

**PRIVATE ANATOLIA HOSPITAL
PERSONAL DATA PROTECTION AND PROCESSING POLICY**

Effective Date : 6 April 2018

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1. GENERAL INFORMATION

With the awareness of the importance of the confidentiality and security of your personal data obtained within the scope of the Personal Data Protection Law No. 6698 (KVKK) and other relevant legislation, Kemer Medical Center Özel Sađ. Hiz. Tur. Tic. ve A.Ş. (Private Anatolia Hospital) aims to fulfil the requirements for compliance with the KVKK as the data controller described in the law and to establish a data protection and processing policy in international standards. Private Anatolia Hospital Personal Data Protection Policy ("Policy") sets forth the principles of lawfulness, honesty and openness adopted by Private Anatolia Hospital in the protection and processing of personal data. The Policy also provides information on the purposes for which Private Anatolia Hospital processes personal data, the method, legal reason and purpose of collecting personal data, to whom and for what purposes the data can be transferred, and the rights and remedies of those concerned.

2. DEFINITIONS

2.1. Personal Data

It refers to any information relating to an identified or identifiable natural person. For example; name, surname, Turkish ID number, e-mail, address, date of birth, bank account number, etc. Therefore, the processing of information about legal entities is not covered by the KVKK.

2.2. Sensitive Data of Special Nature

It refers to the data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive data of special nature.

2.3. Data Subject

Refers to the natural person whose personal data is processed. For example; patients, customers, suppliers, employees, visitors may be data subjects.

2.4. Data Controller

It refers to the person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data recording system).

2.5. Data Processor

It refers to the natural or legal person who processes personal data on behalf of the data controller based on the authorisation granted by the data controller.

2.6. Anonymization

It is the modification of personal data in such a way that it loses its personal data characteristic and this situation cannot be reversed. In this case, the anonymised data cannot be found by matching it with another data.

2.7. Processing of Personal Data

It refers to all kinds of operations performed on personal data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.

3. BASIC PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

Private Anatolia Hospital meets the general principles and conditions specified in the legislation regarding the protection and processing of personal data and acts in accordance with the principles listed below in order to ensure that personal data is processed in accordance with the Constitution and KVKK.

3.1. Prohibition of Processing Personal Data by rule

Private Anatolia Hospital, being aware that the processing of personal data is prohibited as a rule, processes it only within the limits stipulated by the legislation, based on the following reasons:

3.1.1. Explicit Consent of the Personal Data Owner

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and free will. The data shall be processed within the scope of the explicit consent of the data subject and for the purposes specified in the explicit consent. As a rule, in the presence of the other conditions below, it is not necessary to obtain the explicit consent of the data subject.

3.1.2. Explicitly Stipulated by Laws

The personal data of the data subject shall be processed in accordance with the law if it is explicitly stipulated in the law. In cases where data processing is permitted by law, data is processed limited to the reasons and data categories specified in the relevant law.

3.1.3. Failure to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be validated, to protect the life or physical integrity of himself/herself or another person.

3.1.4. Direct Relevance to the Establishment or Performance of the Contract

Provided that it is directly related to the conclusion or performance of a contract, personal data may be processed if it is necessary to process personal data of the parties to the contract (provided that the person whose data will be processed based on the conclusion or performance of the contract is one of the parties to the contract).

3.1.5. Fulfilment of Legal Obligation

In cases where data processing is mandatory for Private Anatolia Hospital to fulfil its legal obligations, it may process the personal data of the data subject.

3.1.6. Anonymization of Personal Data by the Data Subject

In the event that the personal data of the data owner is made public by him/her, the relevant personal data may be processed limited to the purpose of anonymization.

3.1.7. Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data subject may be processed.

3.1.8. Data Processing is Mandatory Due to Legitimate Interests

Provided that the fundamental rights and freedoms of the data subject are not damaged, the personal data of the data subject may be processed if data processing is mandatory for the legitimate interests of Private Anatolia Hospital. In case the processed data is personal data of special nature as defined in the KVKK and if there is no explicit consent of the data subject, personal data can only be processed in the following cases, provided that adequate measures to be determined by the KVK Board are taken:

3.2. Compliance with Law and Good Faith

Pursuant to Article 4 of the KVKK, Private Anatolia Hospital processes personal data in accordance with the law and the good faith, and aims to balance conflicting interests by observing "justified interest". Information is based on openness and honesty, clear information is given about the purpose of use of the personal data collected and the data is processed within this framework.

3.3. Purposefulness, Limitation and Proportionality

Private Anatolia Hospital determines the purposes for which it will process the data of the data subject in line with his/her explicit consent. In this context, it avoids processing personal data that is not related to the purpose of processing or is not needed, and the data required during data processing activities are collected at a minimum level.

3.4. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

Private Anatolia Hospital ensures that the personal data it processes is accurate, relies on the declarations of the person concerned for this purpose and receives confirmation of its currency when necessary.

3.5. Processing of Personal Data for Specific, Explicit and Legitimate Purposes

Private Anatolia Hospital collects and processes personal data for legitimate and lawful reasons. Private Anatolia Hospital processes personal data in connection with the activities they carry out, within a reasonable framework and to the extent necessary, and retains them for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

3.6. Data Security Principle

With the awareness of the speed of development of technology, Private Anatolia Hospital is aware that the security of your data is not limited to legal methods and that technology-supported methods are also essential. In this context, it tries to take all necessary measures to ensure data security

4. METHOD OF COLLECTING PERSONAL DATA

The personal data processed may vary according to the type and nature of our services. We may collect your personal data verbally, in writing or electronically by automatic or non-automatic methods and similar means. Your personal data collected for this legal reason may be processed and transferred within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK to provide you with better service. In addition, your personal data may also be processed when you physically visit Private Anatolia Hospital buildings, branches and centres or use call centres, visit websites and/or social and digital media or participate in activities such as events, seminars, organisations, trainings organised by Private Anatolia Hospital to benefit from our products and services.

5. PURPOSES AND PROCEDURE FOR PROCESSING PERSONAL DATA

Your personal data may be processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK and if you have accepted the **Permitted User Database Registration and Electronic Commercial Message Consent Text**, it is used by our business units to carry out the necessary work to benefit the relevant persons from the products and services offered by Private Anatolia Hospital and to carry out the relevant business processes, to purchase services and / or Services and to plan and execute sales processes, to plan and execute operation processes, to plan and / or execute after-service support services activities, to manage relations with business partners and / or suppliers, to ensure that the data is accurate and up-to-date and ensure continuity in the provision of the services offered, to create and follow-up visitor records and to ensure legal, technical and commercial-business security of the Private Anatolia Hospital and related persons who have a business relationship with Private Anatolia Hospital, to execute transactions and works related to the services provided to you, to perform contractual obligations, to follow-up service quality, etc.; to keep human resources, financial and accounting records within the scope of campaigns, promotions and similar marketing activities of Private Anatolia Hospital and its Business Partners and within the scope of the obligation to regularly inform the Information Technologies Communication Authority to fulfil the obligations before all kinds of legal authorities in order to protect the legal rights of Private Anatolia Hospital and the obligation to notify the relevant Public Institutions and Organisations, Notary Public, Courts and Prosecutors' Offices.

6. TRANSFER OF PERSONAL DATA

Your personal data may be transferred to our affiliates, shareholders, legally authorised public institutions and organisations, suppliers and business partners, service recipients or other third parties and/or abroad within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK to fulfil the purposes specified in this Policy.

7. RIGHTS OF THE DATA SUBJECT

Within the scope of Article 11 of the KVKK, everyone has the right to apply to Private Anatolia Hospital in the capacity of data controller in the following matters:

- 7.1. To learn whether personal data is processed or not,
- 7.2. To request information if personal data has been processed,

- 7.3. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- 7.4. To know the third parties to whom personal data are transferred domestically or internationally,
- 7.5. To request correction of personal data in case of incomplete or inaccurate,
- 7.6. To request the deletion or destruction of personal data ex officio or upon the request of the person concerned in the event that the reasons requiring its processing disappear, in accordance with Article 7 of the KVKK No. 6698, although it has been processed in accordance with the provisions of this Law and other relevant laws,
- 7.7. To request notification of the transactions made in accordance with the subparagraphs within the scope of Articles 5 and 6 of the KVKK to third parties to whom personal data are transferred,
- 7.8. To object to the occurrence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,
- 7.9. To demand compensation for the damage in case of damage due to unlawful processing of personal data.

8. METHOD OF EXERCISING THE RIGHTS OF THE DATA SUBJECT

- 8.1. The personal data owner "Relevant Person" will be able to notify Private Anatolia Hospital of his/her rights and requests stated in subparagraph D. In this context, the relevant person to use all other rights he/she has in accordance with Article 11 of KVKK No. 6698,
- 8.2. By applying in person,
- 8.3. By post with signature declaration attached,
- 8.4. Through a notary public,
- 8.5. The applicant can apply by signing with a secure electronic signature of the applicant and sending it to the e-mail address specified below, proving his identity.

9. ENFORCEMENT AND IMPLEMENTATION

This Policy entered into force on 6.4.2018. In the event that all or certain articles of the Policy are updated, the updates policy enter into force on the date of publication. The Policy is published in its most up-to-date form on <http://anatoliahospital.com / kisisel-verilerin-korunmasi />.