

UDENTO ORAL AND DENTAL HEALTH SERVICES

LTD. ŞTİ

PERSONAL DATA

STORAGE AND DISPOSAL POLICY

1. PURPOSE

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, this Personal Data Retention and Destruction Protection of Personal Data No. 6698 with the Policy ("Retention and Disposal Policy")

Technical and administrative protection of personal data in accordance with the Law ("Law")

Deletion of Personal Data published in the Official Gazette dated 28/10/2017,

The provisions of the Regulation on the Destruction or Anonymization ("Regulation")

is issued for the purpose of regulating its application.

2. DEFINITIONS

Explicit Consent; Consent on a particular subject, based on information and expressed with free will.

Related User; Person responsible for technical storage, protection and backup of data or within the organization of the data controller or from the data controller, excluding the unit.

Persons who process personal data in line with authorization and instruction.

Destruction; Deletion, destruction or anonymization of personal data.

Law; Law No. 6698 on the Protection of Personal Data.

Recording Environment; Fully or partially automated or part of any data recording system

Any environment where personal data is processed by non-automatic means, provided that

Personal Data; Any information relating to an identified or identifiable natural person.

Anonymization of Personal Data; Personal data, even by matching with other data, making it impossible to be associated with an identified or identifiable natural person by any means.

Personal Data Inventory; Which Data Owner groups does the Personal Data collected within our company belong to?

Inventory showing that it is on a process basis.

Processing of Personal Data; Fully or partially automated or any data

to be obtained, recorded by non-automatic means, provided that it is part of the registration system,

storage, preservation, modification, rearrangement, disclosure, transfer,

take over, make available,

classification or prohibition of use.

Deletion of Personal Data; Personal data cannot be accessed and reused in any way for the relevant users.

rendering it unusable.

Destruction of Personal Data; Personal data cannot be accessed by anyone in any way,

the process of making it non-recoverable and unusable.

Special Quality Personal Data: Race, ethnic origin, political opinion, philosophical belief, religion, sect of the person

or other beliefs, attire, association, foundation or union membership, health, sexual life, punishment

Conviction and security measures, biometric and genetic data

Periodic Destruction: Elimination of all processing conditions of Personal Data in the Law

automatically by our Company at repetitive intervals specified in this Policy.

deletion, destruction or anonymization to be performed.

Policy; Our Company's Personal Data Retention and Disposal Policy.

Data Recording System; We use the Personal Data to be structured and processed within our Company.

registration system(s).

Data Owner; Our Company and/or our Company's affiliates/affiliates have commercial relations

employees, customers, business partners, shareholders, officials, potential customers, prospective employees,

interns, visitors, suppliers, employees of the institutions they work in cooperation with, third parties and

Persons whose personal data is/can be processed like other persons, including but not limited to those listed here.

real person.

Data Controller; data recording system, which determines the purposes and means of processing personal data.

Our Company, which is responsible for its establishment and management.

Regulation; About Deletion, Destruction or Anonymization of Personal Data

Refers to the provisions of the regulation.

3. RECORDING MEDIA WHERE PERSONAL DATA IS STORED

Personal data belonging to data owners, UIDENTO AGIZ VE DIŞ SAĞAĞI HİZMETLERİ LTD. STI

in accordance with the relevant legislation, especially the provisions of the Law, in the environments listed below.

It is securely stored as:

Electronic media:

- Software (Patient Follow-up Program, X-Ray Program, E-Invoice Program, Internet Banking, Ministry of Health, Finance and SGK programs and other software and programs)
- Servers (Backup, E-Mail, Database, Web, File Sharing etc.)
- Video Recorders
- Computers (Desktop, Laptop)
- Mobile Devices (Phone, Tablet, etc.)
- Optical Discs (CD, DVD, etc.)
- Removable Memory (USB, Memory Card etc.)
- Printer, Scanner, Copier

Physical environments:

- Unit Cabinets
- Folders
- Archive

4. EXPLANATIONS RELATING TO REASONS FOR CONSERVATION

General Remarks on Storage

Personal data belonging to data owners, UIDENTO AGIZ VE DIŞ SAĞAĞI HİZMETLERİ LTD. STI

specifically by:

- a. The continuation of the activities,
- b. Fulfillment of legal obligations,

c. Planning and execution of employee rights and fringe benefits,

D. Managing business relations,

In order to secure the above-mentioned physical or electronic media, the Law and other are stored within the limits specified in the relevant legislation.

Legal reasons for retention:

a. Personal data is directly related to the establishment and performance of contracts,

b. Establishment, use or protection of a right of personal data,

c. Provided that personal data do not harm the fundamental rights and freedoms of individuals,
UDENTO

ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ has a legitimate interest,

D. UDENTO AGIZ VE DIŞ SAĞAĞI HİZMETLERİ LTD. STI's any

to fulfill a legal obligation,

to. Explicitly stipulating the storage of personal data in the legislation,

f. Data in terms of storage activities that require the explicit consent of data owners
the express consent of the owners.

Processing Purposes Requiring Storage

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Tracking of Building Entrances and Exits
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Application Processes of Employee Candidates
- Creation of Employee Identity Card
- Creating Employee Personnel File
- Fulfillment of Employment Contract and Legislative Obligations for Employees
- Execution of Benefits and Benefits Processes for Employees
- Issuance of Work Certificate
- Execution of Audit / Ethical Activities
- Execution of Training Activities

- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Invoice Arrangement
- Execution of Finance and Accounting Affairs
- Execution of Company / Product / Services Loyalty Processes
- Ensuring Physical Space Security
- Execution of Assignment Processes
- Service Fee Payment Tracking
- Follow-up and Execution of Legal Affairs
- Carrying out Internal Audit / Investigation / Intelligence Activities
- Execution of Communication Activities
- Execution of Discount Processes
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Salary payments
- Execution of Goods / Services Sales Processes
- Control of Overtime Tracking
- Issuance of Responsible Management Certificate
- Execution of Customer Relationship Management Processes
- Execution of Watch Services
- Personnel Attendance Control System
- Creation of Radiology Records
- Obtaining a Radiology License
- Reminding Appointment Information
- Creation and Tracking of Appointment Records
- Prescription Arrangement
- Execution of Advertising / Campaign / Promotion Processes

- Execution of Risk Management Processes
- Planning/Management of Health Services and Financing
- Delivery and Follow-up of Health Services
- Execution of Storage and Archive Activities
- Execution of Contract Processes
- Follow-up of Requests / Complaints
- Ensuring the Security of Movable Property and Resources
- Execution of the Medical Waste Process
- Execution of Medical Diagnosis/Treatment/Care Services
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Management Activities

Reasons for Destruction

In accordance with the Regulation, the personal data of the data owners in the cases listed below, DENTAL HEALTH SERVICES LTD. It is deleted, destroyed or destroyed by ŞTİ ex officio or upon request.

is made anonymous:

a. The provisions of the relevant legislation, which are the basis for the processing or storage of personal data.

replacement or repeal,

b. The disappearance of the purpose that requires the processing or storage of personal data,

c. Elimination of the conditions requiring the processing of personal data in Articles 5 and 6 of the Law.

getting up.

D. In cases where the processing of personal data takes place only on the basis of express consent, the data subject

withdraw consent,

to. Within the framework of the rights of the person concerned in paragraphs 2 (e) and (f) of Article 11 of the Law,

his application for the deletion, destruction or anonymization of his data.

accepted by the data controller,

f. Deletion, destruction or deletion of personal data of the data controller by the data subject

rejecting the application made to him with the request to be made anonymous,

in cases where it is found insufficient or does not respond within the time stipulated in the Law;

Complaining to the Board and approval of this request by the Board,

g. Despite the expiry of the maximum period for keeping personal data, personal data

the absence of any conditions to justify retaining the data for a longer period of time.

h. Periodic destruction process

5. MEASURES RELATED TO THE PROTECTION OF PERSONAL DATA

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, in accordance with Article 12 of the Law,

to prevent the unlawful processing of the personal data they are processing,

the appropriate level of security to prevent access and data protection.

takes the necessary technical and administrative measures to ensure

or is making. Although all technical and administrative measures have been taken for the personal data processed,

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HEALTH SERVICES LTD. ŞTİ to report this situation to the relevant units as soon as possible.

informs.

4.1 Technical Measures

- Network Security and Application Security Provided
- Information Systems Keeping Up-to-Date
- Authorization matrix has been created for employees
- Encrypted Corporate E-Mail or KEP is Used if Transmission via E-Mail is Required
- Access logs are kept regularly
- The Distribution of Access Authority and Role Is Clearly Defined
- Procedures for Access Authorization and Role Distribution are Established and Implemented
- Accesses are recorded and inappropriate accesses are kept under control.

- Data Masking Precaution is Applied When Necessary
- Authorizations of Employees Who Have Changed Their Positions or Resigned Are Removed
- Current anti-virus systems are used
- Firewalls Are Used
- Security Tests Are Performed Regularly
- A System and a System for Notifying the Related Person and the Board in the Case of Unlawful Processing Detection

Infrastructure is being created

- Security of Physical Environments Containing Personal Data Against External Risks (Fire, Flood Etc.)

Provided

- Personal data is backed up and the security of the backed up personal data is also ensured.
- User Account Management and Authorization Control System is Implemented
- Log records are kept without user intervention.
- Existing risks and threats have been identified
- Policies and Procedures for the Security of Private Personal Data are Determined
- Periodic Authorization Controls Are Performed
- Technical Measures Are Taken Appropriate to Risks
- Disposal Processes in accordance with the Storage and Disposal Policy are Defined and Implemented
- Intrusion Detection and Prevention Systems are Used
- Encryption is in progress
- Data of Special Persons Transferred on Portable Memory, CD, DVD Media are Encrypted

being transferred

- Periodic Inspection of Data Processing Service Providers on Data Security

Provided

- Awareness of Data Processing Service Providers on Data Security is ensured
- Secure encryption for sensitive personal data in the Electronic Environment where the Data is Processed /

cryptographic keys are used and managed by different units

4.2 Administrative Measures

- There are disciplinary regulations for employees that include data security provisions.
- Confidentiality commitments are made
- Obligation to Inform Relevant Persons is Fulfilled
- Extra security measures are taken for personal data transferred via paper and related documents

It is sent in confidential document format.

- Personal Data Security Policies and Procedures Have Been Determined
- Personal Data Is Reduced As Much As Possible
- Unlawful Access to Personal Data is Prevented
- Unlawful Processing of Personal Data is Prevented
- Protection of Personal Data is Provided
- Periodic and Random Inspections are Conducted and Data Security for Employees

Training and awareness activities are carried out periodically.

- Data Security for Employees Involved in the Processing of Special Quality Personal Data

Regular Trainings are Provided on the Subjects

- Security Precautions are Taken for the Environments where Data is Processed and Stored
- Unauthorized Entries and Exits Are Blocked

6. MEASURES TAKEN REGARDING THE DISPOSAL OF PERSONAL DATA

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ in accordance with the provisions of the relevant law

Although it has been processed, in case the reasons that require it to be processed disappear, may delete or destroy personal data on the basis of or at the request of the personal data owner. Personal

After the deletion of the data, the persons concerned will not be able to access the deleted data again in any way, and

will not be used. UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. by personal

An effective data tracking process for defining and monitoring data destruction processes

will be managed. Determining the data to be deleted in the order of the process carried out, identifying the relevant persons,

the access methods of persons will be detected and the data will be deleted immediately afterwards.

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ to destroy, delete or delete personal data

Depending on the medium in which the data is recorded in order to make it anonymous, one of the methods mentioned below is

or can use several:

5.1 Methods for Deletion, Destruction and Anonymization of Personal Data

5.1.1 Deletion of Personal Data

Deletion of personal data means that personal data cannot be accessed in any way for the relevant users and

the process of rendering it unusable. As a method of deletion of personal data, UDENTO AGIZ VE

DENTAL HEALTH SERVICES LTD. ŞTİ can use one or more of the following methods:

ü Personal data in the paper environment can be drawn, painted, cut by blackening method.

or it will be deleted.

ü The user(s) access right(s) for office files in the central file will be removed.

will be removed.

ü Rows or columns containing personal information in databases 'Delete' command

will be deleted with Personal Data stored in the database does not provide any information for the Relevant Users.

from the relevant database in such a way that it cannot be accessed and reused.

is being deleted.

ü Deletion from Digital Document, Personal Data produced or obtained in digital media within the Company

Digital Documents containing the content will not be accessible and reusable in any way for the Relevant Users.

will be permanently deleted.

When necessary, it will be securely deleted with the help of an expert.

5.1.2 Destruction of Personal Data

Destruction of personal data means that personal data cannot be destroyed by anyone with the following methods.

It is the process of making it inaccessible, non-recoverable and unusable.

ü Destruction of Physical Document, being a part of our data recording systems collected by our Company

Personal Data that we process together in non-automatic ways, allowing their subsequent use. can be destroyed by physical destruction.

ü Disposal with Paper Shredder

ü De-magnetizing: Special conditions where magnetic media will be exposed to high magnetic fields.

It is the method of corrupting the data on it in an unreadable way by passing it through the devices.

5.1.3 Anonymization of Personal Data

Anonymization of personal data does not involve any process, even by matching personal data with other data.

that it cannot be associated with an identified or identifiable natural person in any way,

means. UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ to make personal data anonymous

You can use one or more of the following methods to bring

Masking: With data masking, the data set provides the basic identifying information of personal data.

It is a method of anonymizing personal data by removing it from within. Removal of Records: Data containing singularity among the data in the deregistration method

The stored data is made anonymous by removing the line from the records.

Regional Hiding: In the regional hiding method, a single data is barely visible.

Concealing the relevant data, if it has a determining feature due to the combination provides anonymization.

Global Coding: A more general content than the content of personal data with the method of data derivation.

is created and personal data cannot be associated with any person.

is provided. For example; specifying ages instead of date of birth; residence instead of open address the specified region.

Adding Noise: The method of adding noise to the data, especially where numerical data are predominant.

some deviations in the positive or negative direction at the determined rate to the existing data in a data set.

data is made anonymous. For example, a data with weight values

In the group (+/-) 3 kg deviation was used to prevent the real values from being displayed and data is anonymized. The deviation is applied equally to each value.

In accordance with Article 28 of the Law; anonymized personal data research, planning and for statistical purposes. Such processing is outside the scope of the Law, and personal data The explicit consent of the owner will not be sought.

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ personal data deletion, destruction or anonymizing it, and can take a decision according to the category it has chosen.

may freely choose the method to be used. In addition, within the scope of Article 13 of the Regulation

Deletion, destruction or anonymization of the personal data of the person concerned during the application

If he/she chooses one of the categories of

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ will be free.

7. PERSONAL DATA STORAGE AND DISPOSAL TIMES

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, for the purpose for which personal data is processed.

It is stored for the periods specified in Annex-1. Regarding the storage of the personal data in question in the legislation

If a period of time is stipulated, this period shall be complied with. In the absence of a period stipulated in the legislation

personal data for the maximum period for keeping the personal data in the table in Annex-1.

will be stored. These periods are; UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ's data

by evaluating categories and data subject groups; The data obtained as a result of this evaluation

will ensure the fulfillment of the obligations in the laws and, at the maximum, take place in the legislation.

area was determined by considering the time periods.

Due to the expiration of these periods, the obligation to delete, destroy or anonymize arises.

in the event that it is issued, UIDENTO ORAL AND DENT SAGAĞI HIZMETLERI LTD. ŞTİ is the first to follow this date.

deletes, destroys or anonymizes personal data in the periodic destruction process.

All transactions regarding the deletion, destruction and anonymization of personal data are recorded.

and these records are kept for at least three years, excluding other legal obligations.

is stored.

8. PERIODIC DISPOSAL TIMES

In accordance with Article 11 of the regulation, the period of periodic destruction is determined as 6 months. According to this,

Periodic destruction is carried out in June and December every year. In these systems

Documents, files, CDs, floppy disks, hard disks, if any, where the data is recorded, so that the information cannot be retrieved.

It will be deleted from tools such as disk and will not be recycled.

9. STAFF

Within the scope of the law, UIDENTO ORAL AND DENTAL HEALTH SERVICES LTD. STI data officer

in its capacity, based on paragraph 1 of Article 11 of the Regulation, the data retention and destruction process of the Law

the titles, units and duties of the personnel whose obligations will be fulfilled in terms of

definitions are determined by the table in Annex-2 of the Storage and Disposal Policy.

These persons, whose boundaries have been determined, are the Turkish Commercial Code, the Code of Obligations and the Turkish Penal Code.

It is responsible for the transactions and actions that take place within the scope of its authority. Each

department supervisor, the relevant users in the departments within the framework of the Law and Regulation

whether it behaves in accordance with the Storage and Disposal Policy and Personal Data Policy

will be responsible for monitoring. All department heads hereby comply with the specified periodical destruction times.

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HEALTH SERVICES LTD. ŞTİ will report to the Chairman of the Personal Data Protection Committee. It

The decision made in the results of the study for the reports will be put into practice.

10. REVISION AND REVOCATION

If the Storage and Disposal Policy is amended or repealed, a new regulation

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. STI website

(<http://www.udentoconcept.com/>) will be announced.

11. ENFORCEMENT

This Retention and Disposal Policy is effective on the date of publication.

ATTACHMENTS

APPENDIX 1-Data Retention and Disposal Periods

APPENDIX 2-Personal Data Retention, Disposal Personnel Table

APPENDIX1- Data Retention and Disposal Periods

Data Category Retention Period Disposal Period

Identity Transaction date or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Health Transaction date or legal relationship

15 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Family Information Date of transaction or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Criminal Conviction And

Security measures

From the Employee's Resignation

from 10 years

Follow the expiry of the retention period

during the first periodic destruction period

Legal Action From Employee's Resignation

10 years from or Decision

5 years from finalization

Follow the expiry of the retention period

during the first periodic destruction period

Audio-Visual Records Transaction date or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Financial Transaction date or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Patient Transaction Date of operation or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Working Information Date of transaction or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Contact Date of transaction or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Signature Date of transaction or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Transaction Security From Employee Leaving

from 10 years

Follow the expiry of the retention period

during the first periodic destruction period

Attire and Apparel Leaving the Employee

from 10 years

Follow the expiry of the retention period

during the first periodic destruction period

Professional Experience Date of transaction or legal relationship

10 years from expiry

Follow the expiry of the retention period

during the first periodic destruction period

Employee's Resignation

from 10 years

Follow the expiry of the retention period

during the first periodic destruction period

Marketing/Information 2 years Following the expiry of the retention period

during the first periodic destruction period

APPENDIX 2-Personal Data Retention, Disposal Personnel Table

Personnel Duty Responsibility

Personnel Manager Implementation manager

processes within the task

to storage time

with the compliance

periodic destruction time

personal data destruction in accordance with

management of the process

Administrative Affairs Officer

processes within the task

to storage time

with the compliance

periodic destruction time

personal data destruction in accordance with

management of the process