

CLARIFICATION TEXT

ON THE LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA

This Clarification Text on the Law on the Protection of Personal Data (“**Clarification Text**”) is prepared by Healtha Global Sağlık Danışmanlık Hizmetleri A.Ş. (“**Healtha**” or “**Company**”) as the data controller pursuant to the Law No. 6698 on the Protection of Personal Data (“**Law**”), which was introduced to protect the fundamental rights and freedoms of individuals, particularly the privacy of private life with respect to processing of personal data, and to determine the obligations of natural and legal persons who process personal data, and the Communiqué on Principles And Procedures To Be Followed In Fulfillment of the Obligation to Inform (“**Communiqué**”), which entered into force by being published in the Official Gazette No. 30356 dated 10.03.2018.

The purpose of this Clarification Text is to fulfill the obligation to inform imposed by Article 10 of the Law No. 6698 on the Protection of Personal Data with respect to the use of personal data that are obtained during the use of www.healtha.com.tr (“**Site**”) which is managed by Healtha and/or obtained from third parties. Another purpose is to transparently inform the Users/Members about the methods of collection, and the purposes and legal reasons for the processing of the personal data collected by Healtha in relation to the use of the website by the Users or personal data entered by the Users/Members themselves by their positive actions, and about the rights of Users/Members.

1. Personal Data and Processing

It is stated in paragraph d of Article 3 entitled “Definitions”, which is included in the Law No. 6698 on the Protection of Personal Data, that the personal data include any information about a real person whose identity is known or identifiable.

Under the Law, processing is defined as any operation performed on personal data such as the acquisition, recording, storage, preservation, modification, adjustment, disclosure and transfer of personal data or taking them over, making them available for acquisition, classifying them or blocking its use by fully or partially automated or non-automated means, provided that the data are a part of any data recording system.

Personal data of Members and Users: Identity information (Name Surname, TR Identity No., place and date of birth, marital status, gender, insurance or patient protocol number and other identity data, with which we can identify you.)

Contact information (address, mobile phone number, e-mail address, other contact data, your audio phone call records that are stored by customer representatives or patient services in accordance with the call center standards, and your personal data that are obtained when you contact us via e-mail, letter or other channels.)

Your Accounting Information (Your financial data such as your bank account number, IBAN number, credit card information, billing information.)

Your private health insurance data and Social Security Institution data for the purpose of financing and planning health services.

If you visit our hospitals or medical centers, your camera recordings which are stored for security and inspection purposes.

Your Health Information (any personal data in relation to health and sexual life that are obtained during or as a result of medical diagnosis, treatment and care services, including but not limited to your laboratory results, test results, examination data, appointment information, check-up information and prescription information.)

Your health data and other personal data that you sent or entered to www.healtha.com.tr or www.healtha.com.tr/healthaOnline/TR/MainPage.

If you apply for a job at Healtha or any of the Healtha Group companies, your other personal data, including your resume which you provided for this purpose, and your service contract and any personal data related to your suitability for the relevant job, if you are a Healtha Group employee or related employee.

2. Data Controller

Your personal data will be collected and may be processed by Healtha, in its capacity as the data controller within the scope described below pursuant to the Law on the Protection of Personal Data, the Basic Law No. 3359 on Health Services, the regulations of the Ministry of Health and other relevant legislation.

3. Purpose for Processing Your Personal Data

Your personal data will be processed in accordance with the conditions for processing personal data, which are set forth in Articles 5 and 6 of the Law on the Protection of Personal Data and in accordance with the basic principles stipulated in the Law on the Protection of Personal Data. Any personal data of yours which is obtained by the Healtha Group (including but not limited to sensitive personal data) will be processed for the following purposes:

- Confirming your identity,
- Carrying out intermediation activities, medical diagnosis, treatment and care services, planning and managing health services and financing,
- Sharing the requested information with the Ministry of Health and other public institutions and organizations in accordance with the relevant legislation,
- Planning and managing the internal functioning and daily operations of our hospitals and medical centers
- Measurement, improvement and research of patient satisfaction by Hospital Management, Patient Rights, Patient Experience departments,
- Drug supply,
- Being able to inform you about your appointment if you made one,
- Carrying out the risk management and quality improvement activities,

- Performing analyses to improve healthcare services,
- Financing of your healthcare services, payment of your examination, diagnosis and treatment expenses by the Patient Services, Financial Affairs, Marketing departments, sharing the information requested by private insurance companies with them within the scope of questioning eligibility,
- Conducting research,
- Fulfilling legal and regulatory requirements,
- Sharing the information requested by private insurance companies with them for the financing of healthcare services,
- Performance of risk management and quality improvement activities by the Quality, Patient Experience, Information Systems departments.
- Billing for our services by the Patient Services, Financial Affairs and Marketing departments, and confirming your relationship with the contracted institutions.
- Provision of information on participation in campaigns and campaign information by the Marketing, Media and Communication, Call Center departments, designing and conveying tailored content, tangible and intangible benefits on web and mobile channels.
- Provision of services to users/members by Healtha,
- Carrying out the necessary operational activities within Healtha to ensure that services are provided to customers/members by Healtha,
- Within the scope of the provision of services by Healtha; checking errors to reduce the errors that may be found in the software on the website and in mobile applications,
- Increasing the security in the system and improving the services operated by Healtha,
- Detecting the problems in the system and fixing them as quickly as possible,

- Carrying out the necessary work with the relevant business unit and business partners for Healtha to propose services that are suitable for the motivation of its users/members, and managing the related processes,
- Tracking and managing the requests and complaints of the Users/Members;
- Conducting satisfaction studies for Users/Members and other similar purposes
- Performing the basic functions required for the operation of the site,
- Carrying out and improving operational activities such as user registration, problem/error reporting, control, inquiry,
- User/customer portfolio management,
- Improving the functionality of the site and providing ease of use,
- Resolving the problems and complaints of the members,
- Performing statistical assessments and studies,
- Compliance with the legal processes and legislation,
- Responding to information requests from administrative and judicial authorities,
- Planning internal site reporting and business development activities,
- Submitting the legal notifications by performing financial control and reporting,
- Performance of the necessary work for the services offered by our site by our business units.

4. Personal Data Retention Period

Healtha will retain the personal data it obtains for the duration required for the purpose for which they were processed in order to fulfill its obligations arising from the nature of the Membership Agreement and in accordance with the terms specified in this Clarification Text and the Membership Agreement so that the Users can benefit from the Service in the best way.

In addition, in case of any dispute arising from the Membership Agreement, Healtha will retain personal data for a period that is limited by the purposes for the execution of administrative or judicial processes within the scope of the dispute and for the period of limitation, as determined by the relevant legislation.

5. Parties to which Your Personal Data are Transferred and Purposes for Transfer

Your personal data which are collected on our site under the conditions for processing personal data, which are set forth in Articles 8 and 9 of the Law on the Protection of Personal Data, and in accordance with the basic principles that are set out under the Law on the Protection of Personal Data and other legislation, and through the purposes provided above, can be shared by Healtha and the Healtha Group with member companies of the Healtha Group, Private insurance companies, the Ministry of Health and its sub-units, the Social Security Institution, the General Directorate of Police and other law enforcement agencies, General Directorate of Population, Turkey Pharmacists Association, Courts and any judiciary authority, center, and other third parties, your authorized representatives, third parties which we receive counselling from, including lawyers, tax and financial consultants and auditors, as well as regulatory and supervisory agencies, and official authorities, in addition to our business partners and other third parties to improve or carry out healthcare services for the above-mentioned purposes. Healtha, Healtha's parent company, subsidiaries, representatives, licensors, suppliers, expertise, call centers, banks, insurance companies, other credit institutions and institutions, organizations, authorities, administrative and judicial bodies which are authorized under legal obligations can be transferred for the following purposes:

- Delivering general notifications,
- Identifying and implementing the commercial and business strategies of the company,

- Performance of the necessary work by our business units to ensure that you utilize the products and services offered by Healtha and legal and natural persons who are in a business relationship with Healtha,
- In accordance with the relevant legislation or in response to a subpoena or order from an official institution,
- Carrying out the human resources policies of the site,
- Restructuring, merger, sale, joint venture, transfer or disposal of the business, assets,

In case of the above, the processed personal data are accurately stored up-to-date in accordance with the methods stipulated in the relevant legislation and Board decisions, and transferred to third parties.

6. Method and Legal Reason for the Collection of Your Personal Data

The personal data that are collected on our company's servers can be collected by our Company in any verbal, written, visual or electronic form through automated or non-automated methods, executed contracts, printed forms, website, cookies used on these sites, telephone, SMS, e-mail, social media channels, mobile applications and similar means so that any business that is included in Healtha's field of activity can be carried out legally, and Healtha can fully and properly fulfill its contractual and legal obligations in this respect. The legal reasons for the collection of your personal data are;

Law No. 6698 on the Protection of Personal Data,

Basic Law No. 3359 on Health Services,

Regulation on the Processing and Protection of Privacy of Personal Health Data,

Regulations of the Ministry of Health and other legislative provisions.

They are collected to carry out our activities based on legal reasons such as fully and accurately fulfilling the Company's obligations arising from the contract and the law, and

its purposes that are listed in this Clarification Text. The personal data that are collected on the basis of these legal reasons will be processed in accordance with the basic principles of the Law and the conditions included in Articles 5 and 6 of the Law on the Protection of Personal Data.

As a rule, the explicit consent of the relevant person must be available to for their personal data to be processed. However, it is possible to process personal data without seeking the explicit consent of the relevant person in the presence of one of the following conditions pursuant to Articles 5/2 and 6/3 of the Law on the Protection of Personal Data.

Pursuant to Articles 5/2 of the Law on the Protection of Personal Data;

- a) It is clearly stipulated in the laws,
- b) It is compulsory for the protection of the life or bodily integrity of a person who is unable to give their consent due to actual incapability or whose consent is not legally valid
- c) It is necessary to process the personal data of the parties to a contract, provided that it is directly related to the execution or performance of a contract,
- d) It is mandatory for the data controller to be able to fulfill its legal obligation,
- e) It is made public by the relevant person themselves,
- f) Data processing is mandatory for the establishment, use or protection of a right,
- g) Data processing is mandatory for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the relevant person are not violated.

Article 6 of the Law on the Protection of Personal Data regulates the conditions for processing sensitive personal data. Sensitive personal data are defined as data related to a person's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, attire and clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data. As a rule, processing sensitive personal data without the explicit consent of the relevant person is prohibited. However, it is possible to process personal data without seeking the explicit consent of the relevant person in the presence of one of the following conditions pursuant to Articles 6/3 of the Law on the Protection of Personal Data:

- a) Protection of public health,
- b) Preventive medicine,
- c) Medical diagnosis,
- d) Carrying out treatment and care services,
- e) For the purpose of planning and managing health services and financing,
- f) Persons who are under the confidentiality obligation,
- g) Authorized institutions and organizations

Your personal data collected by these methods can be processed and transferred for the purposes specified in this Clarification Text under the conditions and purposes for processing personal data in accordance with the Law No. 6698 on the Protection of Personal Data, Basic Law No. 3359 on Health Services, Regulation on the Processing and Protection of Privacy of Personal Health Data, Ministry of Health regulations and other legislation provisions.

7. Transfer of Your Personal Data

Your personal data which you submitted to our Company under the services you received from www.healtha.com.tr or which are obtained by our Company through

other channels in accordance with the Law No. 6698 on the Protection of Personal Data, can be processed by our Company, in its capacity as the “Data Controller” under the purposes and scope described below. Your personal data can be shared by healtha.com.tr, Healtha and the Healtha Group with member companies of the Healtha Group, Private insurance companies, the Ministry of Health and its sub-units, the Social Security Institution, the General Directorate of Police and other law enforcement agencies, General Directorate of Population, Turkey Pharmacists Association, Courts and any judiciary authority, center, and other third parties, your authorized representatives, third parties which we receive counselling from, including lawyers, tax and financial consultants and auditors, as well as regulatory and supervisory agencies, and official authorities, in addition to our business partners and other third parties to improve or carry out healthcare services for the above-mentioned purposes pursuant to the rules that are regulated in Article 8 of the Law on the Protection of Personal Data by obtaining your explicit consent pursuant to the regulation set forth in Article 4/2 of the Law on the Protection of Personal Data or without obtaining your explicit consent in the presence of cases that are set forth in Articles 5/2 and 6/3 of the same law.

8. International Personal Data Transfer

Law on the Protection of Personal Data Your personal data can be transferred by healtha.com.tr to persons and organizations residing only in the countries with the sufficient level of protection, which are identified by the Personal Data Protection Board (“**Board**”) without seeking the explicit consent of the relevant person, if there is a sufficient level of protection in the country, to which the personal data will be transferred, pursuant to the rules that are regulated in Article 8 of the Law on the Protection of Personal Data by obtaining your explicit consent pursuant to the regulation set forth in Article 4/2 of the Law on the Protection of Personal Data or without obtaining your explicit consent in the presence of cases that are set forth in

Articles 5/2 and 6/3 of the same law. Countries with the sufficient level of protection will be identified and announced by the Personal Data Protection Board.

9. Rights of the Relevant Person, which are Listed in Article 11 of the Law on the Protection of Personal Data

If you, as the personal data subject, submit your requests in relation to your rights to our Company through the methods set out below herein pursuant to Article 13/1 of the Law on the Protection of Personal Data, our Company will conclude the request free of charge as soon as possible and in any case within no later than thirty days, depending on the nature of the request. However, in some necessary cases, the fee in the tariff stipulated by the Personal Data Protection Board will be charged. In this context, the data subjects have the right to;

- Learn whether their personal data are processed,
- Request information on the processing of their personal data, if they are processed,
- Learn the purpose for the processing of their personal data and whether they are used for their intended purposes,
- Know the domestic or international third parties to whom their personal data were transferred,
- Request the correction of their personal data, if they are processed incompletely or incorrectly and request that the transaction made in this respect is notified to the third parties to whom their personal data were transferred,
- Request the deletion or destruction of their personal data, if the reasons which required them to be processed, no longer exist, even if they were processed in accordance with the provisions of the Law on the Protection of Personal Data and the other relevant laws, and request that the transaction

made in this respect is notified to the third parties to whom their personal data were transferred,

- Object to the occurrence of a result against the person himself/herself through the analysis of the processed data exclusively via automated systems,
- Request to be indemnified for their losses if they incur losses due to the unlawful processing of

their personal data.

10. Method of Application to the Data Controller

To exercise your above-mentioned rights pursuant to Article 13/1 of the Law on the Protection of Personal Data, and the Communiqué on the Procedures and Principles for Application to the Data Controller, you can fill out the Data Subject Application Form under the link to the Law on the Protection of Personal Data, which is included in www.healtha.com.tr/healthaOnline/TR/MainPage **and personally deliver it or send it to** **through** a notary public, by registered mail on behalf of the relevant Company or scan such form and send it to the aforementioned address via secure electronic signature, mobile signature or your e-mail address which was previously notified by you to Healtha and is registered in our systems.

Your request, which you submit to our company, can be accepted or rejected with justification by us. The response will be informed to the relevant person in writing or electronically by our company.

If the request is accepted, the application will be promptly fulfilled by our company. If the request is rejected, the response is found to be insufficient, or the application is not answered within the time limit, the relevant person's right to apply to the Board within

30 days of the date of the response or in any case 60 days of the application date, is reserved.

11. Deletion, Destruction or Anonymization of Personal Data

Personal data will be deleted, destroyed or anonymized ex officio or upon the request of the relevant person by the Company, if the reasons which required them to be processed, no longer exist, even if they were processed in accordance with the provisions of the Law on the Protection of Personal Data and the other relevant laws.

You can visit the website of the Personal Data Protection Authority (<https://www.kvkk.gov.tr/>) to get detailed information about your rights under the Law No. 6698 on the Protection of Personal Data and the relevant legislation.

TEXT FOR EXPLICIT CONSENT and COMMUNICATION PERMIT

I hereby agree that my Personal Data will be processed for purposes that are explained in detail within the **Clarification Text on the Law on the Protection of Personal Data**; my personal data will be processed to be customized based on my likes, usage habits and needs, under this text for the purpose of planning and executing the marketing processes; and the contact information I shared in this respect will be used to inform me of advertisements, promotions, campaigns and for other similar commercial electronic messages, and will be shared with suppliers from which the Company receives services for this purpose.

DATA SUBJECT APPLICATION FORM

General Remarks

In the Law No. 6698 on the Protection of Personal Data ("KVKK"), certain rights are granted to personal data subjects ("Applicant") who are defined as the relevant persons, in Article 11 of the Law on the Protection of Personal Data, in relation to the processing of their personal data.

The applications to be made to our Company, as the data controller, with respect to such rights must be submitted to us in writing or by other methods identified by the Personal Data Protection Board ("Board") pursuant to Article 13/1 of the Law on the Protection of Personal Data.

In this respect, in the applications to be made to our Company in "writing" this Application Form must be filled in, and

- The original signed Form must be personally hand delivered to or
- The original signed Form must be served to through a notary public or
- Send the Form, using the registered electronic mail (KEP), which is registered at , secure electronic signature, mobile signature or your e-mail address, which you previously notified to us and is registered in our system, along with its mentioned attachments.

1. Your Contact Information

Full Name	:
Republic of Turkey Identity Number	:
Telephone	:
E-mail	:
Address	:

2. Your relationship with our Company

Please choose the appropriate option from the following about your relationship with our Company, and please provide information on whether the relationship still continues, and if not, the periods during which it continued, the department / branch of our Company, which you are in contact with as part of your relationship with our Company, if it exists, and any other information describing your relationship with our company in the space below.

<input type="checkbox"/> Employee	
<input type="checkbox"/> Former Employee	
<input type="checkbox"/> Business	
Partner/Consultant	
<input type="checkbox"/> Visitor	
<input type="checkbox"/> Supplier/Service Provider	
<input type="checkbox"/> Customer	
<input type="checkbox"/> User/Member	

<input type="checkbox"/> Other	
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3. Your request (Mandatory field)		
Please indicate your request(s) regarding personal data by marking the relevant box below with (X). If you make a request by selecting the relevant box, you will need to submit the information and documents that would be required to be provided in relation to such request, to our Company along with this Form.		
Request	Choice	Information/Documents that are Required to be Provided
I would like to know if your company processes personal data about me	<input type="checkbox"/>	If there are certain data, which you think are processed, please specify them in the space provided underneath this table.
If your company processes personal data about me, I request information about these data processing activities. <i>Article 11/1 (b) of the Law on the Protection of Personal Data</i>	<input type="checkbox"/>	If there are certain data, for which you would like to learn the data processing activity, please specify them in the space provided underneath this table.
If your Company processes personal data about me, I would like to learn the purpose for their processing, and whether they are used for their intended purposes of processing. <i>Article 11/1 (c) of the Law on the Protection of Personal Data</i>	<input type="checkbox"/>	If there are certain data, for which you would like to learn the purpose of processing, please specify them in the space provided underneath this table
If my personal data are transferred to domestic or international third parties, I would like to know such third parties. <i>Article 11/1 (c) of the Law on the Protection of Personal Data</i>	<input type="checkbox"/>	If there are certain data, which constitute the subject of your request, please specify them in the space provided underneath this table.
I think that my personal data are processed incompletely or incorrectly, and I want them to be corrected. <i>Article 11/1 (d) of the Law on the Protection of Personal Data</i>	<input type="checkbox"/>	Please specify your personal data, which you think are processed incompletely or incorrectly, and how you would like it to be corrected in the space provided underneath this table or in the Form attachment, and submit documents such as a photocopy of your identity card or any invoice and residence document, which confirms your correction request as attached to this Form.
I think that the reasons which required my personal data to be processed, no longer exist, even if they were processed in accordance with the provisions of the law and the other relevant laws, and hence, request my personal data to be; a) Deleted. b) Anonymized. <i>Article 11/1 (e) of the Law on the Protection of Personal Data</i>	a) <input type="checkbox"/> b) <input type="checkbox"/>	Please indicate why you think the reason for processing your personal data, no longer exists, and the data, which you would like to be deleted/destroyed, in the space provided underneath this table or in the Form attachment, and submit any documents, which validate your request as attached to this Form.
I would like my personal data, which I think are processed incompletely or incorrectly, to be also corrected by the third parties, to which they were transferred. <i>Article 11/1 (f) of the Law on the Protection of Personal Data</i>	<input type="checkbox"/>	Please specify your personal data, which you think are processed incompletely or incorrectly, and how you would like it to be corrected in the space provided underneath this table or in the Form attachment, and submit documents such as a photocopy of your identity card or any invoice and residence document, which confirms

<p>I think that the reasons which required my personal data to be processed, no longer exist, even if they were processed in accordance with the provisions of the law and the other relevant laws, and hence, request my personal data to be also;</p> <p>a) Deleted.</p> <p>b) Anonymized. by the third parties, to which they were transferred.</p> <p><i>Article 11/1 (f) of the Law on the Protection of Personal Data</i></p>	<div></div> <p>a) <input type="checkbox"/></p> <p>b) <input type="checkbox"/></p>	<p>your correction request as attached to this Form.</p> <p>Please indicate why you think the reason for processing your personal data, no longer exists, and the data, which you would like to be deleted/destroyed, in the space provided underneath this table or in the Form attachment, and submit any documents, which validate your request as attached to this Form.</p>
<p>I think that my personal data which are processed by your Company, are analyzed exclusively via automated systems, as a result of which, an adverse consequence occurred for myself. I object to this consequence.</p> <p><i>Article 11/1 (g) of the Law on the Protection of Personal Data</i></p>	<div></div> <p><input type="checkbox"/></p>	<p>Please indicate the data, which you think is analyzed via automated systems, and the consequence, which you think is adverse for you, in the space provided underneath this table or in the Form attachment, and submit any documents, which validate your request as attached to this Form.</p>
<p>I incurred losses due to the unlawful processing of my personal data.</p> <p>I request indemnification for such losses.</p> <p><i>Article 11/1 (h) of the Law on the Protection of Personal Data</i></p>	<div></div> <p><input type="checkbox"/></p>	<p>Please indicate why you think your personal data are unlawfully processed, along with the unlawful processing activity, and the loss you incurred in the space provided underneath this table or in the form attachment. You may also submit the Personal Data Protection Board or court decisions, which support/validate your request, as attached to this Form.</p>

Please indicate below the information you ask for in relation to your requests, which you provided above, and the documents you submitted in the Form attachment

Please indicate the method by which you will be notified of the response to your application by our Company.

☐ I would like to personally receive it

☐ I would like it to be sent to my address

☐ I would like it to be sent to my e-mail address (In case of receipt by proxy, a notarized power of attorney is required.)

This application form has been prepared to determine your relationship with our Company, and to fully respond to your application accurately and within the legal timeframe, if any of your personal data is processed by our Company. If the information you provided in relation to your requests, which you

submitted as part of the form is not accurate or up-to-date or an unauthorized application is made, our Company does not accept any liability for requests arising from such false information or unauthorized application.

Applicant Personal Data Subject

Name - Surname :

Application Date :

Signature :

Healta Google advertisement text

With JCI certification, we provide treatment capabilities in Turkey's best-equipped hospitals, and specialist doctors. With our team, we plan all the stages of your journey, including accommodation, transportation, before and after.