

Personal Data Protection and Privacy Policy

Scope:

This policy, titled "Personal Data Protection and Privacy Policy," has been prepared by Surgicrafters Health Tourism and Education Consulting Services Import Export Limited Company (Surgicrafters) to explain the complete set of rules for processing personal data and to provide the necessary information.

Definitions:

Personal Data: Any information relating to an identified or identifiable real person.

Special Categories of Personal Data: Data concerning individuals' race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership in associations, foundations or trade-unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

Explicit Consent: Consent that is informed and freely given on a specific subject.

Anonymization: The process of rendering personal data unable to identify a specific or identifiable real person, even if matched with other data.

Processing of Personal Data: Any operation performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Subject: The real person whose personal data is processed.

Data Recording System: The system in which personal data is processed based on certain criteria.

Data Controller: The real or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.

Data Processor: The real or legal person who processes personal data on behalf of the data controller.

Contact Person: The person responsible for the operation of procedures and communication with the Board.

KVKK: The Personal Data Protection Law No. 6698, published in the Official Gazette dated April 7, 2016, and numbered 29677.

KVKK Working Group: Contact Person authorized by Surgicrafters.

Board: Personal Data Protection Board.

Authority: Personal Data Protection Authority.

Policy: Surgicrafters' Personal Data Protection and Privacy Policy.

Personal Health Data: All information relating to the physical and mental health of an identifiable or identified real person and the health services provided to the person.

Erasure of Personal Data: The process of making personal data inaccessible and unusable for the relevant users.

Destruction of Personal Data: The process of making personal data inaccessible, unrecoverable and unusable for anyone.

Periodic Destruction: The process of deleting, destroying, or anonymizing personal data, which is to be carried out automatically at recurring intervals if all the conditions for processing personal data specified in the Law are eliminated.

References: Personal Data Protection Law ('KVKK') And Related Legislation: The Law No. 6698 published in the Official Gazette dated April 7, 2016, and numbered 29677, and related legislation.

Changes: Our policy regarding the changes to be made in this policy at various times following the enactment of the relevant legislation will be updated along with the revision number. Changes will come into effect on the date of publication of the Policy containing the changes.

Purpose: The purpose of this policy is to explain Surgicrafters' data processing activities and to inform the relevant persons, thereby ensuring transparency in the protection of personal data. In this context, Surgicrafters has included in this Policy the processing of personal data within the scope of the KVKK, the data subjects involved in this processing, their rights, the use of cookies and similar technologies, and other relevant matters.

General Principles Related to Data Processing:

Surgicrafters processes personal data in accordance with the following principles as exemplified in the 'Purposes of Processing Personal Data' section of this Policy:

- Compliance with law and integrity,
- Accuracy and, where necessary, up-to-dateness,
- Processing for specified, explicit, and legitimate purpose,
- Being relevant, limited, and proportionate to the purposes for which they are processed,
- Retention for the period stipulated in the relevant legislation or necessary for the purpose they are processed.

Data Processed by Surgicrafters:

Personal data is processed in accordance with Articles 5 and 6 of the KVKK without explicit consent in activities that can be carried out and under the confidentiality obligation specified in Article 6/3 for medical diagnosis, treatment, and care services, and planning and managing health services. For purposes other than these, personal data is processed through explicit consent obtained from data subjects.

The personal data processed in compliance with the principles in this Policy and which vary depending on the nature and type of the relationship between Surgicrafters and the data subject, the communication channels used, and the mentioned purpose information, are as follows:

- Identifying information of the data subject such as name, surname, Turkish ID number, age, profession, title, work information, education status, gender, criminal record, career, IBAN,
- Data such as date of birth, place of birth, identity number, blood group, serial number, volume number, family order number, and photograph found in identity verification documents such as photocopies of identity cards, passports, and driver's licenses,
- Communication records including address, email, phone and fax number, social media address, and communication records within phone conversations and email correspondence,
- Detailed financial data related to collection and payment activities,
- Visual and auditory data such as security camera footage and audio recordings,
- Health data such as medical treatment information, diagnosis information, blood group, health report, applied medical treatment,
- Pre-operative and post-operative photographs.

Purposes of Processing Personal Data:

The personal data obtained from you is processed by Surgicrafters for the following purposes and under the conditions stated in Articles 5 and 6 of the Law, to enable you to benefit from health services provided through health tourism services mediated by our institution:

- Identification,
- Making, reminding, changing appointments, and other notifications related to service provision,
- Evaluation and diagnosis of the patient,
- Outpatient or inpatient treatment of the patient,
- Provision of health services for patient care, including medication and medical supplies,
- Preparing for surgery and conducting related activities,
- Conducting necessary tests and examinations,
- Preparing and controlling medications and materials,
- Conducting imaging and similar activities within the scope of diagnostic and treatment activities for the patient,
- Monitoring the treatment process, creating medical records,
- Managing and storing personal belongings of the patient,
- Conducting processes related to the fees for products and services offered by the Institution,
- Conducting accounting and financial transactions,
- Storing collected data in accordance with legal regulations for the required duration,

- Receiving and evaluating requests and complaints,
- Following and conducting legal processes,
- Fulfilling requests from official institutions,
- Conducting processes related to companies with which we have insurance agreements and/or other institutions,
- Conducting information security processes,
- Conducting inspections and ethical activities by official institutions and professional organizations,
- Conducting market research, promotion, and information activities related to the products and services offered by the Institution,
- Receiving and evaluating feedback on the products and services offered by the Institution,
- Contacting the patient for academic trainings, scientific research, publications, consultancy, and similar activities, and fulfilling requests for participation in training seminars and similar organizations,
- Ensuring workplace security,
- Academic and Educational Use of Data: The collected personal data are used for academic studies, scientific research, and educational purposes by the physicians and health professionals to whom the data is transferred. In this context, the anonymization of the data and its processing in compliance with the Personal Data Protection Law (KVKK) are ensured. The data can be utilized for academic publications in peer-reviewed journals, national and international meetings, conferences, and seminars for scientific and educational purposes. Additionally, it is used in social media, online, and face-to-face meetings for the training of health professionals and patient education.

Transfer of Personal Data:

The personal data and special category personal data collected from you can be transferred, in line with the purposes conveyed above, within the limits and to the extent required by the following regulations: Turkish Commercial Code No. 6102, Tax Procedures Law No. 213, Turkish Civil Code No. 4721, Code of Obligations No. 6098, Basic Law of Health Services No. 3359, Decree Law No. 663 on the Organization and Duties of the Ministry of Health and its Affiliated Institutions, Personal Data Protection Law No. 6698, Regulation on Private Hospitals, Regulation on the Processing of Personal Health Data and the Protection of Privacy, Regulation on International Health Tourism and Tourist's Health, and other regulations and provisions set by the Ministry of Health. This transfer of data will be to our employees, doctors, auxiliary health workers, suppliers, service providers we collaborate with to conduct our services, legal consultants, legally authorized public institutions, and legally authorized private individuals, in accordance with the conditions for data processing set out in Articles 5 and 6 of the Law, and in compliance with the rules regarding the transfer of personal data stated in Articles 8 and 9 of the Law. With your explicit consent, your personal data can be transferred to contracted institutions,

insurance companies, and hospitals, or those authorized by contracted institutions, insurance companies, hospitals for the purposes of managing provision and billing processes related to the services we offer, ensuring you benefit from health, travel, complication, etc. insurances, and conducting payment processes related to your treatment expenses. With your explicit consent, your relevant health data and other personal data can be transferred, limited to your request, to your relatives you specify by name or to third parties. Also, with your explicit consent, communication can be established with you via email and social media applications.

Collection of Personal Data:

Your personal data is collected by our Institution within the scope of the purposes mentioned above; through our computer environments, tablets, institutional information management software, our website where online services are offered, email and social media applications, and in the physical environment through our health forms, cargo/post, fax, and face-to-face meetings. If opportunities related to the Institution's services are provided to your relatives under agreements that may occasionally occur between the Institution and contracted insurance companies, your personal data may also be obtained through information and documents provided by such relatives. Your personal data is processed based on the legal reasons mentioned below, in accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law. Your personal data is processed within the scope of Article 5 of the Law for reasons such as the establishment and performance of a service contract, the fulfillment of the Institution's legal obligations, the establishment, exercise or protection of a right, and the necessity of data processing for the legitimate interests of the Institution. Your health data is processed by persons under confidentiality obligation in accordance with Article 6/3 of the Law, for the purposes of conducting medical diagnosis, treatment, and care services, and planning and managing health services.

Retention Period of Personal Data:

Personal data is retained within Surgicrafters for the relevant legal retention periods and as long as necessary for the activities related to these data and the purposes stated in this Policy. Personal data whose purpose of use has ended and whose legal retention period has expired will be deleted, destroyed, or anonymized.

Rights of the Data Subject Under the KVKK:

As the personal data owner, we inform you that you have the following rights under Article 11 of the Law:

- To learn whether your personal data is processed
- To request information if your personal data has been processed

- To learn the purpose of processing your personal data and whether they are used in accordance with their purpose
- To know the third parties to whom your personal data is transferred domestically or abroad
- To request correction of your personal data if it has been processed incompletely or inaccurately, and to request notification of the operation to third parties to whom personal data has been transferred
- To request the deletion or destruction of personal data if the reasons for processing have ceased to exist, despite being processed in accordance with the Law and other relevant legal provisions, and to request notification of the operation to third parties to whom personal data has been transferred
- To object to the emergence of a result against you by analyzing the processed data exclusively through automated systems
- To demand compensation for damage in case of loss due to unlawful processing of personal data

Minors:

Individuals under the age of 18 must visit the Website under the supervision of their parents. They should not share any personal data without the accompaniment of their parents. The personal data of minors is collected with the explicit consent of the parent who has custody authority.

Security of Personal Data:

Surgicrafters attaches importance to the confidentiality and security of personal data. Accordingly, it takes necessary technical and administrative security measures to protect personal data from unauthorized access, harm, loss, or disclosure.

Responsibility:

The implementation and execution of the requirements of this policy are the responsibility of the KVKK Working Group. The contact person is responsible for all communication with the Board.

Effectiveness and Control:

This policy comes into effect on the date of its publication, and the KVKK Working Group is responsible for keeping the procedure up to date.

Revision History

Revision No: 00 Publication of the Document: 22.12.2023