

## **CLARIFICATION TEXT ON THE PROCESSING OF PERSONAL DATA OF NON-ADULT PATIENTS**

Dear Parents and Legal Guardians,

At Surgicrafters Health Tourism and Education Consulting Services Import Export Limited Company (**The Company**) we strive to provide safe access and the best care for our patients under the age of 18. In this context, we act as a data controller in accordance with the Law No. 6698 on the Protection of Personal Data (“**the Law**”) with sensitivity towards the protection and security of our non-adult patients' personal data. Our Company processes your personal data and the data of the minors under your guardianship within the principles of privacy and protection of private life. You and the legal representatives of these individuals can access the purposes of personal data processing and our policies at <https://surgicrafters.com/>.

### **Definitions:**

- Personal Data: Any information relating to an identified or identifiable natural person
- Personal Data Protection Law (“KVKK”): The Law No. 6698 on the Protection of Personal Data, which came into force on April 7, 2016, as published in the Official Gazette
- Data Processor: A real or legal person who processes Personal Data on behalf of the data controller, based on the authority given by the data controller
- Data Controller: A real or legal person responsible for establishing and managing the data recording system, determining the purposes and means of processing Personal Data.

### **Purpose of Processing Personal Data:**

The data obtained from you and the minor under your supervision and consent are processed by our Company for the following purposes, under the conditions specified in Articles 5 and 6 of the Law, to enable you to benefit from the health tourism services facilitated by our Company:

- Identification
- Creating, reminding, changing appointments, and carrying out 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
- Preparation and execution of surgery-related activities
- Conducting necessary tests and examinations
- Preparation and control of 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
- Management and provision of storage services for personal belongings of the patient
- Conducting processes related to the fees for products and services offered by the Company
- Conducting accounting and financial transactions
- Storing collected data in accordance with legal regulations and for the required duration
- Receiving and evaluating requests and complaints
- Following and conducting legal processes
- Fulfilling requests from official Companies
- Conducting processes related to companies with which we have insurance agreements and/or other Companies
- Conducting information security processes
- Performing audits and ethical activities by official Companies and professional organizations
- Conducting market research, promotion, and information activities related to the products and services offered by the Company
- Receiving and evaluating feedback on the products and services offered by the Company
- 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

**Method and Legal Reason for Collecting Personal Data:**

The data of the minors under your guardianship is collected by our Company within the scope of the purposes mentioned above; through our computer environments, tablets, Companyal information management software program, our website where online services are provided, email and social media applications, and in the physical environment through our health forms, cargo/post, fax, face-to-face meetings. If opportunities related to the Company's services are provided to your relatives under agreements that may occasionally occur between the Company 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.

The personal data provided to us is processed in accordance with Article 5 of the Law for reasons such as the establishment and performance of a service contract, the fulfilment of the Company's legal obligations, the establishment, exercise or protection of a right, and the necessity of data processing for the legitimate interests of the Company. The health data of your child 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.

**To Whom and for What Purpose the Processed Personal Data Can Be Transferred:**

The collected personal data; within the scope of the purposes mentioned above, can be transferred, to the extent necessary and limited, to our employees, doctors, auxiliary health personnel we receive services from, our suppliers, service providers we cooperate with, our legal consultants, legally authorized public Companies and legally authorized private individuals, in accordance with the data processing conditions stated in Articles 5 and 6 of the Law and in accordance with the rules related to the transfer of personal data specified in Articles 8 and 9 of the Law. With your explicit consent, your personal data can be transferred to contracted Companies, insurance companies, and hospitals or to insurance companies and hospitals authorized by the contracted Company for the purposes of carrying out processes related to the services we offer, such as provision and billing, benefiting from health travel complications and other insurances, and carrying out payment processes related to your treatment expenses. With your explicit consent, your relevant health data and other personal data can be transferred to the relatives you have named or to third parties, limited to your request. With your explicit consent, communication can be established with you via email and social media applications.

**Data Retention Period:**

Your personal data will be processed in accordance with the retention and limitation periods specified in the relevant laws and regulations, primarily health legislation, to which our Company is obliged to comply. If there are changes in the data processing durations in the laws, the newly determined durations will be taken as the basis.

Rights of the Data Subject as Stated in Article 11 of the Law;

As the personal data owner, we inform you that you have the following rights on behalf of the person under your guardianship/wardship, in accordance with Article 11 of the Law:

- To learn whether their personal data is processed
- To request information if their personal data has been processed
- To learn the purpose of processing their personal data and whether they are used in accordance with their purpose
- To know the third parties to whom their personal data is transferred domestically or abroad
- To request correction of their 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 them by analysing the processed data exclusively through automated systems
- To demand compensation for damage in case of loss due to unlawful processing of personal data

**Contact:**

You can submit your applications regarding the above-mentioned rights to our Company in accordance with the legislation. If you wish, you can submit your application using the application form found at <https://surgicrafters.com/>.

For written applications:

You can deliver a wet-signed copy of the Application Form directly to our Company or send it by mail to "Esentepe Mah. Kelebek Sk. Marmara Kule A Block No: 2 Internal Door No: 213 Kartal - Istanbul, Turkey".

**For electronic applications:**

You can sign the Application Form with an electronic or mobile signature that has a "secure electronic signature" certificate defined in the Electronic Signature Law No. 5070 and send it to the Registered Electronic Mail (KEP) address of our Company's responsible manager at [surgicrafters@hs01.kep.tr](mailto:surgicrafters@hs01.kep.tr).

Your applications will be concluded free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, a fee may be charged according to the tariff determined by the Personal Data Protection Board.