

## Data Retention and Logging Policy

This Data Retention and Logging Policy (“Policy”) explains the rules regarding the storage, logging, protection, and deletion of data processed by Atak Domain Bilgi Teknolojileri A.Ş. (“Atak Domain”, “We”).

This Policy has been prepared in compliance with KVKK, GDPR, ICANN RAA, local legislation, and other relevant regulations.

The API Usage Agreement, Privacy Policy, Abuse Prevention Policy, and Data Processing Agreement (DPA) are integral parts of this Policy.

### 1. Purpose and Scope

The purpose of this Policy is to define:

- the duration for which all personal data, technical logs, and transaction records processed by Atak Domain are retained,
- how they are stored,
- who can access them,
- security measures and deletion procedures.

This Policy applies to domain registration processes, hosting, DNS services, email, SSL, API, customer panel, payment systems, and all technical/operational processes.

### 2. Legal Basis

Atak Domain carries out data retention and logging processes in accordance with the following regulations:

- Turkish Personal Data Protection Law (KVKK - Law No. 6698)
- GDPR (General Data Protection Regulation)
- ICANN Registrar Accreditation Agreement (RAA) – Articles 3.4 and 3.5
- BTK / TRABIS regulations
- Electronic commerce and tax laws
- Law No. 5651 and traffic data retention requirements
- Financial record retention requirements (10 years)
- Requests from judicial authorities and law enforcement

### 3. Types of Data Retained

Atak Domain may retain the following categories of data:

#### 3.1. Domain registration data

- Whois information
- Technical, administrative, and billing contact details
- Domain transfer and renewal records
- ICANN-required notification records

- Domain usage history

Retention period: Minimum 2 years – required under ICANN RAA 3.4.2

### 3.2. Hosting and server logs

- access.log
- error.log
- FTP/SFTP logs
- SSH connection logs
- Control panel logs (cPanel/DirectAdmin/Plesk)

Retention period: 1 – 2 years

### 3.3. DNS logs

- DNS zone change records
- DNS query logs (anonymized)

Retention period: 1 year

### 3.4. Email logs

- SMTP sending logs
- IMAP/POP3 connection logs
- antispam logs

Retention period: 6 months – 1 year

### 3.5. Security logs

- firewall logs
- WAF (Web Application Firewall) logs
- IDS/IPS logs
- brute-force and attack attempt logs
- malware scan results

Retention period: 6 months – 2 years

### 3.6. API usage logs

- requested endpoint
- IP address
- parameters
- error logs
- authentication logs

Retention period: 2 years

### 3.7. Financial records

- payment history
- invoice data
- credit card token data (not stored by Atak Domain – stored by payment provider only)

Retention period: 10 years (legal requirement)

### 3.8. Customer communication logs

- support requests
- abuse reports
- system notifications

Retention period: 2 years

### 4. Logging Policy

Atak Domain logs the following activities to ensure system security:

- customer panel login/logout records
- failed login attempts
- API request logs
- DNS, email, and hosting activities
- system configuration changes
- domain transfer/renewal transactions
- data updates (excluding GDPR-protected changes)

#### 4.1. Integrity of logs

All logs:

- are protected with hash mechanisms,
- cannot be deleted or modified by unauthorized personnel,
- may be requested by courts and authorities when necessary.

### 5. Data Security

Atak Domain applies the following technical and administrative measures in data retention processes:

- AES-256 data encryption
- TLS 1.2+ communication security
- firewall (WAF, Firewall, IDS/IPS)
- access control and two-factor authentication
- role-based access control
- log integrity verification
- regular security testing
- processes aligned with ISO/IEC 27001 standards

### 6. Data Retention Periods

The table below summarizes the retention periods by data type:

Data Type	Retention Period	Basis
Domain Registration Data	2 years	ICANN RAA 3.4.2
Hosting Logs	1 – 2 years	Security & BTK
DNS Records	1 year	BTK
Email Logs	6 months – 1 year	Law No. 5651

API Logs | 2 years | Security & ICANN  
Financial Records | 10 years | Tax Law  
Support Records | 2 years | Terms of Service  
Security Logs | 6 months – 2 years | KVKK & Security

## 7. Data Access Rules

Data may only be accessed by:

- authorized Atak Domain technical staff
- legal department (when necessary)
- audit authorities
- official government institutions
- the data controller under GDPR/KVKK

All access is logged.

## 8. Sharing of Logs

Logs may be shared with third parties under the following conditions:

- court orders
- requests from prosecutors or law enforcement
- ICANN / registry mandatory requests
- GDPR compliance requirements
- abuse investigation processes
- customer request (after authorization verification)

Commercial confidentiality of the Customer is respected; unnecessary data is not shared.

## 9. Data Destruction Policy

All data whose retention period has expired is:

- securely deleted,
- destroyed in an irrecoverable manner,
- recorded in destruction logs.

Destruction methods:

- secure software-based deletion
- cryptographic erasure
- hardware destruction (when necessary)

## 10. Customer Rights

Customers have the right to:

- access their data,
- request correction of inaccurate data,
- request log sharing within legal limits,
- exercise all rights under KVKK/GDPR.

## 11. Policy Violations

In case of violation of this Policy, Atak Domain reserves the right to:

- suspend service,
- disable API/hosting access,
- forward records to authorities,
- terminate the agreement.

## 12. Enforcement of the Policy

This Policy:

- is effective as of the publication date,
- may be updated by Atak Domain,
- replaces previous versions upon publication of the new version.