

UDENTO ORAL AND EXTERNAL HEALTH

SERVICES LTD. ŞTI

PROTECTION OF PERSONAL DATA AND

PROCESSING POLICY

Target Audience: Udentto Oral and Dental Health Services Ltd. All the personal data of which are processed by Şti.

real people

Prepared by: Udentto Oral and Dental Health Services Ltd. Ltd. Şti. Protection of Personal Data committee

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Approved by: Udentto Oral and Dental Health Services Ltd. Ltd. has been approved by.

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UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTI

POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

1. INTRODUCTION

Udento Oral and Dental Health Services Ltd. Şti. attaches importance to the protection of personal data in its activities.

and accepts it as one of its priorities in its business and transactions. Udento Oral and Dental Health Services Ltd. Şti Personal Data Protection and Processing Policy ("Policy"), No. 6698

Personal data processing procedures and principles determined by the Personal Data Protection Law ("Law")

Udento Oral and Dental Health Services Ltd. Şti for the harmonization of organization and business processes.

basic arrangement. Udento Oral and Dental Health Services Ltd. Şti this Policy principles

processes and protects personal data with a high level of responsibility awareness,

It provides the necessary transparency by informing the owners.

1.1.Purpose

The purpose of this Policy, the procedures and principles stipulated by the Law and other relevant legislation,

DENTAL HEALTH SERVICES LTD. ŞTİ organization and processes,

ensure its effective implementation. UIDENTO ORAL AND DENTAL HEALTH SERVICES LTD. STI

takes all kinds of administrative and technical measures with this Policy for the processing and protection of personal data,

establishes the necessary internal procedures, raises awareness, provides all necessary trainings to raise awareness.

is doing. In order for shareholders, officials, employees and business partners to comply with the Law processes, necessary

all precautions are taken and appropriate and effective control mechanisms are established.

1.2.Scope

Policy, UIDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ that is automatic in business processes or

obtained by non-automatic means, provided that it is part of any data recording system.

includes personal data.

1.3. Rest

The policy is based on the Law and relevant legislation. Personal data, Medicine and Medicine No. 1219

The Law on the Style of Execution of Arts, No. 3153, Radiology, Radioma and Electrical Treatment And Other Physiotherapy Institutions Law, No. 3359 Health Services Fundamental

Law, Regulation on Private Health Institutions Providing Oral and Dental Health Services, Outpatient Regulation on Private Health Institutions for Diagnosis and Treatment, Population No. 5490

Services Law, Labor Law No. 4857, Occupational Health and Safety Law No. 6331, Social Security Law No. 5510

Insurance and General Health Insurance Law, Income Tax Law No. 193, Personal No. 6698

Data Protection Law, Consumer Protection Law No. 6502, Turkish No. 6102

Laws arising from the Commercial Code, the Tax Procedure Law No. 213 and other relevant legislation

processed to fulfill its obligations.

In case of inconsistency between the current legislation and the Policy, the applicable legislation

is applied. The regulations stipulated by the relevant legislation, the Policy and the UIDENTO ORAL AND TOOTH

HEALTH SERVICES LTD. It is being converted into STI applications

periodic destruction

All of the personal data processing conditions in the Law

storage and destruction of personal data in case of disappearance

ex officio at recurring intervals specified in the policy

deletion, destruction or anonymization

process.

Data Processor

Personally, on behalf of the data controller, based on the authority given

natural and legal person processing data.

Data Recording System

Personal data are processed and structured according to certain criteria.

recording system.

Data subject / Data subject Natural person whose personal data is processed.

data controller

Data that determines the purposes and means of processing personal data

responsible for the establishment and management of the registration system.

natural or legal person.

Data Representative

In accordance with the law, the relevant law articles of the Data Controller

real person appointed to carry out their duties under

person.

regulation

Personal published in the Official Gazette on October 28, 2017

Deletion, Destruction or Anonymization of Data

About Regulation

2. PROTECTION OF PERSONAL DATA

2.1. Ensuring the Security of Personal Data

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, against the law of personal data

to prevent disclosure, access, transmission or other security issues

For this purpose, it takes the necessary measures stipulated in Article 12 of the Law, depending on the nature of the personal data.

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ , Personal Data Protection Authority

To provide the required level of personal data security in accordance with the guidelines published by

takes measures and carries out inspections.

2.2. Protection of Private Personal Data

Personal race, ethnicity, political opinion, philosophical belief, religion, sect or other

beliefs, dress, association, foundation or union membership, health, sexual life, criminal conviction, data on security measures and the protection of biometric and genetic data.

measures are carefully implemented and necessary inspections are carried out.

2.3. Developing Awareness on Protection and Processing of Personal Data

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, your personal data is legal

raising awareness for processing, accessing, data protection and exercising rights

Provides necessary training to the relevant persons.

To increase the awareness of employees about protecting personal data, UDENTO ORAL AND DENTAL HEALTH

SERVICES LTD. ŞTİ creates the necessary business processes and consults consultants if needed.

gets support. Deficiencies encountered in practice and the result of trainings UDENTO ORAL AND Dental

HEALTH SERVICES LTD. It is evaluated by the STI management. These assessments made

In case of need, new trainings are organized depending on the changes in the relevant legislation.

3. PROCESSING OF PERSONAL DATA

3.1. Processing of Personal Data in Compliance with the Legislation

Personal data is processed in accordance with the legislation in line with the principles listed below.

I. Processing in Compliance with Law and Integrity

Personal data, to the extent required by business processes, limited to these, fundamental rights and

It is processed in accordance with the law and honesty without harming their freedoms.

ii. Ensuring Personal Data is Up-to-Date and Accurate

Necessary measures are taken to keep the processed personal data up-to-date and accurate, and the plan and

is being programmed.

iii. Processing for Specific, Explicit, and Legitimate Purposes

Personal data depends on the legitimate purposes determined and disclosed in the business processes carried out.

is processed.

iv. Being Related to the Purpose for which they are Processed, Limited and Measured

Personal data is collected in the quality and extent required by the business processes, and for the determined purposes.

bound, limited processing.

v. Conservation for the Time Required

Personal data, which are required for the purpose of processing personal data and stipulated in the relevant legislation

preserved for a minimum of time. First of all, the storage of personal data in the relevant legislation

If a period is foreseen for this period, if not, for the purpose for which personal data is processed.

maintained for as long as necessary. At the end of the personal data retention periods

in accordance with the periodic destruction periods or the application of the data subject, by appropriate methods.

(deletion, destruction or anonymization) is destroyed.

3.2. Conditions for Processing Personal Data

Personal data is subject to the explicit consent of the owner or one or more of the other conditions stated below.

processed on the basis.

I. Finding the Explicit Consent of the Personal Data Owner

The processing of personal data is done with the explicit consent of the data owner. Explicit consent of the personal data owner:

It takes place by being informed about a certain subject and by taking their free will.

ii. Lack of Explicit Consent of the Personal Data Owner

In case of any of the conditions listed below, the data owner's

Personal data can be processed without the need for consent.

a. Explicit Regulation in Laws

In case there is a clear regulation regarding the processing of personal data in the laws

Personal data may be processed without the consent of the data owner.

b. Failure to Obtain the Explicit Consent of the Person Related to the Cause of Actual Impossibility

Due to de facto impossibility, who are unable to express their consent or whose consent is not valid the life or bodily integrity of the person, himself or another person who cannot be recognized

In order to protect the personal data of the data owner, if it is necessary to process the personal data data can be processed.

c. Direct Concern with the Establishment or Performance of the Contract

Processing personal data, establishing a contract to which the data owner is a party, or

Personal data of the data subject may be processed if it is directly related to its performance.

D. Fulfillment of Legal Obligation

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ legal obligations

personal data of the data subject, if personal data processing is mandatory.

can be processed.

to. Making Personal Data Public by Personal Data Owner

Personal data belonging to data owners who have made their personal data public, for the purpose of making their personal data public.

can be processed on a limited basis.

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

If the data processing is necessary for the establishment, exercise or protection of a right, the data owner

personal data can be processed.

g. Mandatory Data Processing for Legitimate Interest

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, UDENTO

ORAL AND DENTAL HEALTH SERVICES LTD. Data for the legitimate interests of ŞTİ.

In case the processing is mandatory, the personal data of the data subject may be processed.

3.3. Processing of Special Quality Personal Data

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ special quality personal data, Law

and in accordance with the principles set forth in the Policy, with the methods determined by the Board,

It operates with the following procedures and principles by taking technical measures:

i. Special categories of personal data other than health and sexual life are subject to legal processing.

In case of an explicit provision, it can be processed without seeking the explicit consent of the data owner.

In cases not expressly stipulated in the law, the explicit consent of the data owner is obtained.

ii. Special categories of personal data regarding health and sexual life are subject to confidentiality obligation.

by persons or authorized institutions and organizations: protection of public health,

preventive medicine, medical diagnosis, treatment and care services, health

express consent of the data subject for the purpose of planning and managing its services and financing

can be processed without calling. Otherwise, the explicit consent of the data owner is obtained.

3.4. Disclosure of Personal Data Owner

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, personal data owners, which

for which purposes personal data is processed, for what purposes it is shared with whom, by what methods

collected, the legal reason and the rights of the data owners in the processing of their personal data.

issues, in accordance with the relevant legislation. In this regard, the protection of personal data,

Depending on other policy documents and lighting texts prepared within the framework of the principles in the Policy

is being carried out.

3.5. Transfer of Personal Data

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, personal data processing purposes

personal data and sensitive personal data by taking the necessary security measures in line with

may transfer it to third parties in accordance with the law. UDENTO ORAL AND DENTAL HEALTH SERVICES

LTD. ŞTİ carries out the transfer transactions in accordance with the regulations stipulated in Article 8 of the Law.

performs.

I. Transfer of Personal Data

Although the explicit consent of the personal data owner is required for the transfer of personal data,

Based on one or more of the conditions specified, the methods prescribed by the Board are also available.

Personal data may be transferred to third parties by taking all necessary security measures, including

a. clearly stipulated in the law,

b. It is directly related to and necessary for the establishment or performance of a contract,

c. UĐENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŐTİ's legal obligation

mandatory to fulfill

D. Provided that the personal data has been made public by the data subject,

for the limited purpose,

to. UĐENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŐTİ or the data owner or

it is compulsory for the establishment, use or protection of the rights of third parties,

f. Provided that it does not harm the fundamental rights and freedoms of the data owner, UĐENTO AĐUZ VE

DENTAL HEALTH SERVICES LTD. Compulsory for the legitimate interests of ŐTİ.

to be,

g. Those who are unable to express their consent due to actual impossibility or

the life or body of the person or another person whose legal validity is not recognized

necessary to maintain its integrity.

"Adequately Protected Foreigner" determined by the Board as having sufficient protection

For those who have the status of a foreign country declared as a "country", any of the above-mentioned situations.

linked personal data may be transferred. Data in Turkey and foreign countries without adequate protection

"Adequate Protection", which undertakes in writing to an adequate protection of the responsible persons and has the permission of the Board.

Those who are in the status of "Foreign Country where the Data Controller Undertaking the Protection is located,"

Personal data may be transferred in accordance with the conditions stipulated in the legislation.

ii. Transfer of Special Qualified Personal Data

Special categories of personal data, in accordance with the principles set forth in the Policy, to be determined by the Board.

by taking all necessary administrative and technical measures, including the methods

may be transferred under the following conditions:

a. Special categories of personal data other than health and sexual life, personal data in laws

In the event that there is an explicit provision regarding the processing of the data, without seeking the explicit consent of the data owner, otherwise,

in case of obtaining the explicit consent of the data owner.

b. Special categories of personal data related to health and sexual life, protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and

for the purpose of planning and managing the financing of

without seeking explicit consent by persons or authorized institutions and organizations, otherwise the data

with the express consent of the owner.

Personal data, to those who are in the status of "Foreign Country with Sufficient Protection", are subject to the above conditions.

"Adequate Protection" in the absence of adequate protection.

Those with the status of "Foreign Country where the Undertaking Data Controller is located" are in the legislation.

Personal data may be transferred according to the data transfer conditions regulated.

4. PERSONAL DATA INVENTORY PARAMETERS

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. STI Health Services

Giving/Following, Creating/Following Appointment Records, Prescribing, Radiology

Operations, Invoicing, Creation of Personal File, Execution of Job Application Processes,

Execution of Finance and Accounting Affairs, Assignment Processes, Storage and Archive, Working

Issuance of Certificate, Issuance of Responsible Management Certificate, Salary Payment, Employee Identity

Card Creation, Personnel Attendance Control, Internal/External Image Recording System, Occupational Health/Safety

Carrying out the Activities, Obtaining the Document Regarding the Necessary Precautions Against Fire,

Medical Waste Process, Obtaining Radiology License, Promotion, Follow-up of Requests/Complaints, Discount

Execution of Processes, Audit and Inspection Book Records, Information and Transaction Security

Visitors, Patients, Relatives/Parents/Guardians/Representatives, Potential Product or Service

Buyer, Supplier, Supplier Official, Employee, Employee Candidate, Public Institution/Organization

Data categories and personal data belonging to personal data owners consisting of personnel, personal data

processed depending on the processing purposes. Data subject with the purposes of processing according to data categories

contact groups details of UDENTO AGIZ VE DIŞ SAĞAĞI HİZMETLERİ LTD. ŞTİ's

It is reported to the field at <https://verbis.kvkk.gov.tr/>.

Purposes of personal data processing, according to personal data categories, Article 10 of the Law and other legislation.

to inform the relevant persons in accordance with the 5th article of the Law. And the processing of personal data specified in Article 6

Based on and limited to at least one of the conditions of the Law on the processing of personal data,

In accordance with the general principles specified in the Law, especially the principles specified in Article 4.

processed according to the objectives set to achieve it.

Personal data Policy "3.5. With the principles set forth in the "Transfer of Personal Data" section: Health

Ministry and Affiliated Sub-Units, Suppliers, Judicial/Administrative Authorities, Law Enforcement Forces, Medical

Laboratories, Centers and Similar Third Parties with which we cooperate for Diagnosis/Treatment,

Real Persons or Private Law Entities, Other Authorized Public Institutions and Organizations, Social

Security Institution, Pharmacies, Finance, Banks, Persons Shown as Reference

shared purposes. There is no transfer of personal information to foreign countries.

5. MEASURES RELATED TO THE PROTECTION OF PERSONAL DATA

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, in accordance with the procedures and principles determined in the Law.

takes the necessary technical and administrative measures to protect the personal data it processes,

In this context, it carries out the necessary inspections and carries out awareness-raising and training activities.

Although all technical and administrative measures have been taken for the processed personal data, illegal

UDENTO ORAL AND DENTAL HEALTH

SERVICES LTD. ŞTİ will report this situation to the relevant persons and units as soon as possible.

informs.

6. STORAGE AND DISPOSAL OF PERSONAL DATA

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ for the purpose of processing personal data

keep the required period for the minimum period stipulated in the relevant legislation. UDENTO MOUTH AND

DENTAL HEALTH SERVICES LTD. ŞTİ, first of all, if a period is determined in the relevant legislation, this period

appropriate; If a legal period is not foreseen, the personal data will be processed for the period necessary for the purpose of processing the personal data.

stores data. At the end of the specified storage periods, personal data are subject to periodic destruction periods or

in accordance with the data subject application, with the determined method (deletion, destruction or anonymization)

is destroyed.

7. RIGHTS OF PERSONAL DATA OWNERS AND THE USE OF THESE RIGHTS

7.1. Rights of Personal Data Owner

Personal data owners have the following rights arising from the Law:

I. Learning whether personal data is processed or not,

- ii. If personal data has been processed, requesting information about it,
- iii. The purpose of processing personal data and whether they are used in accordance with the purpose learning,
- iv. Knowing the third parties to whom personal data is transferred at home or abroad,
- v. Requesting correction of personal data in case of incomplete or incorrect processing, and Requesting notification of the transaction made within the scope of the transaction to the third parties to whom the personal data has been transferred,
- vi. Although it has been processed in accordance with the provisions of the law and other relevant laws, Deletion or destruction of personal data in the event that the reasons requiring it disappear requesting the transfer of personal data to third parties to whom the personal data is transferred. request notification,
- vii. By analyzing the processed data exclusively through automated systems, to object to the emergence of a result against him,
- viii. In case of loss due to unlawful processing of personal data, do not demand removal.

7.2. Exercise of Personal Data Owner's Rights

Personal data owners can submit their requests regarding the rights listed in Article 6.1 through the methods determined by the Board.

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ. Personal data owners and those who have the right to apply on behalf of the "Data Owner Application Form" (<http://www.udentoconcept.com/>

link) by filling in, UDENTO AĞIZ VE DİŞ SAĞAĞI HİZMETLERİ LTD. ŞTİ can apply to.

7.3. Responding to Applications

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, made by the personal data owner concludes the applications in accordance with the Law and other legislation. UDENTO MOUTH AND duly

DENTAL HEALTH SERVICES LTD. Requests forwarded to ŞTİ, as soon as possible and within 30 (thirty) days at the latest.

concludes it free of charge. However, if the transaction requires an additional cost, the Board

A fee may be charged in accordance with the tariff determined by

7.4. Rejection of Personal Data Owner's Application

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, the request of the applicant,

In the following cases, it may refuse by explaining its reason:

i. By anonymizing personal data with official statistics, research, planning and

processing for purposes such as statistics,

ii. Personal data can protect national defense, national security, public security, public order, economic

not to violate security, privacy or personal rights or to constitute a crime

for purposes of art, history, literature or science, or within the scope of freedom of expression.

processing,

iii. Personal data can be used to protect national defense, national security, public security, public order or

public institutions and organizations authorized by law to ensure economic security

within the scope of preventive, protective and intelligence activities carried out by

processing,

iv. Judiciary regarding the investigation, prosecution, trial or execution of personal data

processing by authorities or enforcement authorities,

v. Personal data processing is necessary for the prevention of crime or for criminal investigation,

vi. Processing of personal data made public by the personal data owner,

vii. Based on the authority given by the law for the processing of personal data, the authorized and authorized public institutions and

supervision or regulation by professional organizations and public institutions.

is necessary for the performance of their duties and for disciplinary investigation or prosecution,

viii. Economic and financial issues of the State regarding the budget, tax and financial matters of personal data processing.

necessary for the protection of their interests,

ix. If the request of the personal data owner is likely to prevent the rights and freedoms of other persons,

x. Making demands that require disproportionate effort,

xi. The requested information is publicly available.

7.5. Right of Personal Data Owner to Complain to the KVK Board

Pursuant to Article 14 of the Law, the application is rejected, the answer given is insufficient, or

in case of not responding to the application in due time; UDENTO ORAL AND DENTAL HEALTH

SERVICES LTD. 30 from the date on which ŞTİ learned of the answer, and in any case, from the date of application.

may file a complaint with the Board within sixty days from

7.6. Information that can be requested from the Applicant Personal Data Owner

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ, the personal data of the applicant

may request information from the person concerned in order to determine whether it is the owner or not. UDENTO ORAL AND DENTAL

HEALTH SERVICES LTD. ŞTİ, the issues included in the application of the personal data owner.

In order to clarify, the personal data owner may ask questions about his/her application.

8. EXECUTION

The policy has been approved and put into effect by the Board of Directors.

with the "Personal Data Retention and Disposal Policy" (at the link <http://www.udentoconcept.com/>) is provided.

The Board of Directors is responsible for the execution and, if necessary, updating of the Law and Policy.

UDENTO ORIGIN AND DIŞ for monitoring, coordination and control of all works and transactions

HEALTH SERVICES LTD. ŞTİ Personal Data Protection Committee is responsible.

9. EFFECT AND ANNOUNCEMENT

The policy has entered into force as of the date of its publication. Changes to the Policy

UDENTO ORAL AND DENTAL HEALTH SERVICES LTD. ŞTİ's website

(<http://www.udentoconcept.com/>) is published and personal data owners can access the data subjects.

is presented. Policy changes come into effect on the date they are announced.