

OP. DR. NIYAZI ALTINTOPRAK

PERSONAL DATA PROTECTION AND PROCESSING POLICY

Document Name: Op. Dr. Niyazi Atintoprak Personal Data Protection and Processing Policy

Target Audience: All real persons other than the employees of Op. Dr. Niyazi Atintoprak whose personal data are processed by Op. Dr. Niyazi Atintoprak

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Version 1.0

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OP. DR. NİYAZİ ALTINTOPRAK
PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. INTRODUCTION

Op. Dr. Niyazi Altintoprak ("**Niyazi Altintoprak**") carefully processes and protects personal data within the scope of the Personal Data Protection Law No. 6698 ("**Law**") and the Regulation on Personal Health Data ("**Regulation**"). With the Personal Data Protection and Processing Policy ("**Policy**"), Niyazi Altintoprak processes and practices will be harmonized with the Law and health services will be provided more effectively and efficiently. On the other hand, as the data controller, importance is attached to the protection of privacy, fundamental rights and freedoms.

1.1. Purpose

The purpose of the Policy is to regulate the procedures and principles to be followed by Niyazi Altintoprak regarding the regulations stipulated by the Law and to provide the necessary transparency by informing the personal data owners. With the Policy, Niyazi Altintoprak determines the purposes of processing personal data and the units that will carry out these activities, necessary administrative and technical measures are taken for the processing and protection of personal data, internal procedures are established; appropriate and effective audit mechanisms are established by taking all necessary measures for the compliance of shareholders, officials, employees and business partners with the Law processes.

1.2. Scope

In Niyazi Altintoprak business processes, all personal data belonging to patients, employees, employee candidates, supplier officials, hospital officials, users visiting the website and other persons, which are processed automatically or non-automatically provided that they are part of any data recording system (Protocol Book, Forensic Report Record Book and Inspection Book) are covered by the Policy. Data categories and personal data (Annex-1) of personal data owners (Annex-2) are processed depending on the purposes of personal data processing (Annex-3). The purposes of processing according to the data categories and the details of the data subject groups can be found at <https://verbis.kvkk.gov.tr/> in the Niyazi Altintoprak area. Personal data are processed and protected in accordance with the standards set by the Law, with a high level of responsibility and awareness based on the Policy.

1.3 . Basis

Policy, Basic Law No. 3359 on Health Services, Decree Law No. 663 on the Organization and Duties of the Ministry of Health and its Affiliated Institutions, Regulation on Private Health Institutions Providing Outpatient Diagnosis and Treatment Services, Patient Rights Regulation, Health Implementation Communiqué and Patient Rights Regulation, Personal Data Protection Law No. 6698, The Regulation on Processing and Ensuring the Privacy of Personal Health Data is based on the Identity Notification Law No. 1774, Labor Law No. 4857, Occupational Health and Safety Law No. 6331, Social Security and General Health Insurance Law No. 5510, Unemployment Insurance Law No. 4447, Turkish Commercial Code No. 6102, Turkish Code of Obligations No. 6098, Tax Procedure Law No. 213 and other relevant legislation in force. In cases of incompatibility between the legislation in force and the Policy, the legislation in force shall apply. The regulations stipulated by the relevant legislation are transformed into Niyazi Altintoprak practices with this Policy.

1.4 . Definitions

In this Policy;

TO EXPRESS CONSENT	Consent to a specific subject matter, based on information and freely given
OPEN HEALTH DATA	Health data made open data
OPEN DATA	Anonymized data that is made publicly available over the internet free of charge or at a cost not exceeding the cost of its preparation, has no intellectual property rights and can be freely used for any purpose, can be read by machines and thus interoperable with other data and systems
ANONYMIZATION	The process of anonymizing personal data so that they cannot be associated with an identified or identifiable individual, even when matched with other data
e-NABIZ	The system established by the Ministry in accordance with e-Government applications, which provides access to the health data of the relevant persons by themselves, physicians or third parties authorized by them
RELEVANT USER	The person who processes personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except for the person or unit responsible for the technical storage, protection and backup of the data
DISPOSAL	Deletion, destruction or anonymization of personal data
RECORDING MEDIUM	Any medium containing personal data that is fully or partially automated or processed by non-automated means, provided that it is part of any data recording system
DE-IDENTIFICATION	Processing of personal data in such a way that it cannot be associated with the person concerned, provided that technical and administrative measures are taken to ensure that personal data cannot be associated with an identified or identifiable natural person and cannot be associated with the person concerned without being combined with other data stored in a different environment
PERSONAL HEALTH DATA	All kinds of information regarding the physical and mental health of an identified or identifiable natural person and information about the health services provided to the person
PERSONAL DATA	Any information relating to an identified or identifiable natural person
ANONYMIZATION OF PERSONAL DATA	Personal data cannot be associated with an identified or identifiable natural person under any circumstances, even by matching with other data

PROCESSING OF PERSONAL DATA	All kinds of operations performed on personal data, such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system
DELETION OF PERSONAL DATA	Deletion of personal data; making personal data inaccessible and non-reusable in any way for the Relevant Users
DESTRUCTION OF PERSONAL DATA	The process of making personal data inaccessible, irretrievable and non-reusable by anyone in any way
FOUNDATION	Personal Data Protection Board
PERSONAL DATA OF SPECIAL NATURE	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
PERIODIC DISPOSAL	In the event that all of the conditions for processing personal data specified in the Law disappear, the deletion, destruction or anonymization process to be carried out ex officio at recurring intervals specified in the personal data storage and destruction policy
DATA OWNER / DATA SUBJECT	The natural person whose personal data is processed
DATA RESPONSIBLE	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system

2. PERSONAL DATA PROTECTION ISSUES

2.1. Ensuring the Security of Personal Data

Niyazi Altıntoprak takes the necessary measures stipulated in Article 12 of the Law, depending on the nature of the data, to prevent unlawful disclosure, access, transfer or other security problems that may arise in other ways. Niyazi Altıntoprak takes measures and conducts audits to ensure the necessary level of personal data security in accordance with the guidelines published by the Personal Data Protection Implementation Unit.

2.2. Protection of Sensitive Personal Data

Measures taken for the protection of data on race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade

unions, health, sexual life, criminal convictions, security measures and biometric and genetic data of individuals, which are of a private nature, are carefully implemented and necessary audits are carried out.

Detailed information on the processing of sensitive personal data is provided in Article 3.3 of the Policy.

2.3. Raising Awareness on Protection and Processing of Personal Data

Niyazi Altintoprak provides the necessary trainings to those concerned in order to ensure that personal data is processed and accessed in accordance with the law, and to raise awareness about the protection of data and the exercise of rights.

Niyazi Altintoprak establishes the necessary business processes to increase the awareness of employees on the protection of personal data and receives support from consultants if needed. Deficiencies encountered in practice and the results of trainings are evaluated by Niyazi Altintoprak management. New trainings can be organized if needed depending on these evaluations and changes in the relevant legislation.

3. PROCESSING OF PERSONAL DATA

3.1. Processing Personal Data in Compliance with the Legislation

Niyazi Altintoprak processes personal data in accordance with the legislation in line with the principles listed below.

i. Processing in accordance with the Law and Honesty

Personal data are processed to the extent required by the fields of business activities, limited to these, in a manner that does not harm the fundamental rights and freedoms of individuals, in accordance with the general rule of trust and honesty.

ii. Ensuring that Personal Data is Up-to-date and Accurate

Necessary measures are taken and systems are operated to keep the processed personal data up-to-date and accurate.

iii. Processing for Specific, Explicit and Legitimate Purposes

In the business activities carried out by Niyazi Altintoprak, personal data are processed depending on the legitimate purposes determined and explained..

iv. Being relevant, limited and proportionate to the purpose for which they are processed

Niyazi Altintoprak collects personal data to the extent and quality required by business activities, and is processed in a limited manner depending on the specified purposes.

v. Preservation for as Long as Necessary

It is kept for the minimum period stipulated in the relevant legislation and required for the purpose of processing personal data. First of all, if a period of time is stipulated in the relevant legislation for the storage of personal data, it is kept for this period; if not, personal data are kept for the period required for the purpose for which they are processed. At the end of the retention periods, personal data are destroyed by appropriate methods (deletion, destruction or anonymization) in accordance with periodic destruction periods or data subject application.

3.2. Terms of Processing of Personal Data

Except for the explicit consent of the personal data owner, personal data processing activity may occur based on only one or more than one of the following conditions. Processing of special categories of

personal data is based on the conditions regulated in Article 3.3 of the Policy (Processing of Special Categories of Personal Data).

i. Explicit Consent of the Personal Data Owner

Processing of personal data is done with the explicit consent of the data subject. Explicit consent of the personal data owner: It is realized by informing him/her on a specific subject and obtaining his/her free will. If any of the conditions listed below are present, personal data may be processed without the explicit consent of the data subject.

a. Explicitly Regulated in Laws

In the event that there is a clear regulation in the laws regarding the processing of personal data, personal data may be processed without the consent of the data subject.

b. Failure to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to express their consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect his or another person's life or physical integrity.

c. Direct Relevance to the Establishment or Performance of the Contract

If the processing of personal data is directly related to the conclusion or performance of a contract to which the data subject is a party, the personal data of the data subject may be processed.

d. Niyazi Altintoprak's Fulfillment of his Legal Obligation

While Niyazi Altintoprak fulfills its legal obligations, personal data of the data subject may be processed if personal data processing is mandatory.

e. Publicization of Personal Data by the Personal Data Owner

Personal data belonging to data subjects who publicize their personal data may be processed limited to the purpose of publicization.

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

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data subject may be processed.

g. Mandatory Data Processing for Niyazi Altintoprak's Legitimate Interest

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of Niyazi Altintoprak.

3.3. Processing of Sensitive Personal Data

i. Processing of Sensitive Personal Data

When processing personal data of special nature, it processes it in accordance with the principles set out in the Law and Policy, by taking all necessary administrative and technical measures with the methods to be determined by the Board, under the following conditions:

- a.** Sensitive personal data other than health and sexual life may be processed without the explicit consent of the data subject if there is an explicit provision in the laws regarding its processing. In cases not explicitly stipulated in the laws, the explicit consent of the data subject shall be obtained.
- b.** Sensitive personal data relating to health and sexual life may be processed by persons or authorized institutions and organizations under the obligation of confidentiality: for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the data subject. Otherwise, the explicit consent of the data subject shall be obtained.

ii. Principles of Processing of Health Personal Data

- a.* No one shall be compelled to provide or show a transcript of past health data, except as necessary for the provision of health care.
- b.* Necessary physical, technical and administrative measures shall be taken to prevent the presence of unauthorized persons in sections such as counters, counters and desks and to prevent those who receive services in close proximity at the same time from hearing, seeing, learning or obtaining each other's personal data.
- c.* It shall apply the necessary partial de-identification or masking measures on the printed material containing the patient's personal health data, such as the results of tests and examinations, and shall take other measures to make it difficult to identify the material in case it falls into the hands of unauthorized persons.

iii. Access to data by health personnel

- a.* Persons in charge of health service delivery may access the health data of the person concerned, provided that it is limited to the necessity of the health service to be provided.
- b.* The health data of people who have an e-Nabız account are accessed in accordance with their privacy preferences. Data subjects are informed in detail about their privacy preferences and their consequences. The Ministry of Health shall not be responsible for any disruptions and damages that may occur in the provision of health services due to privacy preferences and inability to view past health data.
- c.* The health data of persons who do not have an e-Nabız account can only be accessed by the family physician to whom the person is registered without any time limit, limited to the exceptional purposes specified in the third paragraph of Article 6 of the Law.
- d.* The health data of persons who do not have an e-Nabız account can only be accessed by the family physician to whom the person is registered without any time limit, limited to the exceptional purposes specified in the third paragraph of Article 6 of the Law;
 - Without any time limit by the family physician to whom the person is registered,
 - By the physician with whom the person has made an appointment to receive health care services, provided that it is limited to the day of the appointment and until the procedures directly related to the health service received are completed,
 - By the physicians working in the health service provider where the person enters to receive health care, provided that it is limited to a period of twenty-four hours,
 - It can be accessed by physicians working in the health service provider where the patient is hospitalized until the patient is discharged from the health service provider.
- e.* Persons who do not want their past health data to be accessed by anyone are offered the relevant privacy preference via e-Nabız. The past health data of people who use this privacy preference can only be accessed if the code to be sent to the phone number declared by the person himself/herself is shared with the physician and entered into the system by the physician.
- f.* Personal health data with a higher level of privacy, which, if seen and known by others, may have a risk of negatively affecting the social life and mental health of individuals, shall be determined by the Ministry of Health and proportionate restrictions may be imposed on the access of health personnel to such data.

iv. Access to children's health data

Parents can access their children's health records through e-Nabız without the need for consent. Children with the power of discernment may authorize their parents' access to their health history through e-Nabız.

In case of divorce of the parents, the party who does not retain the right of custody may access the health data of the child in accordance with the legislation on the protection of personal data and within the limits determined by the General Directorate, taking into account the benefit of the child and the parent.

v. Patient relatives' access to health data

In sharing personal health data with patients' relatives, the third paragraph of Article 18 of the Patient Rights Regulation published in the Official Gazette dated 1/8/1998 and numbered 23420 shall be complied with in a manner that does not contradict the principles of the Law.

vi. Lawyers' access to health data

Lawyers cannot request their client's health data with a general power of attorney. The power of attorney issued for the transfer of the health data of the client to the lawyer must contain a special provision indicating the explicit consent of the person concerned regarding the processing and transfer of sensitive personal data.

vii. Access to health data of the deceased

The legal heirs of a deceased person are individually authorized to receive the health data of a deceased person by submitting a certificate of inheritance.

The health data of a deceased person shall be kept for at least 20 years.

ix. Correction of personal health data

If the provincial health directorate, upon the request of the person concerned, concludes that the health data was created by mistake in the research to be conducted by the health service provider and if it is corrected by the General Directorate of Health Information Systems, the same correction is made in the database of the Niyazi Altintoprak provider. The Directorate General determines the date by which health data created by health service providers can be corrected by them and updates this date according to the need. Health data created after this date determined by the Directorate General shall be corrected by the relevant health service provider; health data created before this date shall be corrected by the Directorate General upon the request of the relevant provincial Health Directorate.

x. Processing of Personal Health Data for scientific purposes

Within the scope of subparagraph (b) of the first paragraph of Article 28 of the Law, scientific studies can be conducted with personal health data anonymized by the data controller.

Within the scope of subparagraph (c) of the first paragraph of Article 28 of the Law, personal health data may be processed for scientific purposes within the framework of technical and administrative measures to be taken, provided that they do not violate the privacy or personal rights of the data subjects or constitute a crime.

3.4. Enlightening the Personal Data Owner

Niyazi Altintoprak informs personal data owners in accordance with the relevant legislation on the purposes for which their personal data is processed, with whom it is shared for what purposes, with whom it is shared, by which methods it is collected, its legal reason and the rights of data owners in the processing of their personal data. In this respect, the protection of personal data is carried out in accordance with other policy documents and clarification texts prepared within the framework of the principles in the Policy.

3.5. Transfer of Personal Data

Niyazi Altintoprak may transfer personal data and sensitive personal data to third parties (third party companies, group companies, third real persons) in accordance with the law by taking the necessary security measures in line with the purposes of personal data processing. Niyazi Altintoprak carries out the transactions in accordance with "ANNEX 4- Third Parties to whom Personal Data are Transferred and the Purposes of Transfer" annexed to the Policy in order to carry out the transfer transactions in accordance with the regulations stipulated in Article 8 of the Law.

i. Transfer of Personal Data

Although the explicit consent of the personal data owner is required for the transfer of personal data, personal data may be transferred to third parties based on one or more of the following

conditions, by taking all necessary security measures, including the methods stipulated by the Board.

- It is expressly provided for in the law,
- It is directly related to and necessary for the conclusion or performance of a contract,
- It is necessary for Niyazi Altıntoprak to fulfill his legal obligation,
- Limited to the purpose of publicization, provided that the personal data has been made public by the data subject,
- It is mandatory for the establishment, use or protection of the rights of Niyazi Altıntoprak or the data subject or third parties,
- It is mandatory to ensure the legitimate interests of Niyazi Altıntoprak, provided that it does not harm the fundamental rights and freedoms of the data owner,
- It is necessary for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

Personal data subject to any of the above-mentioned conditions may be transferred to foreign countries that are declared by the Board to have adequate protection as "Foreign Country with Adequate Protection". Personal data may be transferred to those in the status of "Foreign Country with a Data Controller Committing to Adequate Protection", where the data controllers in Turkey and foreign countries, where there is no adequate protection, undertake an adequate protection in writing and where the Board has permission, according to the conditions stipulated in the legislation.

ii. Transfer of Sensitive Personal Data

Sensitive personal data may be transferred under the following conditions by taking all necessary administrative and technical measures, including the methods to be determined by the Board, in accordance with the principles set out in the Policy:

- a.* Sensitive personal data other than health and sexual life, without seeking the explicit consent of the data subject in case there is an explicit provision in the laws regarding the processing of personal data, otherwise, in case the explicit consent of the data subject is obtained.
- b.* Sensitive personal data related to health and sexual life, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorized institutions and organizations under the obligation of confidentiality, without seeking explicit consent, otherwise, if the explicit consent of the data subject is obtained.

Personal data may be transferred to those in the status of "**Foreign Country with Adequate Protection**" in the presence of any of the above conditions, and in the absence of adequate protection, personal data may be transferred to those in the status of "**Foreign Country where the Data Controller Committed to Adequate Protection**" according to the data transfer conditions regulated in the legislation.

4. CATEGORIZATION OF PROCESSED PERSONAL DATA AND PURPOSES OF PROCESSING

The purpose of Niyazi Altıntoprak in processing personal data is to inform the relevant persons in accordance with Article 10 of the Law and other legislation, based on and limited to at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, in accordance with the general principles specified in the Law, especially the principles specified in Article 4 of the Law regarding the processing of personal data.

Examination business processes are carried out as administrative affairs (Patient Reception, Security, Archive/Registration, Personnel, Accounting-Finance, Purchasing, Occupational Health and Safety, IT, Patient Rights), health services (Health Services, Emergency Services, Infection Control Services).

Patient data Carrying out information security processes, carrying out activities in accordance with the legislation, carrying out financial and accounting affairs, carrying out company / product / service loyalty processes, following and carrying out legal affairs, carrying out communication activities, carrying out / auditing business activities, carrying out business continuity activities, carrying out goods / service procurement processes, storage and archive activities, conducting marketing processes of products/services, providing information to authorized persons, institutions and organizations, providing health services, creating and tracking appointment records, issuing prescriptions, conducting activities related to patient satisfaction, providing support and information after health services, and conducting risk management processes. Data on patients are obtained through the website, e-mail and telephone.

The information of suppliers providing goods/services is recorded in order to check whether they fulfill their obligations and to ensure that the services provided are carried out in accordance with the suppliers. Personal data of suppliers are obtained through e-mails sent and received as a result of communication with them, phone calls, business cards and information on the website.

The personal data of the employees are requested and processed in order to complete the documents required to be included in the personnel file within the scope of the SGK registration, the Labor Law in force, the Occupational Health and Safety Law practices.

Employee candidate personal data are obtained through the curriculum vitae they submit during recruitment and job application, job application forms, resume viewing methods offered by human resources software programs (such as Kariyer.net, LinkedIn) that provide candidate pool services, and the answers they give to the questions asked to them during the oral exam and answered with their consent. Niyazi Altıntoprak requests and processes personal data from job applicants in order to communicate for the oral exam during the recruitment process and to determine whether the candidate's qualifications and experience are compatible with the open position.

Niyazi Altıntoprak records the data of the employees and authorized natural persons of the business partners with whom it cooperates within the framework of the purposes of establishment of the business partnership.

The information contained in the complaint and request form received by Niyazi Altıntoprak is processed in order to ensure service quality.

Detailed information on the categories of personal data processed is available in the document "Annex 3- Personal Data Categories" attached to the Policy; detailed information on the purposes of personal data processing is available in the document "Annex 1- Personal Data Processing Purposes" attached to the Policy. The purposes of processing according to the data categories and the details of the data subject groups can be found in the field of Niyazi Altıntoprak at <https://verbis.kvkk.gov.tr/>.

5. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA

Niyazi Altıntoprak takes the necessary technical and administrative measures to prevent unlawful processing of personal data, to prevent unlawful access to data and to ensure the preservation of data, and in this context, it conducts or has the necessary training and awareness raising and audits.

6. STORAGE AND DESTRUCTION OF PERSONAL DATA

Niyazi Altıntoprak carries out the storage and destruction of data in accordance with the procedures and principles regulated by the "Personal Data Storage and Destruction Policy" annexed to the Policy. Personal data are kept for the period required for the purpose of processing. First of all, if a period is

determined in the aforementioned Policy, it is in accordance with this period; If not determined, it stores personal data for the legal period, and if it is not stipulated in the legal period, it stores personal data for the period required for the purpose of processing personal data. Personal data shall be destroyed at the end of the specified storage periods, in accordance with the periodic destruction periods or the data owner's application, by the specified method (deletion, destruction or anonymization).

7. RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS

7.1. Rights of the Personal Data Owner

Personal data subjects have the following rights:

- i.* To learn whether personal data is being processed,
- ii.* Request information if personal data has been processed,
- iii.* To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- iv.* To know the third parties to whom personal data are transferred domestically or abroad,
- v.* To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- vi.* Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- vii.* To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- viii.* In case of damage due to unlawful processing of personal data, to demand the compensation of the damage.

7.2. Exercising the Rights of the Personal Data Owner

Personal data owners can apply for their requests regarding their rights listed in Article 6.1. by filling out the "Data Owner Application Form" (Annex-6) available at Niyazi Altintoprak.

7.3. Responding to Applications

Niyazi Altintoprak finalizes the applications made by the personal data owner in accordance with the Law and other legislation. Requests duly submitted to Niyazi Altintoprak shall be finalized free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

7.4. Rejection of Personal Data Owner Application

Niyazi Altintoprak may reject the application of the applicant by explaining the grounds in the following cases:

- i.* Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics,
- ii.* Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public

- security, public safety, public order, economic security, privacy of private life or personal rights or does not constitute a crime,
- iii.* Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security,
 - iv.* Processing of personal data by judicial or enforcement authorities in relation to investigations, prosecutions, trials or executions,
 - v.* Processing of personal data is necessary for the prevention of crime or criminal investigation,
 - vi.* Processing of personal data made public by the personal data subject himself/herself,
 - vii.* Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by the law,
 - viii.* Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters,
 - ix.* The request of the personal data subject is likely to impede the rights and freedoms of other persons,
 - x.* Demands were made that required disproportionate effort,
 - xi.* The requested information is publicly available.

8. EXECUTION

The Policy has been approved by Op. Dr. Niyazi Atıntoprak. The technical execution of the Policy is provided by the "Personal Data Storage and Destruction Policy" (Annex-5). The Board of Directors is responsible for the execution of the Law and the Policy and updating it when necessary, and Op. Dr. Niyazi Atıntoprak is responsible for the follow-up, coordination and supervision of all works and transactions within this scope.

In business processes, the execution of the Policy before the parties "Patient Clarification Text and Explicit Consent Declaration" (Annex-7), "Supplier Confidentiality and Personal Data Protection Agreement" (Annex-8) "Employee Clarification Text and Explicit Consent Declaration" (Annex-9), "Employee Candidate Clarification Text and Explicit Consent Declaration" (Annex-10), "Website Cookie Clarification Text" (Annex-11).

9. EFFECTIVENESS AND PUBLICITY

The Policy has entered into force as of the date of publication. Changes in the Policy shall be published on Niyazi Altıntoprak's website (www.niyazialtintoprak.com) and made available to personal data owners and relevant persons. Policy changes enter into force on the date of announcement.

APPENDICES

Annex 1 - Personal Data Subjects

Annex 2 - Categories of Personal Data

Annex 3 - Purposes of Processing Personal Data

Annex 4 - Third Parties to whom Personal Data are Transferred and Purposes of Transfer

Annex 5 - Personal Data Storage and Destruction Policy

Annex 6 - Data Subject Application Form

Annex 7 - Patient Clarification Text and Explicit Consent Declaration

Annex 8 - Supplier Confidentiality Undertaking, Supplier Clarification Text and Explicit Consent Declaration

Annex 9 - Employee Clarification Text and Explicit Consent Declaration

Annex 10 - Employee Candidate Clarification Text and Explicit Consent Declaration

Annex 11 - Website Cookie Clarification Text

Annex 1 – Personal Data Subjects

CATEGORIES	EXPLANATION
Personal data owner	All members of the health professions who participate in the provision of health services and the person who participates responsibly in the provision of health services even if he/she is not a member of the health professions
Employee	A person, including an internship candidate, who has applied for a job or has opened relevant information such as CV etc. to the review of Niyazi Altintoprak
Candidate	People in need of health services
Patient	Natural persons, including, but not limited to, shareholders and officials of these businesses, working in businesses (business partners, suppliers, etc., but not limited to) with which Niyazi Altintoprak has all kinds of business partner and supplier relationships

Annex 2 - Categories of Personal Data

Data Categories	Personal Data
Identity	Name, Surname
	Father Name
	Marital Status
	Identity Card Serial Number
	TR Identity No
	Passport Number
	Temporary TR Identity Number
	Gender Information
	Turkish Identity Card
Contact	Address
	E Mail Address
	Contact Address
	Telephone No
Personnel	Payroll Information
	Disciplinary Investigation
	Employment Entry-Exit Document Records
	Curriculum Vitae Information
Legal Action	Correspondence with judicial authorities, information in the case file, etc.
Patient Process	Invoice
	Appointment Information
Transaction Security Information	Transaction Security (such as IP address information, website login and exit information, password and password information)
	IP Address Information

	Website Login and Logout Information
	Password and Passcode Information
Risk Management	Information processed for the management of commercial, technical, administrative risks, such as
Finance	Bank Account Number
	IBAN Number
Professional Experience	Diploma Information
	Courses Attended
	On-the-Job Training Information
	Certificates
Information	Patient History Information
	Cookie Registrations
Audio and Visual Recordings	Closed Circuit Camera System Video, Audio Recording
Dress and Attire	information on dress and attire
Foundation Membership	such as foundation membership information
Health Information	Information on Disability Status
	Blood Type Information
	Personal Health Information
	Device and Prosthesis Information
	Laboratory and Imaging Results
	Test Results
	Inspection Data
	Prescription Information
Information on Sexual Life	
Sexual Life	Information on sexual life, etc.
Criminal Conviction and Security Measures	Information on criminal convictions
	Information on Security Measure
Genetic Data	Genetic data etc.
Family Information	Number of Children
	Family Wallet
	Spouse Employment Information
	Child Education and Age Information
Occupation Data	Mode of Operation
	Profession
	Last Employed Company Information
	Occupation Card Information
	Reference Information
Website Usage Data	Frequency/Times of Login to the Site
	Last Login Date
	IP Address

Audit and Inspection Information	Personal data processed during internal or external audit activities of the hospital
Procurement Process	Examination, Analysis and Radiology Information
	Medication Information
Forensic Case Information	Health information related to an event-related loss

Annex 3 – Purposes of Processing Personal Data

Execution of Emergency Management Processes
Execution of Information Security Processes
Execution of Employee Candidate Application Processes
Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
Execution of Fringe Benefits and Benefits Processes for Employees
Conducting Training Activities
Execution of Access Authorizations
Execution of Activities in Compliance with the Legislation
Execution of Finance and Accounting Affairs
Ensuring Physical Space Security
Execution of Assignment Processes
Monitoring and Execution of Legal Affairs
Execution of Communication Activities
Execution / Supervision of Business Activities
Execution of Occupational Health / Safety Activities
Execution of Business Continuity Ensuring Activities
Execution of Goods / Service Procurement Processes
Execution of Risk Management Processes
Execution of Storage and Archive Activities
Execution of Contract Processes
Execution of Wage Policy
Ensuring the Security of Data Controller Operations
Providing Information to Authorized Persons, Institutions and Organizations
Provision of Health Services
Creating and Tracking Appointment Records
Prescription Issuance
Execution of Activities Related to Patient Satisfaction
Providing Support and Information After Health Care Services

Annex 4 - Third Parties to whom Personal Data are Transferred and Purposes of Transfer

In accordance with Articles 8 and 9 of the Law, Niyazi Altintoprak may transfer the personal data of participants, customers and employees to the following categories of persons:

Persons to whom data can be transferred	Definition	Purpose and Scope of Data Transfer
Supplier	A person or organization that provides a product, material or service	Limited to the purpose of outsourcing the supply of products, materials and services to fulfill business activities
Natural persons or private legal entities	Real persons or legal entities with whom Niyazi Altintoprak is in contact and with whom he has transactions due to his activities	Limited to the work and transaction performed
Public institutions and organizations	Public institutions and organizations authorized to receive information and documents from Niyazi Altintoprak in accordance with the provisions of the relevant legislation such as Social Security Institution, Tax Offices, etc.	Limited to the purpose requested by the relevant public institutions and organizations subject to their legal authority