



DOĞAN ŞİRKETLER GRUBU HOLDİNG A.Ş.

POLICY ON PROTECTION AND PROCESSING OF PERSONAL DATA

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1. OBJECTIVE

As the Doğan Group; it is our priority to ensure that the personal data of natural persons associated with our Company, including our customers, consumers, subscribers, and employees is processed in compliance with the relevant legislation, leading with the Constitution of the Republic of Turkey, and the international human rights conventions whereby our country is a party, as well as the Law on the Protection of Personal Data No. 6698 (“LPPD”), and to ensure that the relevant individuals whose data is processed can exercise their rights in an effective manner.

Therefore, we are carrying out all procedures related with processing, storing, and transferring all personal data we have obtained in association with, including but not limited to, our employees, subscribers, consumers, visitors, business contacts, business partners, customers, dealerships, users who visit our website, in short all personal data we have obtained during the course of our activities, in compliance with the Doğan Group Personal Data Protection and Processing Policy (“Policy”).

The protection of personal data and the monitoring of the fundamental rights and freedoms of natural persons whose personal data is collected constitute the basic principle of our policy governing the processing of personal data. We therefore, carry out all our activities whereby personal data is processed, by respecting the protection of the privacy of personal lives, confidentiality of communication, freedom of thought and faith, and the right to use effective legal remedies.

We take all administrative and technical measures necessary for the protection of personal data in accordance with applicable legislation and current technology, as required by the nature of the relevant data.

This policy hereby explains the methods we deploy for processing, storing, transferring, and deleting, or making anonymous, the personal data shared during our commercial or social responsibility projects and similar activities as per the principles referred to in the LPPD.

2. SCOPE

All data we have obtained from, including but not limited with, our employees, subscribers, consumers, visitors, business associates, business partners, customers, prospective customers, suppliers, dealerships, users who visit our website, in short all data we have acquired during the course of our activities, and processed by the Doğan Group are included in the scope of this Policy.

Protection of personal data is only related with natural persons, and information that belongs to legal entities which does not contain information related to the natural



persons is excluded from the scope of personal data protection. Therefore, this Policy hereby is not applicable for the data that belongs to legal entities.

Our policy is implemented for activities associated with the processing of all personal data owned or managed by the Doğan Group, and has been dealt with and prepared taking into consideration the LPPD and other legislation governing personal data as well as the international standards in this area.

3. DEFINITIONS and ABBREVIATIONS

This section briefly explains the special terms and phrases, concepts and acronyms mentioned in this policy.

- 3.1. Doğan Holding** refers to Doğan Şirketler Grubu Holding A.Ş.
- 3.2. Doğan Group (Group)** refers to the Doğan Şirketler Grubu Holding A.Ş. and its affiliates, subsidiaries as well as its business partnerships
- 3.3. Express Consent:** Approval on a certain matter, based on having been informed and on free will, adequately express in a manner that leaves no room for hesitation, restricted to that particular transaction only.
- 3.4. Anonymization:** Personal data being anonymized in such a way that it cannot, in any manner whatsoever, even by matching with other data, be associated with a certain, or identifiable natural person.
- 3.5. Employee** refers to Doğan Group staff.
- 3.6. Owner of the Personal Data (Data Subject):** Natural person whose data is processed.
- 3.7. Personal Data:** Any and all information related with a certain, or identifiable natural person.
- 3.8. Personal Data of Private Nature:** Data related with individuals' racial or ethnic origin, political opinions, philosophical beliefs, religious, sectarian, or other faiths, clothing, association, foundation or trade-union memberships, data concerning their health, sex life, penal convictions, data related with security measures, as well as their biometric and genetic data.
- 3.9. Processing Personal Data:** Any and all operations performed upon data such as obtaining personal data through entirely or partially automatic means, or through non-automatic means upon being a part of any data registry system, storage, safe-



keeping, alteration, re-organization, disclosure, transfer, receiving the transfer thereof, making available, classification, or blocking the use thereof.

- 3.10. Data Processor:** Natural person or legal entity processing personal data on behalf of the data controller pursuant to the power granted by the data controller.
- 3.11. Data Controller:** Natural person or legal entity that establishes the objectives and means of processing personal data, and responsible for building and managing the data registration system.
- 3.12. PDP Board:** Personal Data Protection Board.
- 3.13. PDP Authority:** Personal Data Protection Authority.
- 3.14. LPPD:** Law on the Protection of Personal Data published in the Official Gazette of April 7, 2016, No. 29677.
- 3.15. REA:** Registered Electronic Mail address. It is the system that protects any and all commercial and legal correspondence and document sharing as they have been sent, that establishes the recipient's identity in an exact manner that ascertains that the content is not altered, and that renders the content into a legally valid and secure final evidence.
- 3.16. Policy** refers to Doğan Group Policy on Protection and Processing of Personal Data.

4. ROLES AND RESPONSIBILITIES

4.1. Board of Directors

The Board of Directors is responsible for the supervision of the establishment and enforcement of the reporting, inspection and enforcement mechanisms put into place in case of failure to comply with the policy, rules and regulations.

4.2. Executive Committee

Policy on Protection and Processing of Personal Data has been approved by Executive Committee. The Executive Committee is the authorised approval mechanism for preparing, developing, executing and updating this policy.

It is also responsible for

- taking the necessary measures to ensure the compliance of the external service providers together with its employees with this policy



- reporting the issues to the DOHOL Vice Presidency of Audit for the review of matters contrary to the Policy

4.3. General Counsel

General Counsel, together with Directorate of Information Systems, is responsible for preparing, developing, executing and updating this policy. General Counsel reviews this policy, when necessary, in terms of its actuality and need for development.

4.4. Directorate of Information Systems

Directorate of Information Systems, together with General Counsel, is responsible for preparing, developing, executing and updating this policy. Directorate of Information Systems reviews this policy, when necessary, in terms of its actuality and need for development.

Doğan Holding Information Systems Manager is responsible for publishing the prepared document on the corporate portal.

4.5. Vice Presidency of Corporate Communication

Doğan Holding Vice Presidency of Corporate Communications is responsible for the in-house distribution of the prepared document.

4.6. Directorate of Investor Relations

Within the framework of this policy, the Directorate of Investor Relations is responsible for regulating the relations between the corporate investors, portfolio managers, analysts, current and potential investors of the Doğan Group and for carrying out public disclosure practices in a transparent way notifying all the concerned parties simultaneously. The head of Doğan Holding Investor Relations is responsible for publishing the prepared document on the company website.

5. LEGAL OBLIGATIONS

The legal obligations of the data controller within the scope of protecting and processing personal data pursuant to the LPPD are listed below:

5.1. Obligation to provide information

As we are collecting the personal data, we are obliged to provide information about

- The purpose your personal data will be processed for,
- Information on our identity, and the identity of our representative, if any,

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- To whom, and with what purpose your personal data that has been processed can be transferred to,
- Our method of data collection and the legal grounds,
- Rights arising from the Law to the Data Subject.

As the Doğan Group, we take care that this Policy hereby, which is public, is clear, comprehensible, and easily accessible.

5.2. Obligation to ensure data security

As the data controller, we are taking the administrative and technical measures set forth in the legislation to ensure the security of the personal data under our responsibility. Data security related obligations and the measures taken are detailed in Section 9 of this Policy hereby.

6. CLASSIFICATION OF PERSONAL DATA

6.1. Personal data

Personal data is any and all information related with a certain, or identifiable natural person.

Protection of personal data is only related with natural persons, and information that belongs to legal entities which does not contain information related to the natural persons is excluded from the scope of personal data protection. Therefore, this Policy hereby is not applicable for the data that belongs to legal entities.

6.2. Personal Data of Private Nature

Data related with individuals' racial or ethnic origin, political opinions, philosophical beliefs, religious, sectarian, or other faiths, clothing, association, foundation or trade-union memberships, data concerning their health, sex life, penal convictions, data related with security measures, as well as their biometric and genetic data is defined as personal data of private nature.



7. PROCESSING PERSONAL DATA

7.1. Our principles associated with processing personal data

We process personal data as per the below specified principles.

7.1.1. Processing data in compliance with the law and rules of integrity

We process personal data in compliance with the rules of integrity, and in a transparent manner, in line with our obligation to provide information.

7.1.2. Ensuring that personal data is accurate, and updated when necessary

We take the relevant measures within our data processing procedures to ensure that the data processed is accurate and current. We allow the data subject to apply to us to update his/her data, and to correct the errors in his/her data that has been processed, if any.

7.1.3. Processing data with definite, express, and legitimate purposes

As the Doğan Group, we process personal data within the confines of our legitimate purposes as set forth to further our operations in the course of the normal flow of legislation as well as business life, the scope and contents of which are clearly defined.

7.1.4. Keeping personal data relevant, limited to and on par with the purposes for which they are processed

We process personal data relevant, limited to and on par with a purpose which we have defined in clear and definite terms.

We refrain from processing personal data that is not relevant or does not need to be processed. For this reason, we do not process personal data that is private in nature unless there is a legal requirement, and we take explicit consent when we need to process such data.

7.1.5. Keeping personal data stipulated by statutory regulations and storage of such data for the duration of our legitimate business interests

Many regulations in the legislation require personal data to be stored for a certain period of time. We therefore store personal data we process for as long as it is required by the applicable legislation or for the duration necessary for the purpose of processing personal data.



In cases where the duration of storage as prescribed by the legislation expires, or the purpose for processing such data is no longer present, we delete, destroy or anonymize personal data. Our principles and procedures regarding retention periods are provided in detail in Chapter 9 of this Policy hereby.

7.2. Our purposes for processing personal data

As the Doğan Group, we process personal data for similar purposes, including, but not limited to, those listed below:

- Execution of our operations,
- Providing support services to our clients within the scope of the contract, and service standards,
- Determining the preferences and needs of our customers and shaping, as well as updating of the services to be provided to our customers within this scope,
- Ensuring our legal obligations are fulfilled as required or mandated by legal regulations,
- Being able to conduct market researches and statistical studies,
- Surveys, contests, promotional campaigns and sponsorships,
- Evaluating employment applications,
- Contacting persons who are in a business relationship with the Doğan Group,
- Marketing,
- Compliance management,
- Vendor / supplier management,
- Advertising,
- Legal reporting,
- Billing.

7.3. Processing personal data of private nature

We process private data by taking administrative and technical measures as set forth by the laws and as prescribed by the PDP Board, and if express consent is given, or in cases where legislation requires it.

Since personal data that is private in nature that are concerning health and sex life are processed by persons or authorized bodies and institutions that are bound by confidentiality for the purpose of protecting public health, protective medicine, medical diagnosis, furthering of treatment and care services, planning of health services and its financing, we do not process such data with the exception of our

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employees' data. As for such data of our employees, they may be processed by persons who are prescribed by the laws.

7.4. Exceptional cases in the processing of personal data where express consent is not sought

We may process personal data in exceptional cases required by law as listed below, without securing express consent:

- If set forth expressly in the laws;
- In cases where processing of personal data of parties to a contract is required, provided such action is directly related to the establishment or execution of said contract;
- In case it is mandatory to process data for establishing, exercising, or protecting a right;
- In case it is mandatory for us to process your data for our legitimate interests as the Data Controller, provided that fundamental rights and freedoms are not harmed.

Exceptional circumstances whereby personal data of private nature may be processed without the express consent of the data subject are specified in Article 7.3 of this Policy hereby.

8. TRANSFER OF PERSONAL DATA

8.1. Transfer of personal data within the country

As the Doğan Group, we act in accordance with the decisions and regulations stipulated in the LPPD and, agreed upon by the PDP Board, with regards to the transfer of personal data.

Without prejudice to the exceptional circumstances set forth in the legislation, personal data and data of private nature shall not be transferred to other natural persons or legal entities without the explicit consent of the data subject.

In exceptional circumstances as stipulated by the LPPD and other legislation, without the explicit consent of the data subject, the data may be transferred to an authorized administrative or judicial institution or organization in accordance with the legislation and bound by the boundaries.



Moreover, under the exceptional circumstances stipulated by the legislation, as well as the

- cases detailed by Article 7.4. of the Policy,
- in the cases listed in Article 7.3. of the Policy with regards to the personal data of private nature,
- such personal data of private nature related with the health and sex life of the data subject can be transferred to persons or authorized institutions and bodies under the obligation to maintain confidentiality only for the purposes of protecting public health, protective medicine, medical diagnosis, furthering of treatment and care services, planning and management of health services and its financing, upon taking the measures stipulated by the PDP Board and the relevant legislation without seeking express consent.

8.2. Transfer of personal data outside the country

As a rule personal data may not be transferred outside the country without the express consent of the data subject. However, in the cases of the presence of one of the exceptional circumstances set forth in Articles 7.3 and 7.4 of this Policy hereby, personal data may be transferred outside the country only in cases the third parties outside the country are

- located in countries with adequate protection as announced by the PDP Board;
- In case they are located in countries where there is no adequate protection, if the data controllers in Turkey and in the relevant foreign country commit to an adequate protection, and the PDP Board's permission is granted.

8.3. Authorities and institutions to which personal data is transferred

Including, but not limited with, the following, personal data may be transferred to

- Our suppliers,
- Our business partners and business associates,
- Our affiliates and group companies,
- Legally authorized public authorities and institutions,
- Legally authorized special law professionals,
- Our shareholders,

in line with the above explained rules and principles.

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8.4. Measures we take to prevent illegal transfer of personal data

8.4.1. Technical measures

Including, but not limited with, the following, for the purpose of protecting personal data;

- We carry out the internal technical organization in order to ensure that the personal data is processed and stored in compliance with the legislation,
- We create the technical infrastructure in order to ensure the security of the databases where your personal data will be stored,
- We monitor and inspect the processes of the technical infrastructure that has been created,
- We establish procedures for reporting the technical measures we take, as well as the audit processes,
- We regularly update and renew technical measures,
- We re-examine the risky situations and generate the necessary technical solutions,
- We use virus protection systems, firewalls, and similar software or hardware driven security instruments, and build security systems that are compliant with technological developments,
- We employ staff members who are experts in technical matters.

8.4.2. Administrative measures

Including, but not limited with, the following, for the purpose of protecting your personal data;

- We prepare policies and procedures for accessing personal data including the employees of our group companies and affiliates,
- We inform and train our employees for protecting and processing personal data in compliance with the law,
- We set forth measures to be taken in cases personal data is processed illegally by our company employees, within the contracts we execute with our employees and/or in the policies we issue,
- We inspect and audit the activities associated with processing personal data by the data processing parties we work with or the partners of such data processing parties.



9. STORAGE OF PERSONAL DATA

9.1. Storage of personal data for the purpose stipulated in the relevant legislation or for the purpose they have been processed for, and for the necessary period

We store the personal data for the period required by the purpose of processing, provided that the storage periods for personal data stipulated in the legislation are reserved.

In cases where we process personal data for more than one purposes, in case the purposes of processing cease to exist, or in case it is decided to delete the data upon the request of the Data Subject if the legislation does not prevent it, the data is deleted, destroyed, or stored after being anonymized. We comply with the provisions of the legislation and the resolutions of the PDP Board for destroying, deleting, or anonymizing procedures.

9.2. Measures we take for the storage of personal data

9.2.1. Technical measures

- We build technical infrastructures, and create audit mechanisms in order to delete, destroy, and anonymize personal data,
- We take the necessary measures to store personal data in a secure manner,
- We employ staff members who have technical expertise,
- We prepare contingency plans for risks that may arise, and develop systems for the implementation thereof,
- We build security systems in accordance with technical developments related with the storage areas of personal data.

9.2.2. Administrative measures

- We create awareness by informing our employees about the technical and administrative risks related with the storage of personal data,
- We add provisions related with taking the necessary storage measures to ensure that the transferred personal data is protected and stored in a secure manner in contracts executed with companies where personal data is transferred to, in cases of cooperation with third parties for the storage of personal data.



10. SECURITY OF PERSONAL DATA

10.1. Our obligations about the security of personal data

We take administrative and technical measures in relation with personal data in order to

- Prevent illegal processing,
- Prevent illegal access,
- Ensure legal storage, in accordance with our technological capabilities and implementation costs.

10.2. Measures we take to prevent illegal disclosure of personal data

- We carry out the necessary audits and ensure that they are carried out within our group,
- We train and inform our employees about processing personal data in compliance with the law,
- Activities carried out by our Group and the Group companies are particularly reviewed in detail by all business departments, and following such review, personal data is processed in accordance with the commercial activities carried out by the relevant departments,
- Includes provisions related with the required security measures to be taken by the people accessing personal data, in contracts executed with companies providing access to personal data whereby co-operation with third parties is carried out for processing personal data,
- In case personal data is disclosed in an illegal manner or in case of data leaks, we notify this to the PDP Board, and conduct the inspection stipulated by the legislation, and take the relevant measures.

10.2.1. Technical and administrative measures taken to prevent illegal access to personal data

In order to prevent illegal access to personal data;

- We employ staff members who have technical expertise,
- We regularly update and renew technical measures,
- Access authorization procedures are being created within the Group, and within our Group companies,



- We establish procedures for reporting the technical measures we take, as well as the audit processes,
- We create the data registration systems used in our group in line with the legislation, and we regularly conduct the relevant audits thereof,
- We prepare emergency aid plans for risks that may arise, and develop systems for the implementation thereof,
- We train and inform our employees in the matters of access to personal data and authorization,
- We add provisions related with the required security measures to be taken by the people accessing personal data, in contracts executed with companies providing access to personal data whereby co-operation with third parties is carried out for activities such as processing or storing personal data,
- We build security systems, in line with technological developments to prevent illegal access to personal data.

10.2.2. Measures we take in case of illegal disclosure of personal data

We take administrative and technical measures to prevent the illegal disclosure of personal data, and we update them in line with our relevant procedures. We build systems and infrastructures in order to notify the Data Subject and the PDP Board in case we discover that personal data is disclosed in an unauthorized manner.

In case of an illegal disclosure despite all administrative and technical measures that have been taken, and if deemed necessary by the PDP Board, this may be announced at the website of the PDP Board or by another method.

11. RIGHTS OF THE DATA SUBJECT

Within the scope of our obligation to provide information, we inform the Data Subject and we build systems and infrastructures for such information. We carry out the necessary technical and administrative adjustments to ensure that the Data Subject may exercise his/her rights related to his/her personal data.

The Data Subject is entitled to the following rights:

- To learn whether his/her personal data is being processed,
- To demand related information if his/her personal data has been processed,



- To learn about the purpose for his/her data being processed, and whether such data is being used for the relevant purpose,
- To know about the third parties his/her personal data is being transferred to in and outside the country,
- In case his/her personal data has been processed incompletely or wrong, to ask for the correction thereof,
- In case the reasons requiring his/her personal data to be processed cease to exist, to request the deletion or destruction of his/her data,
- To demand that the above-mentioned correction, deletion, or destruction procedures be notified to the third parties his/her personal data is transferred to,
- To object to a negative conclusion about the Data Subject, following the analysis of the data processed via automatic systems exclusively,
- To demand the reimbursement of damages in case losses are encountered due to his/her personal data being processed in a manner that is against the law, on his/her personal rights.

11.1. Exercising rights related with personal data

In case the PDP Board establishes a separate manner for submitting requests related with the Personal Data, the Data Subject may send his/her request through such method, or by mailing it to the address **Burhaniye Mahallesi Kısıklı Caddesi No: 65, 34676 Üsküdar / İstanbul** in writing, bearing an original signature or by sending it signed with secure electronic signature to our registered electronic mail address doganholding@hs02.kep.tr.

In his/her application that the Data Subject will submit for exercising the above-mentioned rights, containing explanations about the rights s/he wishes to exercise, the matter requested must be clear and understandable, the matter requested must be related to the applicant himself/herself, or if s/he is acting on behalf of another person, the applicant must be specifically authorized in this matter, with such authorization being documented, and the applicant's identity and address details must be included in the application as well as the documents certifying the applicant's identity.

Such requests shall be placed in person, and the requests placed by unauthorized third parties about personal data shall not be taken under assessment.



11.2. Assessment of the application

11.2.1. Deadline for answering the application

Requests about personal data are concluded in the shortest time, depending on the nature thereof, and within 30 (thirty) days at the latest in any case, free of charge, or in case the conditions set forth in the charge tariff to be issued by the PDP Board materialize, in return for the fee stipulated in the tariff.

Additional information and documents may be requested at the time of application, or when the application is being assessed.

11.2.2. Our right to reject the application

Applications about personal data;

- Processing personal data for purposes such as researching, planning, and statistics, by anonymizing it using official statistics,
- Processing personal data for the purposes of arts, history, literature, or science, or within the scope of freedom of speech, provided that it does not constitute a violation of private life, or does not breach personal rights, or does not constitute a crime,
- Processing personal data which has been made public by the Data Subject
- The application not being based on valid grounds,
- The application consisting of a request which is against the current legislation
- The application not complying with the procedures of application are grounds for refusal.

11.3. Manner for assessing the application

In order for the response period set forth in Article 11.2.1 of this Policy hereby to start again, the requests placed must be made in writing, bearing original signatures, or must be signed using electronic signatures, sent through the Registered Electronic Mail system, or you are required to send it together with the information and documents certifying the identity of the application, via other means specified by the PDP Board.



If the request is accepted, the relevant procedure is applied, and a notification is issued in writing, or in electronic medium. If the request is rejected, the justification thereof is explained, and is notified to the applicant in writing, or in electronic medium.

11.4. The right to raise a complaint with the Personal Data Protection Board

In case the application is rejected, in case the response we have provided is found insufficient, or in case an answer is not given in time, the applicant is entitled to raise a complaint with the PDP Board within 30 (thirty) days as of the date s/he has been notified of the answer, and in any case, within 60 (sixty) days as of the date of the application.

12. ISSUANCE AND STORAGE OF THE DOCUMENT

This Policy hereby shall be stored on two different media, namely on paper, and in electronic medium. The updated versions of the documents are posted on the corporate portal, and on the website.

Copies bearing original signatures are stored at the Office of the Vice Presidency of Financial and Administrative Affairs, and the controlled copies are stored by the Chief Legal Consultancy, and when required, there are destroyed by the Chief Legal Consultancy with the approval of the Department Manager

13. INTERVALS FOR UPDATING

This Policy hereby shall be reviewed at least once a year, and if required, they are updated as per the principles set forth in the Documentation Management Procedures.

14. EFFECTIVENESS

This policy hereby shall become effective on the date of acceptance by the Executive Committee.

15. ABOLISHING THE POLICY

In case it is decided that it will be abolished, the former copies of this Policy hereby, bearing original signatures shall be canceled by the Chief Legal Consultancy with the written approval of the Department Manager (by posting a cancellation stamp thereon, or by writing "canceled" on it), and shall be stored by the Office of the Vice Presidency of Financial and Administrative Affairs.