

WITHIN THE SCOPE OF THE LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA

CLARIFICATION TEXT

This Clarification Text has been prepared in order to enlighten the data owners about the procedures and principles regarding the processing of Personal Data of patients / consultants applying to MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ "HYGIA MED" in accordance with the Law No. 6698 on the Protection of Personal Data ("KVKK"), the Regulation on Personal Health Data and the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform.

Ensuring the security of the Personal Data of patients/consultants is one of the primary objectives of HYGIA MED. For this reason, all necessary security measures are taken by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ in accordance with the applicable legislation in order to process the Personal Data of patients/consultants securely and to prevent any unlawful access or leakage of such data.

1) DATA RESPONSIBLE

Your Personal Data, within the scope of KVKK No. 6698 and "Mecidiye Mah. Ambarlıdereyolu Sk. No:15/4 Beşiktaş/İSTANBUL", **MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ**, which operates at the address of "Mecidiye Mah. **MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ** and all its affiliates, especially **MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ**, are accepted as "**Data Controller**" within the scope of KVKK and "**Controller**" within the scope of KVKK.

2) YOUR PERSONAL DATA TO BE PROCESSED

Your Personal Data and Sensitive Personal Data specified below, in accordance with the basic principles stipulated in Articles 4 and 5 of the LPPD In accordance with the basic principles stipulated in Article 4 and Article 5 of the KVKK, in line with the Personal Data Processing Conditions and Purposes specified in Articles 5 and 6 and Articles 6 and 9 of the KVKK and within the scope of the purposes stated in the Clarification Text; in accordance with the law, in connection with the purpose of processing, limited and measured, observing the principle of fairness and transparency, in an accurate and up-to-date manner, all kinds of technical and administrative measures stipulated in the legislation in order to ensure data security will be processed by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ.

Your Identity Information: Your name, surname, Turkish ID Number and/or Passport Number and/or Temporary Turkish ID Number, place and date of birth, marital status, gender, occupation, signature and other identification data that can identify you.

Your Contact Details: Your address (residence/workplace), telephone number (home/workplace fixed and/or mobile telephone numbers you have notified), e-mail address, social media accounts and other contact data.

Your Health Data: In order to make a medical evaluation regarding the treatment to be applied to you by coming to HYGIA MED for medical application purposes

Your Photo/Video Images and Audio Data: Your image and sound data contained in photographs and/or videos recorded before, during and/or after the medical procedure, as well as your video image data and sound recording data obtained from the cameras in our office under 24/7 closed recording.

Your Financial Information: Your bank account number, IBAN number, credit card information, billing and invoice information and other financial data.

Transfer and Accommodation Information: If you are a Health Tourist coming within the scope of International Health Tourism, your transfer information, flight ticket round trip information, hotel accommodation information.

3) PURPOSES OF PROCESSING YOUR PERSONAL DATA

Your Personal Data and Special Personal Data; To be able to carry out your post-operative care services, to carry out your checks after medical practice, treatment and operation processes, to carry out complication processes that may occur, to communicate with you personally, to manage appointment processes, to perform patient satisfaction and demand management, to fulfill legal and contractual obligations, to keep information that must be kept in accordance with the relevant legislation. To be able to preserve information regarding your health data within the specified periods, to ensure workplace safety, to fulfill legal obligations in accordance with the legislation within the scope of International Health Tourism, to plan transfer, accommodation and interpreter services of Health Tourist patients/clients within the scope of International Health Tourism, to be able to update innovations regarding medical treatment and practices. To be able to inform third parties about the applied medical procedures/operations, to carry out promotional and marketing activities regarding medical practices/operations implemented within the framework of the International Health Tourism Incentive legislation, to plan and manage health services and their financing, to be able to fulfill the responsibilities arising from the legal relationship established between the doctor and the patient. It is processed by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ in accordance with KVKK and , for the purposes of fulfilling financial and administrative obligations, ensuring technical security and fulfilling public obligations.

Your Personal Data and Special Qualified Personal Data will be processed by MEDİTRİNA TOURISM CONSTRUCTION CONSULTANCY HEALTH CONSULTANCY INDUSTRY AND TRADE LIMITED COMPANY within the scope of KVKK:

- **Your Identity Data;** will be processed in order to carry out treatment / post-operative care services, to create a patient file, to carry out patient satisfaction and demand management, to plan the transfer, accommodation and interpreter services of incoming Health Tourist patients / consultants within the framework of International Health Tourism.
- **Your Contact Information;** It will be processed in order to carry out your controls after treatment and operation processes, to manage appointment processes, and may also be processed for the purpose of promoting, informing and announcing innovations regarding medical treatment and applications, provided that you give your explicit consent.
- **Your Health Information;** It will be processed in order to create a patient file, to keep the information regarding your health data that must be kept in accordance with the relevant legislation within the period, to fulfil the legal obligations under the applicable Health Law and International Health Tourism Legislation.

- **Your Photograph, Video and Voice Recording Information;** MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ will be processed by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ in order to observe and manage the treatment and / or operation process, to ensure the safety of the practice and also to inform third parties about the medical procedure / procedures applied to you, provided that you give your explicit consent, and to manage promotional and marketing activities in accordance with the International Health Tourism Promotion legislation.
- **Your Financial Data** will be processed for the purpose of controlling your fee payments, issuing invoices and refunding any excess fees.
- **Your Transfer and Accommodation Information;** It will be processed in order to plan the transfer and accommodation services of Health Tourist patients / consultants coming within the framework of International Health Tourism.

Your Personal Data and Sensitive Personal Data mentioned above will be processed in accordance with the above-mentioned purposes and legislation in order to carry out your medical treatment/operation and to fulfil the obligations regarding the medical service provided. If you do not provide your relevant personal data, the legal obligations imposed on HYGIA MED, which will provide services in your medical treatment and/or operation, will not be fulfilled properly, and your operation, treatment and recovery processes will not be carried out successfully.

4) METHOD OF COLLECTING YOUR PERSONAL DATA

- Your Personal Data, depending on the services provided by HYGIA MED;
- By means of your health reports, laboratory and imaging results, analyses, your identity/passport and your health data, your declarations regarding your identity and contact information that you provide in order to make a medical evaluation regarding the treatment to be applied to you by coming to HYGIA MED for medical practice,
- By means of filling out the "Patient Information and Consent Form" regarding the treatment and/or operation to be applied by HYGIA MED,
- Through the contact form you fill out on HYGIA MED's corporate website www.HYGIA.MED.com,
- By means of electronic mails you will send to the corporate e-mail address (info@HYGIA.MED.com) of HYGIA MED, whose server is located domestically,
- By means of photographs/video records taken by HYGIA MED before, after and/or during the medical procedure applied to you,
- Upon your request and where necessary, MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ can diagnose and control you online via remote access by accepting their Privacy Policies and Foreign Transfer Principles in order to make your diagnoses and controls online by accepting their own Privacy Policies and Foreign Transfer Principles, using remote connection applications (whatsapp/zoom.us/facetime/skype/messenger/google/instagram/facebook etc.) and through your

written/audio/visual (photo and/or video recording) messages you send to HYGIA MED and your online audio/video calls you make through these applications,

- By accepting their own Privacy Policies and Overseas Transfer Principles, you can send a direct message to the profile account of HYGIA MED and/or comment on their posts on social media accounts (instagram, youtube, facebook, twitter, linkedin, etc.) whose server is located abroad,
- Through your information that you transfer by accepting their Privacy Policies and Overseas Transfer Principles by allowing it to be processed automatically through panels such as "contact us" or "get information" in the promotions and advertisements made by HYGIA MED through social media accounts (instagram, youtube, facebook, twitter, linkedin, google, etc.) whose server is located abroad,
- By means of security cameras under closed circuit recording in order to ensure workplace security within the scope of legitimate interest,

will be collected and processed by taking all administrative and technical measures stipulated by the KVKK and in order for HYGIA MED to fully and properly fulfil its contractual and legal obligations throughout the maintenance services.

5) PURPOSE, METHOD AND LEGAL REASON FOR PROCESSING YOUR PERSONAL DATA

Your Personal Data may be processed by real or legal persons authorised by HYGIA MED in the capacity of **"DATA PROCESSOR / PROCESSOR"**; by taking verbal, written, camera and photographic records, by keeping records in physical and electronic media together with all technical and administrative security measures required by the legislation, and by obtaining your explicit consent in cases stipulated by the relevant provisions of the KVKK and 's.

6) SITUATIONS WHERE YOUR EXPLICIT CONSENT MUST BE OBTAINED

- In accordance with Article 6/1/a and Article 5/1 of the KVKK, your Personal Data may be processed in the following cases only with your explicit consent;
- In order to promote, announce and inform you about the innovations regarding the services provided by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ, it will be possible to send sms messages and/or e-mails to you and to establish mobile communication only with your explicit consent.
- It will be possible to share your photographs and / or video recordings taken before, during and / or after the medical procedure in order to observe the development of the treatment on social media user accounts (instagram, youtube, facebook, twitter, linkedin, google, etc.) and corporate websites of HYGIA MED and all companies within the group of companies to which it is affiliated, only with your explicit consent.
- Since sharing your data through service providers whose servers are located abroad will be considered as "transfer abroad" and there is an "explicit consent requirement" for transfer abroad, your explicit consent will be obtained in such cases. However, in the following cases, since there will be no overseas transfer made by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ, your explicit consent will not

be sought, and your explicit consent will be deemed to have been obtained by the service provider you are using;

- In case you send written/voice messages and/or photo/video recordings or make audio/video calls to HYGIA MED by using the service providers (whatsapp/zoom.us/facetime/skype/messenger/google/instagram /facebook etc.) whose servers are located abroad, of which you are already a user by accepting the Confidentiality Agreement and Overseas Transfer Principles. In case you send a written / voice message and / or photo / video recording to HYGIA MED or make an audio / video call and request to receive remote examination / diagnostic service in this way; By accepting the policies of the aforementioned applications, you have accepted the processing of your Personal Data and Special Qualified Personal Data that you share with MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ through these applications in accordance with the KVK Clarification Text and Privacy principles of HYGIA MED, you have consented to contact you through the aforementioned applications and you are deemed to have given explicit consent to the aforementioned applications to transfer your data abroad in accordance with the policies of these applications whose servers are located abroad.
- In cases where you request to be contacted via electronic mail service providers (Hotmail, gmail, yahoo, etc.) whose servers are located abroad, of which you are currently a user by accepting its Privacy Policy and Overseas Transfer Principles; You are deemed to have given explicit consent to HYGIA MED's processing of your Personal Data and Sensitive Personal Data shared in the messages in accordance with its own KVK Clarification Text and Privacy principles and to the transfer of your data abroad in accordance with the policies of these service providers whose servers are located abroad that you have previously accepted.
- In cases where you apply for advertisements and promotions of HYGIA MED published on social media service providers (facebook, instagram, youtube, google, whatsapp, etc.) whose servers are located abroad. In cases where you apply for advertisements and promotions published on social media service providers (facebook, instagram, youtube, google, whatsapp, etc.); By accepting the Privacy and Overseas Transfer Principles of the relevant social media service providers, your data that you allow to be automatically processed and transferred abroad will be transferred to HYGIA MED by the relevant social media service provider and will be processed and stored by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ in accordance with its own Clarification Text and Privacy Principles that you have read. In these cases; You are deemed to have accepted the Clarification Text and Privacy Principles of HYGIA MED and the processing of your Personal Data and Special Qualified Personal Data in this direction, and you are deemed to have given explicit consent for HYGIA MED to reach you and contact you via your contact information.
- If you send a direct message to HYGIA MED's profile account on social media accounts (instagram, youtube, facebook, twitter, linkedin, etc.) whose server is located abroad, of which you are already a user by accepting their Privacy Policies and Overseas Transfer Principles; You are deemed to have given explicit consent for HYGIA MED to process your data in accordance with its own KVK Clarification Text and Privacy Principles and to contact you through the relevant application.

7) SITUATIONS WHERE YOUR DATA MAY BE PROCESSED WITHOUT EXPLICIT CONSENT

based on our legitimate interests pursuant to Article 6/1/f and Article 5/2/f of KVKK;

- Your Personal Data will be processed by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ without seeking your explicit consent in order to ensure the security of the practice, patient satisfaction and demand management.

In accordance with the legal and legal obligations pursuant to Article 6/1/c, Article 5/2/a and 5/2/ç of KVKK, your Personal Data will be processed without your explicit consent in the following cases;

- Creating a patient file.
- Maintaining information about your health data that must be kept in accordance with the relevant legislation.
- Invoice issuance by controlling your fee payments.
- Fulfilment of tax payments.
- Fulfilment of obligations in accordance with the Ministry of Health Legislation.
- Fulfilment of obligations in accordance with the International Health Tourism Legislation.
- Ensuring your data security.
- Fulfilment of legal obligations before Judicial Authorities.
- Performing administrative obligations before Administrative Institutions and Organisations.

8) TRANSFER OF YOUR PERSONAL DATA AND TO WHOM AND FOR WHAT PURPOSE

Your Personal Data and Special Personal Data collected in line with the conditions and purposes within the scope of the Personal Data Processing Conditions specified in Articles 5 and 6 and Articles 6 and 9 of KVKK No. 6698; In accordance with the 8th and 9th articles of KVKK and the 45th and 49th articles, MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ carries out and develops medical practice and post-operative care services, and receives consultation services from a specialist physician(s) when necessary, Fulfilling administrative obligations regarding International Health Tourism legislation, planning transfer, accommodation and translator services of Health Tourist patients arriving within the framework of International Health Tourism, communicating with patients, planning and managing health services and financing, managing promotion and marketing activities in accordance with International Health Tourism Promotion legislation. For the purposes of fulfilling the responsibilities arising from the legal relationship established between the doctor and the patient, fulfilling financial, legal and administrative obligations, ensuring technical security and fulfilling public obligations; To the extent that it is sufficient to achieve the purpose, it may be transferred to the third parties and institutions listed below by signing the necessary confidentiality agreements and providing all administrative and technical security measures in accordance with the legislation. In this context, your Personal Data processed by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ;

- Insured Employees,

- Private hospitals,
- Other specialists for consultation purposes,
- To your suppliers,
- Financial Advisors, Tax and Financial Consultants and Auditors
- Legal Counsellor
- Interpreters
- Overseas Promotion Marketing Consultant
- IT Consultant
- WEB Consultant
- "Clinic Management Software Programme" Service Provider
- Database (Server) Providers
- Public Institutions and Organisations authorised under the laws,
- It will be transferred to the Judicial Authorities.

9) PERSONAL DATA PROCESSING PERIOD

Your Personal Data will be stored by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ to the extent and for as long as it is legally obliged to store it. Documentation and storage obligations arise from local norms related to trade, tax and health legislation.

10) DATA SUBJECT AGE LIMIT WITHIN THE FRAMEWORK OF LEGISLATION

Within the scope of the LPPD, patients/consultants will be able to personally give consent for the processing of their personal data provided that they are at least 18 years old. Consents of patients/consultants below this age limit must be given by their legal representatives.

Patients/consultants who are citizens of European Union countries and residing in European Union countries may give their consent to the processing of their personal data in person, provided that they are at least 16 years old or at the age limit stipulated in their country. Consents of patients/consultants under this age must be given by their legal representatives.

11) WITHDRAWAL OF CONSENT

In case you give consent to HYGIA MED regarding the processing of your Personal Data, we inform you that you can withdraw your consent at any time for the purposes stated above in accordance with 6/1/a and KVKK 5/1. Your consent will be withdrawn if you send your declaration of withdrawal of your consent to our contact address stated below as stated below.

12) RIGHTS OF DATA SUBJECTS

As a Data Subject, your Personal Data is also protected in accordance with The rights of Data Subjects (citizens of the European Union or residents of European Union countries) where they fall within the jurisdiction of

- **Right of Access (Article 15):** The data subject has the right to confirm whether personal data relating to him/her is being processed by applying to HYGIA MED, and if personal data is processed, to learn the details in Article 15.
- **Right to Correction (Article 16):** The Data Owner has the right to have his/her personal data, which are in the possession of MEDİTRİNA TOURISM CONSTRUCTION CONSULTANCY HEALTH CONSULTANCY INDUSTRY AND TRADE LIMITED COMPANY and which belong to him/her, corrected by applying at any time.
- **Right to Delete (article 17):** The Data Owner has the right to request the deletion of personal data held by MEDİTRİNA TOURISM CONSTRUCTION CONSULTANCY HEALTH CONSULTANCY INDUSTRY AND TRADE LIMITED COMPANY. If the issues specified in Article 17 occur, your personal data will be deleted by MEDİTRİNA TOURISM CONSTRUCTION CONSULTANCY HEALTH CONSULTANCY INDUSTRY AND TRADE LIMITED COMPANY without delay.
- **Right to Restriction of Processing (Article 18):** In the event that Data Owners object to the up-to-dateness of their Personal Data, Data Owners have the right to request the restriction of the use of their data until the accuracy of the Personal Data is confirmed by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ. In cases where the Data Owner requests the deletion of Personal Data due to the illegality of the Personal Data processing activity, the Data Owner has the right to request the restriction of the use of the data until the request is fulfilled. The Data Subject has the right to request restriction of the use of his/her data in cases where HYGIA MED no longer needs his/her personal data for the purpose of processing. In cases where Data Subjects object to the processing pursuant to Article 21/1, they have the right to request the restriction of the use of their data until it is verified whether HYGIA MED's legitimate reasons for processing outweigh the legitimate reasons of the Data Subject.
- **Right to Data Portability (Article 20):** If it is technically possible, the Data Owner has the right to request the transfer of his/her Personal Data held by MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ to another controller by applying at any time. However, this right can be used when data processing is based on consent or when required by the contract.
- **Right of Objection (Article 21):** The Data Subject shall have the right to object to the processing of personal data, including profiling under subparagraphs (e) or (f) of Article 6(1), on grounds relating to his or her particular situation. HYGIA MED may not process personal data unless it can demonstrate a strong legitimate ground, such as the establishment, exercise or protection of a legal right or overriding the interests, rights and freedoms of the Data Subject.

Where the Data Subject's Personal Data is processed for direct marketing purposes, the Data Subject has the right to object at any time to the processing of his/her personal data for this purpose, including profiling to the extent that it is related to such direct marketing. If the Data Subject objects to the processing of Personal Data for direct marketing purposes, the Personal Data will no longer be processed for such purposes.

13) RIGHTS OF DATA SUBJECTS PURSUANT TO KVKK

The rights of natural persons whose personal data are processed in accordance with Article 11 of the KVKK are as follows;

- To learn whether his/her personal data is processed or not,
- Request information if personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- Although it has been processed in accordance with the provisions of the KVKK and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To object to the emergence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

In case there are rights or requests that you want to use among your rights listed above; You can submit your written application, in which you clearly and clearly state which of the rights specified in Article 11 of the KVKK and the articles regarding the rights of the data owner in the KVKK, together with the documents that will prove your identity, with wet signature and documents to prove your identity, to the address of HYGIA MED, which is also available on the corporate websites, "Mecidiye Mah. Ambarlıdereyolu Sk. No:15/4 Beşiktaş/İSTANBUL" address of HYGIA MED, which is also available on their corporate website, or you can send it through a notary public, or you can send it to the e-mail address "info@hygiamedturkey.com" by signing it with a secure e-signature, or you can send it by other methods specified in the KVKK. In accordance with the "Communiqué on the Procedures and Principles of Application to the Data Controller", it is mandatory to include name-surname, signature, Turkish ID Number/Passport Number/temporary Turkish ID Number, residence or workplace address, e-mail address, telephone and fax number, and the subject of the request in your applications.

HYGIA MED will finalise the request free of charge as soon as possible and within thirty (30) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board will be charged.

You can submit your applications to HYGIA MED via the **"KVKK Access / Information Request Form"** in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller.

14) CONSENT and APPROVAL

By reading and accepting this Clarification Text, you are fully and completely informed about the data processing process carried out by HYGIA MED, that you have learned your rights governed by the KVKK and that your Personal Data and Special Personal Data are transferred to MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ within the scope of this Clarification Text. You are deemed to have accepted, declared and undertaken that you consent to the processing by VE TİCARET LİMİTED ŞİRKETİ with your free and free will.

You have the right to refuse to accept the Information Text after reading it.

MEDİTRİNA TURİZM İNŞAAT SAĞLIK DANIŞMANLIK SANAYİ VE TİCARET LİMİTED ŞİRKETİ reports as "DATA RESPONSIBLE" within the scope of KVKK.

Regards.