

Udento Oral and Dental Health Services Ltd. Sti

Policy Regarding Sensitive Personal Data

1. Scope

When processed unlawfully, in article 6 of the Law on the Protection of Personal Data No. 6698 ("LAW")

some personal data that carries the risk of causing victimization or discrimination of individuals, "Special Quality Personal Data"

has been determined.

Special categories of personal data are covered by the race, ethnic origin, political opinion, belief, religion, sect or other

beliefs, clothing, association, foundation or union membership, health, sexual life, criminal conviction and security

enters data about the measures taken, as well as biometric and genetic data.

2. Protection of Private Personal Data

With the KVK Law, some personal data, in case of unlawful processing, the victimization of individuals or

Particular attention is paid to the risk of causing discrimination.

Special qualifications determined by our company as "special quality" with the KVK Law and processed in accordance with the law.

is treated sensitively in the protection of personal data.

In this context, technical and administrative measures taken by our Company for the protection of personal data are of special nature.

It is carefully implemented in terms of personal data and necessary audits are provided within the COMPANY.

The Company, in accordance with the decisions of the Board, in the processing of Special Quality Personal Data, which is included in Article 6 of the Law,

takes the necessary precautions as the data controller.

3. Processing of Private Personal Data

In the processing of personal data determined as "special quality" by the KVK Law by our company, KVK

The regulations envisaged in the Law are strictly complied with.

In article 6 of the KVK Law, it causes victimization or discrimination of individuals when processed unlawfully.

A number of personal data that carry the risk of being a "special quality" have been determined.

By our Company in accordance with the KVK Law; personal data of special nature, by the KVK Board

It is processed in the following cases, provided that adequate measures to be determined are taken:

If the personal data owner has express consent, or

If the personal data owner does not have express consent;

- Special categories of personal data other than the health and sexual life of the personal data owner, cases,

- Private personal data of the personal data owner regarding his health and sexual life can only be made public.

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

for the purpose of planning and managing its services and financing,

processed by individuals or authorized institutions and organizations.

The data of special qualifications processed in our company are as follows:

Health Information, Clothing / Clothing Information, Criminal Conviction and Security Measures Information

4. Precautions Regarding the Processing of Private Personal Data

The Company, in accordance with the Board decisions, in the processing of Special Quality Personal Data, which is included in Article 6 of the Law.

As a data controller, it takes the following measures in addition to the measures taken for personal data:

Administrative Measures: Data Security for Employees Involved in the Processing of Special Quality Personal Data

Regular Trainings are Provided on the Subjects, Security Measures of the Environments where the Data is Processed and Stored

Receiving, Unauthorized Entries and Exits Are Blocked

Technical Measures: Policies and Procedures for the Security of Private Personal Data are Determined,

Access Authorization and Role Distribution are Clearly Defined, Periodic Authorization Controls are Performed, Data

Secure encryption / cryptographic keys are used for sensitive personal data in the Electronic Environment where it is processed.

and it is managed by different units, Security Tests Are Performed Regularly, If Transmission via E-Mail Is Required

Encrypted Corporate E-Mail or KEP is Used, Private Transferred on Portable Memory, CD, DVD Media

Qualified Persons Data is Encrypted and Transferred

Our company, by showing the necessary care, taking the necessary security measures and meeting the required qualifications stipulated by the PDP Board

taking measures; In line with the legitimate and lawful personal data processing purposes, the personal data owner has special qualifications.

may transfer its data to third parties in the following cases.

- If the personal data owner has express consent, or
- If there is no explicit consent of the personal data owner;

∅ Special categories of personal data other than the health and sexual life of the personal data owner (race, ethnicity,

political thought, philosophical belief, religion, sect or other belief, disguise, association, foundation or

data on union membership, criminal convictions and security measures, as well as biometric and genetic

data), in cases stipulated by law,

∅ Private personal data regarding the health and sexual life of the personal data owner can only be disclosed to the public.

protection of health, preventive medicine, medical diagnosis, treatment and care services, health under the obligation of secrecy for the purpose of planning and managing its services and financing. by persons or authorized institutions and organizations.

This policy is made by Udentio Oral and Dental Health Services Ltd. It is run by the management of the company.