

DAVIVA DİYALİZ HİZMETLERİ ANONİM ŞİRKETİ
NOTIFICATION FOR PROVISION OF HEALTHCARE SERVICES

1. Data Controller

Your personal data is processed by Daviva Diyaliz Hizmetleri Anonim Şirketi (“**Clinic**”), registered with the Istanbul Trade Registry Office with the registration number 713263 and with its head office at Ayazağa Mah. Kemerburgaz Cad. D Apt. No: 10 D/24 Sarıyer / Istanbul, acting as the data controller, in accordance with the Law No. 6698 on Personal Data Protection (“**LPDP**”) and within the framework of this Notification for the Provision of Healthcare Services (“**Notification**”).

Our clinic adopts the principle of “maintaining patient privacy” while providing healthcare services and respects the privacy and personal data protection rights of both our patients and their relatives. In this context, our clinic processes your personal data in accordance with all legislation regarding the protection of personal data, especially including LPDP, and takes all necessary security measures to ensure the security of your data. This Notification explains the scope of processing of your personal data collected as part of the healthcare services provided and the clinic management activities conducted by our clinic.

2. Methods of Collecting Your Personal Data

Your personal data are collected by our Clinic, in whole or in part, by automated or non-automated methods, provided that it is part of any data recording system, from electronic and/or physical environments, primarily through <https://www.daviva.com.tr/>, our Clinic's websites, printed forms, call center line, telephone, fax, mail/cargo, e-mail, tablet/handheld terminal, SMS, request/complaint/suggestion platforms, contracted laboratories and imaging centers, our Clinic's headquarters and registration desks, Clinic integrated systems including the Clinical information management system, and integrated systems with authorized public institutions and private organizations, and other methods (channels) that may be added to these in the future.

3. Your Personal Data Categories and Purposes and Legal Reasons for Processing Your Personal Data

A. In terms of Processing the Personal Data of Patients

Your personal data categories processed as part of the patient registration and identity verification management; appointment creation, change and cancellation management; outpatient/daytime treatment and session management of dialysis patients; creation of reports after dialysis treatment sessions; home dialysis treatment and session management; laboratory and analysis management, including healthcare activities conducted through contracted external laboratories; patient rights and information management; patient/patient’s relative training management; management of promotional and information activities in healthcare services; planning and management of clinic internal operations; management of consultation activities; patient/ambulance dispatch, transfer and transport management; monitoring and management of patient/companion nutrition and dietetic services; management of provision, payment, collection and reconciliation transactions with contracted payer institutions and organizations for domestic and/or international holiday patients; management of advance, payment, collection and reconciliation transactions with SGK for patients under the scope of SGK; planning and management of healthcare services and financing; management of finance and accounting works (e.g. invoicing /cancellation, payment/collection management, budget and reporting management); inquiry / complaint / suggestion management; calibration, maintenance and failure management of medical and dialysis devices; software development and test management; information security management; remote treatment management of home dialysis

patients; employee and patient safety management; public health protection management; communication management with intermediary institutions (e.g. assistance companies, insurance agencies); management of patient transportation service processes; management of invoice / collection / reconciliation transactions for physicians; pricing, feasibility and norm staff management; management of improvement and development of healthcare services / processes; administrative affairs and correspondence management (e.g. incoming - outgoing document management); quality standards management, including implementation of Quality Standards in Healthcare; mandatory legal notification / communication management (e.g. infection, contagious disease, antibiotic use, white code notifications); accreditation management; audit / internal audit and reporting management; review and abuse management; ethical report management; management of legal and consulting services, including fulfillment of legal obligations and conduct of dispute resolution procedure (e.g. litigation, enforcement, mediation) to which the Clinic is a party and/or associated; communication, audit and reporting management and storage and archive management processes within the scope of compliance with the policies and procedures of our group companies and the purposes and legal reasons for processing and transferring your personal data are explained in detail below.

Personal Data Category	Purposes and Legal Reasons for Processing Personal Data
Identification Data	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (b) thereof where it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid, pursuant to subparagraph (c) thereof, where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting Access Authorizations • Conducting the Activities as per Legislation • Conducting Finance &Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities

	<ul style="list-style-type: none"> • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Goods / Services Procurement Processes • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes • Conducting Customer Satisfaction Activities • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Conducting Strategic Planning Activities • Inquiry / Complaint Follow up • Conducting the Supply Chain Management Processes • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations • Conducting the Management Activities
<p>Communication Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (c) thereof, where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting Access Authorizations • Conducting the Activities as per Legislation • Conducting Finance &Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities

	<ul style="list-style-type: none"> • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Goods / Services Procurement Processes • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes • Conducting Customer Satisfaction Activities • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Conducting Strategic Planning Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations
<p>Professional Experience Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (c) of Article 5(2) of the LPDP where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting the Activities as per Legislation • Conducting Finance &Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes

	<ul style="list-style-type: none"> • Conducting Customer Satisfaction Activities • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Conducting Strategic Planning Activities • Inquiry / Complaint Follow up • Informing Authorized Persons, Institutions and Organizations • Conducting the Management Activities
<p>Customer (Patient) Transaction Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (b) thereof where it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid, pursuant to subparagraph (c) thereof, where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting Access Authorizations • Conducting the Activities as per Legislation • Conducting Finance &Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Goods / Services Procurement Processes • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes

	<ul style="list-style-type: none"> • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes • Conducting Customer Satisfaction Activities • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Conducting Strategic Planning Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations • Conducting the Management Activities
<p>Finance Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (c) of Article 5(2) of the LPDP where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Conducting Finance &Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting / Auditing Business Activities • Conducting Goods / Services Sales Processes • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Inquiry / Complaint Follow up • Informing Authorized Persons, Institutions and Organizations
<p>Inquiry / Complaint / Suggestion Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (c) of Article 5(2) of the LPDP where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right</p>

	<p>or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Conducting Processes for Loyalty to Firm / Goods / Services • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes • Conducting Customer Satisfaction Activities • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Inquiry / Complaint Follow up • Informing Authorized Persons, Institutions and Organizations
<p>Transaction Security Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (c) thereof, where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting Access Authorizations • Conducting the Activities as per Legislation • Follow up and Execution of Legal Procedures

	<ul style="list-style-type: none"> • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes • Creating and following up the appointments • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations
Legal Transaction Data	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (c) thereof, where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting / Auditing Business Activities • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Inquiry / Complaint Follow up • Informing Authorized Persons, Institutions and Organizations
Audio-Visual Data	<p>Your personal data of this category are processed as part of the management of promotion and information activities in healthcare industry, in case there is explicit consent in accordance with the first paragraph of Article 5 of the PDPL for processing personal data</p>

	<p>subject to explicit consent (legal ground) and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting Processes for Loyalty to Firm / Goods / Services • Conducting / Auditing Business Activities • Conducting Goods / Services Production and Operational Processes • Conducting Promotional and Information Activities in Healthcare Services • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up
<p>Special Categories of Personal Data (Health Data)</p>	<p>Your personal data of this category are processed pursuant to subparagraph (b) of Article 6(3) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (c) thereof, where it is mandatory for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid, pursuant to subparagraph (d) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right, pursuant to subparagraph (e) where it is processed by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing and pursuant to subparagraph (f) thereof where it is compulsory in order to fulfil legal obligations in the fields of employment, occupational health and safety, social security, social services and social aid (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting the Activities as per Legislation • Conducting Finance &Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Goods / Services Procurement Processes • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Conducting the Customer Relations Management Processes

	<ul style="list-style-type: none"> • Conducting Customer Satisfaction Activities • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Conducting Contractual Processes • Conducting Strategic Planning Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations <p>Your health data identified as the special categories of personal data are processed as part of the management of promotion and information activities in healthcare industry, in case there is explicit consent in accordance with subparagraph (a) the third paragraph of Article 6 of the LPDP for processing personal data subject to explicit consent (legal ground) and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting Processes for Loyalty to Firm / Goods / Services • Conducting / Auditing Business Activities • Conducting Goods / Services Production and Operational Processes • Conducting Promotional and Information Activities in Healthcare Services • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up <p>***Important Note: In accordance with the exceptional cases where the LPDP will not be applied, as regulated in Article 28 of the LPDP, the processing of your special personal data and its transfer within this scope are not subject to the legal requirement for obtaining explicit consent.</p>
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B. Processing of Personal Data of Patient’s Family Members, Relatives, Companions and Paying Persons Other Than the Patient

Your personal data categories processed as part of the patient registration and identity verification management; appointment creation, change and cancellation management; outpatient/daytime treatment and session management of dialysis patients; home dialysis treatment and session management; laboratory and analysis management, including healthcare activities conducted through contracted external laboratories; patient/patient’s relative training management; management of promotional and information activities in healthcare services; planning and management of clinic internal operations; patient/ambulance dispatch, transfer and transport management; management of provision, payment, collection and reconciliation transactions with contracted payer institutions and organizations for domestic and/or international holiday patients; planning and management of healthcare services and financing; management of finance and accounting works (e.g. invoicing /cancellation, payment/collection management, budget and reporting management); inquiry / complaint / suggestion management; calibration, maintenance and failure management of medical and dialysis devices; information security management; remote treatment management of home dialysis patients; public health protection management; communication management with intermediary institutions (e.g. assistance companies, insurance agencies); management of patient transportation service processes; administrative affairs and correspondence management (e.g.

incoming - outgoing document management); quality standards management, including implementation of Quality Standards in Healthcare; mandatory legal notification / communication management (e.g. infection, contagious disease, antibiotic use, white code notifications); audit / internal audit and reporting management; review and abuse management; ethical report management; management of legal and consulting services, including fulfillment of legal obligations and conduct of dispute resolution procedure (e.g. litigation, enforcement, mediation) to which the Clinic is a party and/or associated; communication, audit and reporting management and storage and archive management processes within the scope of compliance with the policies and procedures of our group companies and the purposes and legal reasons for processing and transferring your personal data are explained in detail below.

Personal Data Category	Purposes and Legal Reasons for Processing Personal Data
Identification Data	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform a legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting the Activities as per Legislation • Conducting Finance & Accounting Activities • Conducting Processes for Loyalty to Firm / Goods / Services • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations

<p>Communication Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (ç) of Article 5(2) of the LPDP where it is compulsory for the data controller to perform a legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting Training Activities • Conducting the Activities as per Legislation • Conducting Finance & Accounting Activities • Conducting Processes for Loyalty to Firm / Goods / Services • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations
<p>Finance Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (ç) of Article 5(2) of the LPDP where it is compulsory for the data controller to perform a legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p>

	<ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Conducting Finance & Accounting Activities • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting / Auditing Business Activities • Conducting Goods / Services Sales Processes • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Informing Authorized Persons, Institutions and Organizations
<p>Inquiry / Complaint / Suggestion Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (c) of Article 5(2) of the LPDP where it is compulsory for the data controller to perform a legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Conducting Processes for Loyalty to Firm / Goods / Services • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Informing Authorized Persons, Institutions and Organizations
<p>Transaction Security Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (c) thereof, where the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform its legal</p>

	<p>obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting Information Security Processes • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Conducting Processes for Loyalty to Firm / Goods / Services • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting the Communication Activities • Conducting / Auditing Business Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Support Services after Sales of Goods / Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operational Processes • Creating and following up the appointments • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations
<p>Legal Transaction Data</p>	<p>Your personal data of this category are processed pursuant to subparagraph (a) of Article 5(2) of the LPDP where it is expressly provided for by the laws; pursuant to subparagraph (ç) thereof, where it is compulsory for the data controller to perform a legal obligation; pursuant to subparagraph (e) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right or pursuant to subparagraph (f) thereof, where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Follow up and Execution of Legal Procedures • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting / Auditing Business Activities

	<ul style="list-style-type: none"> • Conducting Business Continuity Activities • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations • Informing Authorized Persons, Institutions and Organizations
Audio-Visual Data	<p>Your personal data of this category are processed as part of the management of promotion and information activities in healthcare industry, in case there is explicit consent in accordance with the first paragraph of Article 5 of the PDPL for processing personal data subject to explicit consent (legal ground) and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting Processes for Loyalty to Firm / Goods / Services • Conducting / Auditing Business Activities • Conducting Goods / Services Production and Operational Processes • Conducting Promotional and Information Activities in Healthcare Services • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up
Special Categories of Personal Data (Health Data)	<p>Your personal data of this category are processed pursuant to subparagraph (b) of Article 6(3) of the LPDP where it is expressly provided for by the laws, pursuant to subparagraph (d) thereof, where the data processing is compulsory for the establishment, exercise or protection of any right, pursuant to subparagraph (e) where it is processed by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing and pursuant to subparagraph (f) thereof where it is compulsory in order to fulfil legal obligations in the fields of employment, occupational health and safety, social security, social services and social aid (legal grounds) and the following purposes:</p> <ul style="list-style-type: none"> • Conducting the Emergency Management Processes • Conducting the Audit / Ethics Activities • Conducting the Activities as per Legislation • Conducting the Internal Audit / Investigation / Intelligence Activities • Conducting / Auditing Business Activities • Conducting Occupational Safety and Health Activities • Conducting Goods / Services Sales Processes • Healthcare Services Financing Planning and Management • Conducting Retention and Archive Activities • Inquiry / Complaint Follow up • Ensuring the Security for Data Controller Operations

	<ul style="list-style-type: none"> • Informing Authorized Persons, Institutions and Organizations
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4. Transfer of Personal Data to Third Parties Domiciled at Home and/or Abroad

Within our clinic, your personal data can only be accessed by our employees who have limited authorized access for the purposes detailed above, to the extent necessary to perform their duties, and your personal data is not transferred to third parties located in the country and/or abroad, unless the conditions for transfer stipulated in Articles 8 and/or 9 of the LPDP are satisfied. However, your personal data processed within the scope of each personal data category specified above may be transferred to the following recipient groups in accordance with Articles 8 and/or 9 of the LPDP and if the personal data processing conditions (legal reasons) specified above for the relevant data category are also satisfied for the purposes of such transfer:

- Your personal data limited to the categories of identity, communication, professional experience, audio-visual, finance, legal transactions, transaction security, inquiry / complaint / suggestion and customer (patient) transactions and special categories of health data, primarily for the purpose of providing products and/or services in terms of carrying out clinical activities, can be transferred to our **suppliers**, including our group companies that act as service providers located in Turkey and/or abroad for the purposes specified in the relevant category for each data category above (*e.g. social security, occupational health and safety and legal advisors, audit firms, information technologies and data hosting service providers*),
- your personal data limited to the categories of identity, communication, professional experience, audio-visual, finance, legal transactions, customer (patient) transaction, finance categories of personal data and special categories of health data, primarily for the purpose of planning and managing finance and accounting works related to health services and insurance transactions can be transferred for the purposes specified in the relevant category above for each data category to the **contracted payer institutions** established at home and/or abroad (*for example, private health insurance companies*),
- your personal data limited to the categories of identity, finance and customer (patient) transaction personal data, primarily for the purpose of conducting payment and collection activities related to the services provided by our Clinic can be transferred for the purposes specified in the relevant category above for each data category to the **banks** established at home and/or abroad,
- Your personal data limited to the categories of identity, communication, professional experience, customer (patient) transaction, audio-visual, inquiry / complaint / suggestion and legal transaction and special categories of health data primarily for the purpose of informing about the patient's health condition and accompanying the patient, receiving and delivering the patient's personal belongings / medicines and carrying out payment transactions can be transferred in accordance with the provisions of relevant legislation, primarily LPDP, Patient Rights Regulation, Personal Health Data Regulation, in case of medical necessity, court decision or permission of the patient / legal heirs, **to the patient family members and relatives, companions, legal representatives including guardians, trustees and representatives and other third parties permitted by the patient domiciled at home and/or abroad** for the purposes specified in the relevant category for each data category above
- your personal data limited to the categories of identity, communication, professional experience, audio-visual, finance, legal transactions, customer (patient) transaction, finance categories of personal data and special categories of health data, primarily for the purpose of treatment and session management and finance planning and management related to health services can be transferred for the purposes specified in the relevant category above for each data category to **the institutions dispatching / transporting the patients, other health institutions, physicians working**

under a medical service procurement contract as domiciled at home and/or abroad in accordance with Article 6(3) of the LPDP,

- Your personal data limited to the categories of identity, communication, finance, legal transactions, transaction security, inquiry / complaint / suggestion and customer (patient) transactions and special categories of health data, primarily for the purpose of conducting the legal and financial due diligence activities of our Clinic in case of possible mergers, acquisitions, joint ventures, divisions and other structural changes can be transferred for the purposes specified in the relevant category for each data category above, to the ***potential buyers, sellers or other parties to whom the transaction is addressed and their employees, consultants and database service providers involved in the relevant process, who are under the obligation of confidentiality***, resident at home and/or abroad; and
- Your personal data limited to the categories of identity, communication, professional experience, audio-visual, finance, legal transactions, transaction security, inquiry / complaint / suggestion and customer (patient) transactions and special categories of health data, primarily for the purpose of fulfilling the legal obligations and following up the legal proceedings of our Clinic can be transferred for the purposes specified in the relevant category for each data category above to the authorized public institutions and organizations resident at home and/or abroad (*e.g. Ministry of Health of the Republic of Turkiye, Ministry of Health of the Republic of Turkey, Social Security Institution, courts and enforcement offices*).

5. Duration for Collecting Your Personal Data

Your personal data obtained as part of our clinical activities are stored and destroyed in accordance with the general principles and regulations specified in our Clinic's policies and procedures regarding storage and destruction, which are prepared in accordance with the provisions of the Constitution, LDPD, Regulation on Deletion, Destruction or Anonymization of Personal Data and other relevant legislation.

In this context, your personal data will be destroyed if all of the above-mentioned personal data processing conditions are no more in force. Accordingly, your personal data will continue to be processed for the legal prescription periods following the termination of your relationship with our Clinic. Your personal data processed based on the explicit consent personal data processing requirement will be destroyed during the first destruction period if you withdraw your explicit consent. We kindly request you to review Section 6 of this Notification regarding your requests for the destruction of your personal data.

6. Your Rights under the LPDP

Please note that you have the rights in accordance with article 11 of PDPL:

- learn whether or not your personal data has been processed;
- to ask for information if your personal data has been processed;
- to learn the purpose of processing the personal data and if such personal data has been used in accordance with the intended purpose;
- to know the local or overseas data importers to which your personal data has been transferred;
- to ask for rectification or correction if your personal data has been processed wrongly or insufficiently and ask that such rectification or correction be notified to the third persons to whom personal data have been transferred,
- in case where the reasons requiring the processing of personal data are no more existing even if the personal data has been processed in accordance with the PDPL and other applicable laws, then to ask for deletion or destruction of your personal data and, where your personal

data are processed deficiently or wrongly, ask that such deletion or destruction be notified to the third persons to whom personal data have been transferred,

- to challenge the raising of a prejudicing effect caused by analysis of personal data exclusively by means of automated systems; and
- to claim damages if the data subject you suffers losses due to the unlawful processing of your personal data.

You can submit your applications regarding your rights specified above in accordance with the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller (in writing or electronically via registered electronic mail (REM) address, secure electronic signature, mobile signature or your e-mail address that you have previously notified to our Clinic and registered in our systems, together with information / documents verifying your identity so that our Clinic can determine that you are the true right holder (e.g. Turkish Republic identity number or passport number for citizens of other countries, residence address / workplace address for notification, mobile phone / telephone / fax number, e-mail address)) by filling out the Related Person Application Form that you can access from the link address [*please add the link address through which the Related Person Application Form can be accessed*] or through other channels specified in the Related Person Application Form of the data controller in accordance with the procedures and principles explained above and regulated in the relevant legislation. Your applications will be finalized free of charge as soon as possible and within 30 (*thirty*) days at the latest, depending on the nature of your request; however, if the transaction involves an additional cost, you may be charged a fee according to the tariff determined by the Personal Data Protection Board.

* We would like to remind you that no special categories of personal data (e.g. religious information or blood group data) should be included in the documents in question.

I have read and understood the foregoing Notification.