the conditions for processing have disappeared in the data recording media they use, at the latest within six months. Upon the application of the personal data subject or the notification of the Board or a competent court, the relevant user shall undertake this review in the data recording media they use, irrespective of the period of periodic review. All actions taken relating to the deletion, destruction or anonymization of personal data shall be recorded, and such records shall be kept for at least three years, with the exception of other legal obligations.

The general principles in Article 4 of the Law and the technical and administrative measures to be taken within the scope of Article 12, the relevant legislative provisions, the decisions of the Board and the court decisions must be complied with when deleting, destructing or anonymizing personal data.

### **6.3. Storage of Personal Data**

The periods of personal data processes are specified in the "Personal Data Processing Inventory".

These retention and destruction periods shall be taken into consideration for periodic destructions or on-demand destructions. Storage and disposal processes may vary at the request of the data subject, unless there is a legal obligation. In order to ensure personal data security, physical security related measures have been taken. Paper form documents and CD, DVD and USB devices that may contain personal data are locked when not in use. These documents and devices are only accessed by authorized staff and entrances/exits are monitored with cameras. Servers with personal data are stored in the university system room with the necessary security measures. Administrative and technical measures taken to ensure the security of personal data are clearly specified in the Policy of Personal Data Protection and Processing.

## **7. Reference Documents**

- Law No. 6698 on Protection of Personal Data,
- Regulation on Deletion, Destruction or Anonymization of Personal Data

## **8.Related Documents**

- Personal Data Protection and Processing Policy
- Personal Data Owner Application Form

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