



M.İHSAN ARSLAN VAKFI İKTİSADİ İŞLETMESİ
PERSONAL DATA PROTECTION, PROCESSING AND
DISPOSAL POLICY



M. İHSAN ARSLAN VAKFI KURULUŞUDUR



As M.İhsan Arslan Vakfı İktisadi İşletmesi, our main goal is to continue to be the first choice of our guests with the vision of being an exemplary, always preferred pioneer with the mission of providing patient satisfaction-oriented, reliable, friendly, high quality service at the highest level of technology and to carry our institutional presence to the future in continuous improvement. We are aware that compliance with legislation and best practices in administrative issues is at least as important as success in our main fields of activity in order to realise this fundamental objective, which is more of a continuous process than a single goal to be achieved.

The processing of personal data of our personnel, patients, suppliers and all stakeholders with whom we have a relationship in accordance with the law is not only required by the legislation, but also undoubtedly has an important place in terms of compliance with best management practices.

In this context, we ensure that a comprehensive and systematic policy document regarding the personal data we collect and process during our activities is prepared and placed among the management documents of our Foundation, and that mutual trust, effective communication and teamwork are maintained with all our solution partners, from our staff to our suppliers.

We have prepared the Policy on Processing, Protection and Destruction of Personal Data in our Foundation within the framework of the Law No. 6698 on the Protection of Personal Data and the relevant secondary regulations.

We have implemented the necessary certification system by completing the procedures for the processing of personal data, through which we fulfil our legal obligations arising from the Law on the Protection of Personal Data and related legislation.

In addition to all these, we will continue to fulfil our duty by keeping this policy text, which is an important component of our Foundation's personal data processing policy, up-to-date by periodically reviewing it depending on the developments and needs in the legislation.

With Regards

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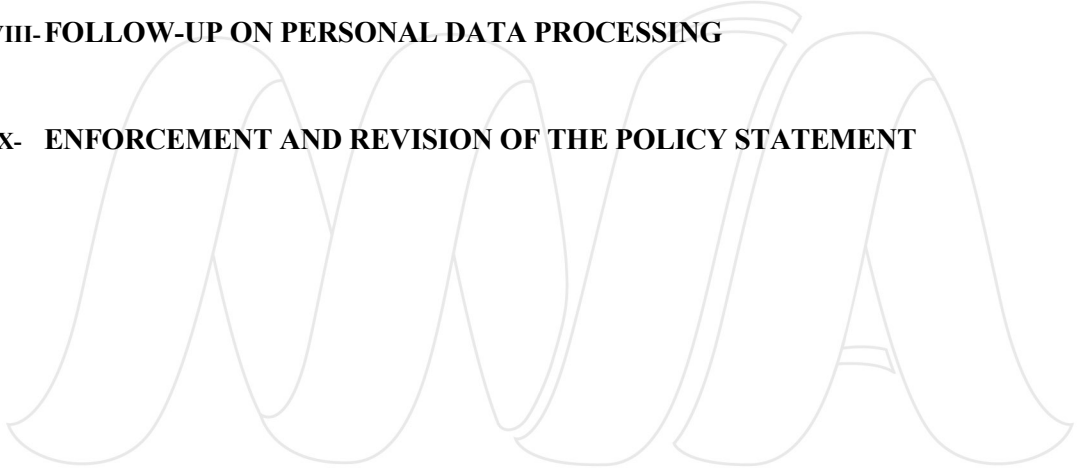
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I- OUR FOUNDATION

The M. İhsan Arslan Vakfı İktisadi İşletmesi ("Foundation", "our Foundation"), which aims to carry out healthcare services of international quality in Turkey, established our centre in İncek, which has a serene and peaceful atmosphere in terms of its ecological structure, has the best environmental conditions for our guests who want to spend a certain period of their lives in comfort and receive treatment. It is located in an area of 38.000 square metres. It has all physical facilities with a total closed area of 25,000 square metres.

Our guests both receive the services they need and live in a comfortable and peaceful environment. With a multidisciplinary approach, our guests who stay permanently in the Nursing Home and Elderly Care Centre and Special Care Centre for the Persons with Disabilities can receive all medical treatments other than surgery, and at the same time, they receive the treatment appropriate to their needs with the best specialists in the Physical Therapy and Rehabilitation section with state-of-the-art facilities.

II- GENERAL STATEMENT OF POLICY ON PROCESSING, PROTECTION AND DISPOSAL OF PERSONAL DATA

Our Foundation's Personal Data Processing, Storage and Destruction Policy Text ("Policy Text") aims to:

Fulfil the legal obligations arising from the Law on the Protection of Personal Data ("KVKK") and related legislation,
Implement the envisaged practices regarding the processing of personal data,
Create in-house awareness on the processing of personal data and to ensure its continuity.

a. Objectives of the Policy Statement

The Policy Statement sets out the management approach in our Foundation within the framework of the law on the protection of personal data; in this context, the rights and obligations of our Foundation, staff, patients / relatives, suppliers, employees and other relevant persons regarding personal data, the work and transactions to be carried out by our Foundation in this regard, and the principles of exercising the rights of the relevant persons in a collective, consistent and systematic manner.

The Policy Statement has been prepared to fulfil the following objectives:

1. Fulfilment of the obligation under the KVKK and the relevant legislation,
2. To collectively set out our Foundation's approach to the processing and protection of personal data,
3. Establishing a guide on the processing of personal data that our Foundation will encounter during the conduct of its activities,
4. Making the processing and protection of personal data part of the management of the Foundation,
5. Introducing an arrangement for updating these principles, which have become part of the management of the Foundation, in order to adapt them to changes and new developments.

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b. Technical Definitions

The legal expressions in this Policy Statement are used in the scope and content in which they are used in KVKK and related legislation.

c. Principles

This Policy Statement has been prepared in accordance with the following 5 principles in Article 4/2 of the KVKK regarding personal data:

Compliance with the law and good faith,

Accuracy and timeliness,

Processing for specific, explicit and legitimate purposes,

Processing data in connection with the purpose for which they are processed, in a limited and measured manner,

Processing limited to the period stipulated by the provisions of the legislation or required by the purpose of processing.

Our Foundation bases its practices regarding the processing of personal data on the legislation and these 5 principles. Especially in cases where the legislation is not explicit or in cases where there is hesitation in practice, our Foundation will direct its practice within the framework of these principles after conducting the necessary inquiries and research with the necessary due diligence that is possible under the circumstances.

The Personal Data Storage and Destruction Policy Statement, which is included in the management documents of our Foundation, is a statement that sets out the maximum period of time required for the purpose for which personal data are processed and the policy underlying the deletion, destruction and anonymisation process, and is a complement to this Policy Statement.

The principles regarding this statement, which we will briefly call the destruction policy statement, are as follows:

When there are no longer any requirements for processing personal data, personal data shall be destroyed ex officio or upon the request of the data subject.

The principles set out in Article 5 of the KVKK, other relevant legislation provisions and the principles set out in the destruction policy text are complied with regarding the destruction of personal data.

All transactions regarding the destruction of personal data are recorded and these records are kept for at least three years.

Unless otherwise stipulated regarding the method of destruction of personal data, our Foundation chooses the most appropriate method, taking into account the request of the person concerned, if any, and explains the reasons.

III- CONDITIONS OF PROCESSING PERSONAL DATA

a. Conditions of Processing Personal Data

Our Foundation will process the personal data it stores in accordance with the following conditions set out in Article 5 of the KVKK:



1. As a rule, personal data collected by our Foundation are processed with the explicit consent of the data subject. Personal data held by our Foundation may be processed even without the explicit consent of the data subject, in the following cases listed in Article 5/2 of the KVKK.
 - a. It is explicitly stipulated in the laws.
 - b. Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data belonging to the parties to the contract.
 - c. It is mandatory for our Foundation to fulfil its legal obligations.
 - d. Data processing is mandatory for the establishment, exercise or protection of a right.
 - e. Data processing is mandatory for the legitimate interests of our Foundation, provided that it does not harm the fundamental rights and freedoms of the person concerned.

In Article 5/2 of the KVKK, it is stated that personal data may be processed even without explicit consent in the event that it is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual incapability or whose consent is not legally valid (Art.5/2.b) and if the personal data is made public by the person concerned (Art.5/2.d). These two conditions are more general and more comprehensive than the other conditions, and considering the fields of activity of our Foundation, the personal data it collects and the way it processes them, it should be noted that these two conditions may be included in the conditions for the processing of personal data by our Foundation, albeit in exceptional cases, even without explicit consent.

b. Conditions of Processing of Special Categories of Personal Data

In Article 6/1 of the KVKK, special categories of personal data are listed as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal record and security measures, and biometric and genetic data.

Explicit consent of the person concerned is required for the processing of special categories of personal data. However, in the following cases, special categories of personal data may be processed by our Foundation without seeking explicit consent:

1. In cases stipulated by law in the case of personal data other than health and sexual life,
2. In the case of personal data relating to health and sexual life, only for the protection of public health, to provide preventive medicine, medical diagnosis, treatment and care services, to plan and manage health services and financing, and by persons or authorised institutions and organisations under the obligation of confidentiality.

Since the main activity of our Foundation is to process data related to health, the decisions taken by the Personal Data Protection Board and the rules determined by the Ministry of Health are complied with to the maximum extent in the processing of this data, and sensitivity is shown in taking the necessary administrative and technical measures to protect personal data of special nature.

IV- ESSENTIAL INFORMATION RELATED TO PERSONAL DATA PROCESSED BY OUR FOUNDATION

information in this section is based on the Data Inventory of our Foundation, which is registered in the Data Controllers Registry Information System within the scope of KVKK for the personal data processed by our Foundation.



a. Categories of Personal Data Collected

Our Foundation collects personal data under the following 13 categories.

1) Identity Information

Personal data falling under the category of Identity Information are collected and processed extensively by our Foundation for a wide variety of purposes. Identity information data of employee candidates and references, employees, employee relatives, employee contact persons, patients, patient candidates, patient relatives, visitors, managers, officials or employees of suppliers are collected and processed by our Foundation.

Purposes of processing Identity Information data: Carrying out emergency management processes, carrying out access authorisations, creating patient registration information and carrying out activities in accordance with the legislation, carrying out information security processes, carrying out the application processes of employee candidates, fulfilling the obligations arising from the employment contract and legislation for employees, carrying out the processes of fringe benefits and benefits for employees, carrying out access authorisations, carrying out activities in accordance with the legislation, carrying out financial and accounting affairs, monitoring and carrying out legal affairs, carrying out communication activities, carrying out/supervising business activities, carrying out occupational health/safety activities, carrying out after-sales support services for goods/services, carrying out advertising/campaign/promotion processes, carrying out procurement processes for goods/services, carrying out sales processes for goods/services, providing information to authorised persons, institutions and organisations, planning, supervision and execution of information security processes, ensuring compliance with the legislation on quality standards in health, carrying out training activities.

2) Contact Information

Personal data in the contact information category are personal data directly required for the continuation of the activities of our Foundation. This information must be reliable and up-to-date. These data belonging to employee candidate and reference, employee, employee relatives and contact person, patient / patient relatives, supplier or customer representative, manager, official or employee are collected and processed for various purposes during the activities of our Foundation.

The purposes of processing contact information: Creating patient registration information and carrying out activities in accordance with the legislation, carrying out the application processes of employee candidates, fulfilling the obligations arising from the employment contract and legislation for employees, carrying out emergency management processes, carrying out employee candidate/intern/student selection and placement processes, carrying out activities in accordance with the legislation, carrying out occupational health/safety activities, carrying out procurement processes of goods/services, carrying out sales processes of goods/services, carrying out financial and accounting affairs, carrying out contract processes, providing information to authorised persons, institutions and organisations, carrying out/supervising business activities, carrying out advertising/campaign/promotion processes, carrying out activities for customer satisfaction and planning, supervision and execution of information security processes.



3) Information regarding Process Security

In our Foundation, wireless access to the internet is provided to staff, patients, patients' relatives and visitors. In addition, due to process security, the internet login and logout information of our personnel is kept. Mobile phone numbers, IP addresses, internet login and exit information, name, surname, information of our employees and other relevant persons using this service are collected and processed for the purpose of planning, supervision and execution of information security processes and execution of access authorisations.

4) Information regarding Security of the Premises

In order to ensure the security of the premises of our Foundation, the personal data of all persons who appear in these areas are collected through the existing camera security system at the entrances and exits of the building and on the floors within the building.

5) Financial Information

Ensuring that payments continue in a predictable and uninterrupted manner during commercial activity is the most important factor for the sustainability of business. Our Foundation collects and processes financial information from its employees, patients and suppliers. Our Foundation uses this financial information to fulfil the obligations arising from the employment contract and legislation for employees, to carry out fringe benefits and benefits processes, to carry out activities in accordance with the legislation, to carry out financial and accounting affairs, to carry out assignment processes, to carry out/ supervise business activities, to carry out goods/service sales processes.

6) Information regarding Legal Procedures

Information regarding the legal procedures of our employees is collected and processed in order for our Foundation to fulfil the obligations arising from the employment contract and legislation for our employees, to carry out activities in accordance with the legislation and to follow up and carry out legal affairs.

7) Biometric Information

Personal data falling under the category of Biometric Information are personal data of special nature. In our Foundation, fingerprint information and face scan information of our employees are collected and processed through the electronic tracking system in order to ensure the security of premises, to carry out and supervise business activities and to ensure business continuity and to maintain its activities. In addition, the palm information of our patients is also processed for the purposes of obligations arising from the legislation, the execution of business activities and the fulfilment of the sale of services.

The processing of personal information in this category is carried out with the legal justification to protect public health, to provide preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, or with the explicit consent of the data subject.



8) Information regarding Criminal Record and Security Measures

Personal data falling under the category of Criminal Record and Security Measures are personal data of special nature. In our Foundation, the information regarding the criminal record and security measures of our employees is physically collected and processed in order to fulfil the obligations arising from the employment contract and legislation for the employees, to carry out the processes of fringe benefits and interests, and to carry out the activities in accordance with the legislation. The explicit consent of the data subject is obtained for the processing of this category of personal information.

9) Information regarding Professional Experience

During the process of creating an employee candidate file, creating an employee personal file and conducting patient satisfaction surveys, the professional experience information of employee candidates, employees and patients of our Foundation is collected and processed for the purposes of providing information to authorised persons and institutions, carrying out the application processes of employee candidates, carrying out activities for customer satisfaction, and fulfilling the obligations arising from the employment contract and legislation for employees.

10) Visual Records

In our foundation, camera recordings of employees, patients/patient candidates, visitors are taken within the scope of carrying out training activities, taking call centre records and promoting our services and advertising activities.

11) Medical Information

Personal data falling under the category of Medical Information are personal data of special nature. Our Foundation processes data due to the provision of health services. Medical information of our patients, employees and employee candidates are collected and processed within our Foundation.

The purposes of collecting and processing health information in our Foundation can be listed as follows: carrying out activities in accordance with the legislation, carrying out/supervising business activities, carrying out occupational health/safety activities, carrying out goods/service sales processes, fulfilling the obligations arising from the employment contract and legislation for employees, carrying out fringe benefits and benefits processes for employees, carrying out the application processes of employee candidates, creating patient files and carrying out activities in accordance with the legislation, protecting public health, providing preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

12) Information regarding Customer Transactions

In our Foundation, information regarding customer transactions of our suppliers and patients is collected and processed in order to carry out invoicing activities.

13) Personal Information

Personal data of our employees are collected and processed in our Foundation. Personal data in a broad and important category such as personal data are naturally processed for many different purposes. These purposes are to fulfil the obligations arising from the employment contract and legislation for our employees, to carry out the processes of fringe benefits and benefits for our employees, to carry out our activities in accordance with the legislation, to carry out the financial and accounting affairs of our Foundation, to carry out the assignment processes during the continuation of our activities.

b. Methods of Collection of Personal Data

Our Foundation collects personal data by a total of 10 methods in 3 main medias:

- 1) Physical
 - a. Job application form
 - b. Forms prepared in accordance with health legislation and other forms
 - c. Signed contracts
- 2) Information Systems (Electronic)
 - a. Computer input
 - b. Through e-mail
 - c. Special programme (Bizmed HIS)
 - d. Electronic Tracking System
 - e. Website
- 3) CCTV

c. Owners of Collected Personal Data

The owners of the personal data collected by our Foundation are listed below:

- 1) Employee
- 2) Employee Candidate
- 3) Employee Candidate Reference
- 4) Employee Contact Person
- 5) Supplier Official/Employee
- 6) Patient/ Patient Relative/Potential Patient
- 7) Parent/Guardian
- 8) Visitor

d. Legal Basis for Processing the Collected Personal Data

Personal and special categories of personal data collected by our Foundation are processed on the basis of the following legal grounds among the conditions listed in Articles 5 and 6 of the KVKK. These are:

- 1) Explicit consent of the personal data subject.
- 2) It is clearly stipulated in the laws.
- 3) It is necessary to process the personal data in question, provided that it is directly related to the establishment or performance of a contract.
- 4) It is mandatory for our Foundation to fulfil its legal obligations.

- 5) Data processing is mandatory for the legitimate interests of our Foundation, provided that it does not harm the fundamental rights and freedoms of the personal data owner,
- 6) Protecting public health, providing preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

e. Purposes of Processing the Collected Personal Data

We deem it sufficient to list below only the personal data processing purposes of our Foundation, which we have associated with them under the personal data categories above:

- 1- Carrying out Emergency Management Processes
- 2- Carrying out Information Security Processes
- 3- Carrying out the Application Processes of Employee Candidates
- 4- Fulfilling Labour Contract and Legislative Obligations for Employees
- 5- Carrying out Training Activities
- 6- Regulating Access Authorisations
- 7- Carrying out activities in accordance with the legislation
- 8- Carrying out Finance and Accounting Affairs
- 9- Ensuring Security of Premises
- 10- Carrying out the Assignment Processes
- 11- Creation of Patient File and Execution of Activities in accordance with the Legislation
- 12- Monitoring and Carrying Out Legal Affairs
- 13- Carrying out communication activities
- 14- Carrying out Internal Audit/Investigation Activities,
- 15- Carrying out / Supervision of Business Activities
- 16- Carrying out Occupational Health and Safety Activities
- 17- Carrying out activities to ensure business continuity
- 18- Carrying out Goods / Services Purchasing / Sales Processes
- 19- Carrying out Advertisement / Campaign / Promotion Processes,
- 20- Ensuring Compliance with Health Quality Standards Legislation
- 21- Providing Information to Authorised Persons and Institutions

v- VAKFIMIZCA İŞLENEN KİŞİSEL VERİLERİN AKTARILMASI VE HUKUKİ DAYANAĞI

As detailed above, our Foundation collects personal data under 13 categories. The conditions of transfer of these personal data are as follows:

- a) No personal data processed by our Foundation is transferred abroad.

- b) Personal data other than special categories of personal data and special categories of personal data such as criminal record report, medical information/report, death report, disability status, fingerprints and resting reports of our employees and employee candidates are transferred only to our shareholders, legally authorised public and private institutions and consultants/auditors. The explicit consent required for the processing of special categories of personal data within this framework has been obtained from the data subjects.
- c) The medical data of our patients are shared with the Ministry of Health and the Social Security Institution, which are legally authorised public institutions, private health insurance companies and other health institutions from which we outsource services.

These personal data are transferred based on the following legal grounds of KVKK:

- 1- Article 5/1 of the Law: Obtaining Explicit Consent
- 2- Art. 5/2-a of the Law: Explicitly stipulated in the Law
- 3- Art. 5/2-c of the Law: Provided that it is directly related to the conclusion or performance of a contract, it is necessary to process the personal data of the parties to the contract
- 4- Art. 5/2-ç: Fulfilment of Legal Obligation
- 5- Art. 5/2-e of the Law: Data processing is mandatory for the establishment, exercise or protection of a right
- 6- Art. 5/2-f: Legitimate Interest of the Data Controller
- 7- Art. 6/3 of the Law: Protecting of Public Health, Providing Preventive Medicine, Medical Diagnosis, Treatment and Care Services, Planning and Management of Health Services and Financing
- 8- Art. 6/3 of the Law: Processing of Special Categories of Personal Data Other Than Health and Sexual Life Explicitly Stipulated by Laws

VI-STORAGE AND DESTRUCTION OF PERSONAL DATA PROCESSED BY OUR FOUNDATION

a) Storage of Personal Data

Our Foundation only processes personal data based on the existence of a legitimate ground for data processing. Our Foundation has prepared and accepted a Personal Data Storage and Destruction Policy in accordance with Article 5/1 of the Regulation on Deletion, Destruction or Anonymisation of Personal Data, which was issued by the KVKK in accordance with Article 7/3 of the KVKK and entered into force after being published in the Official Gazette dated 28/10/2017 and numbered 30224.

Personal data are stored by our Foundation for the following purposes within the limits set out by KVKK and other relevant legislation:

1. Protecting public health, providing preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing,
2. Sustainability of commercial activities,
3. Fulfilment of legal obligations,
4. Planning and execution of employee rights and fringe benefits and creation of personal files
5. Ability to manage customer relations,



6. Carrying out financial and accounting affairs.

Pursuant to Article 12 of the KVKK, our Foundation has taken the necessary technical and administrative measures to:

1. Prevent unlawful processing of personal data,
2. Prevent unlawful access to personal data,
3. Ensure the appropriate level of security for the protection of personal data.

Our Foundation ensures the security of the personal data it holds in accordance with the legislation and the requirements of the situation, mainly by determining a secure physical location, making appropriate authorisation principles operational and taking measures regarding personal data in electronic media.

These measures, which are classified under two categories as Administrative Measures and Technical Measures, are as follows:

a) Administrative Measures

- a. There are disciplinary regulations that include data security provisions for employees.
- b. Activities are carried out at regular intervals to raise awareness on data security for employees.
- c. An authorisation matrix has been established for employees.
- d. Confidentiality agreements are made.
- e. The authorisations of employees who change their duties or leave their jobs are removed.
- f. Extra security measures are taken for personal data transferred via paper and the relevant document is sent in confidentiality-grade document format.
- g. data security policies and procedures have been determined.
- h. Personal data security issues are reported quickly.
- i. Personal data security is monitored.
- j. Necessary security measures are taken regarding entry and exit to physical environments containing personal data.
- k. Physical environments containing personal data are secured against external risks (fire, flood, etc.).
- l. The security of environments containing personal data is ensured.
- m. Protocols and procedures for the security of special categories of personal data have been determined and implemented.
- n. Existing risks and threats have been identified.
- o. Awareness of data processing service providers on data security is ensured.

b) Technical Measures

- a. Network security is ensured.
- b. Access logs are kept regularly.
- c. Internal anti-virus systems are used in the Operating System.
- d. Firewalls are used.
- e. Personal data is backed up and the security of backed up personal data is also ensured.
- f. User account management and authorisation control system is implemented and these are also monitored.
- g. Log records are kept without user intervention.
- h. Periodic authorisation checks are carried out.

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- i. Encryption is performed.
- j. The users who are authorised to access the data, the scope and duration of their authorisation are clearly defined.

Among the personal data stored in our Foundation, personal data related to employee candidates and references are stored for the period determined by the legislation or as long as the legitimate interests of our Foundation requires.

Necessary measures have also been taken for the physical security of personal data in our Foundation. While the personal data in our Foundation that are linked to physical assets are stored in the Archive with appropriate security measures, personal data obtained through the information system that are not linked to physical assets are stored on servers protected by appropriate security measures.

b) Destruction of Personal Data

Personal data shall be deleted, destroyed or anonymised in the event that the reasons requiring the processing of personal data held within the framework of Article 138 of the Turkish Penal Code and Article 7 of the KVKK disappear.

Our Foundation deletes, destroys or anonymises the personal data that it stores pursuant to the KVKK and secondary legislation and in accordance with this Policy Statement within the specified periods specified in the Personal Data Retention and Destruction Policy in the event that the reasons requiring the processing of the data disappear.

The deletion, destruction and anonymisation techniques regarding the destruction of personal data by our Foundation and the procedures to be applied in these matters are detailed in the Personal Data Storage and Destruction Policy.

VII- RIGHTS OF THE PERSONAL DATA OWNER AND EXERCISE OF THESE RIGHTS

Pursuant to Article 11 of the KVKK, everyone has the right to obtain the following information about themselves by applying to our Foundation.

- a. To learn whether personal data is being processed,
- b. Requesting information if personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request correction of personal data in case of incomplete or incorrect processing,
- f. To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7,
- g. To request notification of the transactions made pursuant to subparagraphs (e) and (f) to third parties to whom personal data are transferred,
- h. To object to the occurrence of a result to the detriment of the person themselves due to the analysis of the data exclusively through automated systems,
- i. In case of damage due to unlawful processing of personal data, to demand compensation for the damage.



In order to ensure that the data subject can use these rights effectively, our Foundation has made an internal arrangement to meet these applications and information and means on what these rights are and how to exercise them are provided both in the explicit consent texts received from the data subjects and on our Foundation's website. Pursuant to Article 13 of the KVKK, such applications from the data subject will be evaluated and our Foundation will respond positively or negatively to the addressees within 30 days. No fee will be charged to the addressees for these transactions.

VIII-FOLLOW-UP ON PERSONAL DATA PROCESSING

In our Foundation, all activities are monitored in order to monitor the processing of personal data, to monitor legislative amendments on issues related to the processing of personal data, to increase the awareness of the employees of our Foundation on the processing of personal data and to work on the activities that can be carried out to make this a part of the corporate culture, to make the necessary changes and arrangements in the management documents put into effect on the processing of personal data.

IX-ENFORCEMENT AND REVISION OF THE POLICY STATEMENT

Our Foundation has taken the necessary steps and fulfilled its obligations for compliance with the KVKK and the relevant legislation. The Policy Text has been put into effect as of 22/12/2021.

Revision proposals deemed necessary to be made in this Policy Statement are submitted to the general manager as soon as possible.

Revision Date	Revision Item and Subject
1.	
2.	