

SAMİLSAN HEALTH SERVICES TOURISM CONSULTANCY TRADE LTD.ŞTİ.

CLARIFICATION TEXT ON THE ACQUISITION AND PROCESSING OF PERSONAL DATA

IDENTITY OF THE DATA CONTROLLER

Samilsan Sağlık Hizmetleri Turizm Turizm Danışmanlık Ticaret Ltd. Şti. (hereinafter referred to as "International Plus" or "Institution"), which operates at Hürriyet Mahallesi Doktor Cemil Bengü Caddesi No.8/4 Kağıthane İstanbul, and its personnel, process, store and transfer all kinds of personal data we hold in line with the importance we attach to the security of your personal data that you have provided to us during the health tourism brokerage service provided to you in accordance with the **Personal Data Protection Law No. 6698 ("Law")**. This information is provided in accordance with the Law titled "Disclosure Obligation of the Data Controller" regarding your personal data collected, stored and processed by **International Plus** in the capacity of "Data Controller".

Article 10 of the Convention.

As Data Controller within the scope of the Law and the relevant legislation, your personal data will be processed within the framework described below and in accordance with the Basic Law on Health Services No. 3359, the Decree Law No. 663 on the Organization and Duties of the Ministry of Health and its Affiliated Organizations, the Regulation on Private Health Institutions for Outpatient Diagnosis and Treatment, the Regulation on the Processing of Personal Health Data and Ensuring Privacy, and the regulations of the Ministry of Health and other legislation.

PURPOSE OF PROCESSING PERSONAL DATA

Your personal data is obtained through verbal, written, visual or electronic media, call center, website, verbal, written and similar channels for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services provided by International Plus, planning and management of health services and financing and in accordance with the fields of activity of International Plus. Your personal data of special nature, especially your health data, and your personal data of general nature may be processed by International Plus in a limited and measured manner in connection with the purposes specified in this article, including but not limited to the following:

- Your identity information: Your name, surname, Turkish ID number, passport number or temporary Turkish ID number, place and date of birth, marital status, gender, insurance or patient protocol number, and other identification data we can use to identify you
- Your contact information: Your address, telephone number, e-mail address and other contact data, your voice call records kept by customer representatives or patient services in accordance with call center standards, and your personal data obtained when you contact us via e-mail, letter or other means.
- Your Accounting Information: Your financial data such as your bank account number, IBAN number, credit card information, billing information.
- Your data regarding private health insurance for the purpose of financing and planning of health services and your data from the Social Security Institution.

- If you visit our institution, your camera recordings, which are kept for security and audit purposes, will be recorded.
- Your health information: Your laboratory results, test results, examination data, diagnosis and operation information, medical background data, medical ancestry data, appointment information, prescription information, medication information, pre- and post-operative photographs, three-dimensional visual data, clinical follow-up videos, all kinds of health-related personal data obtained during or as a result of the execution of medical diagnosis, treatment and care services, including but not limited to pre-examination consultation, diagnosis, treatment and follow-up with your doctor in digital media (e-mail, SMS, social media, digital messaging platforms, etc.)
- Browsing information, IP address, browser information on <https://www.internationalplus.net> and your health data, medical documents, surveys, form information and other personal data that you submit or transmit
- If you apply for a job to International Plus, your other personal data, including the resume provided in this regard, and if you are an employee or related employee of International Plus, your service contract and all kinds of personal data regarding your predisposition to work
- Any personal data obtained by International Plus (including but not limited to sensitive personal data) may be processed for the following purposes:
 - Confirming your identity,
 - Protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing
 - Responding to all your questions and complaints regarding the health services you have received
 - Sharing the information requested by the Ministry of Health and other public institutions and organizations and all authorities in accordance with the relevant legislation, reporting, fulfilling information obligations
 - Fulfillment of information and document retention obligations arising from legal regulations
 - For the education and information of other patients and the public, promotion, volume increase, scientific research and training purposes in accordance with your explicit consent,
 - Planning and managing the internal functioning of International Plus and daily operations
 - Patient management, patient rights, patient experience sections by
Measuring, increasing and researching patient satisfaction
 - Providing information about the services you receive, complementary services and new services
 - Notify you about the appointment if you make an appointment
 - Fulfillment of risk management and quality improvement activities
 - Analyzing for the purpose of improving health services
 - Financing your healthcare services by Patient Services, Financial Affairs, Marketing departments, covering your examination, diagnosis and treatment expenses, sharing the requested information with private insurance companies within the scope of eligibility inquiry
 - Conducting research
 - Fulfillment of legal and regulatory requirements
 - Sharing requested information with private insurance companies within the scope of financing health services
 - Invoicing for our services by the quality, patient experience and information systems department and confirming your relationship with contracted institutions

- Participation in campaigns and providing campaign information by Marketing, Media and Communications, Call Center departments, designing and communicating special content, tangible and intangible benefits on web and mobile channels.
- And without limitation, your Personal Data obtained and processed in accordance with the Law may be transferred to the physical archives and / or information systems belonging to International Plus and kept in both digital and physical environments for their purposes.

Pursuant to the Law, personal data is defined as all kinds of data belonging to an identified and identifiable natural person, and all kinds of your data to be accepted within this scope are evaluated by **International Plus subject to the** relevant legislation.

In this context,

- **International Plus** collects and processes personal data from the data owners who receive services in order to perform health tourism intermediary services, through the employees of the company in order to create and keep the records required to be kept in accordance with the Basic Law No. 3359 on Health Services, the Decree Law No. 663 on the Organization and Duties of the Ministry of Health and its Affiliated Organizations, the Regulation on Private Health Institutions for Outpatient Diagnosis and Treatment, the Regulation on Processing and Ensuring the Privacy of Personal Health Data and the regulations of the Ministry of Health and other legislation.
- Collects and processes personal data of **International Plus** employees and employees of suppliers/subcontractors providing services to **International Plus** in accordance with the activities of **the Institution**.
- **International Plus** collects and processes the data of visitors to **International Plus** campuses in order to ensure the security of the environment and for the benefit of data subjects.
- **International Plus** collects and processes personal data with the consent of individuals in order to promote its fields of activity and to reach its customers and its own personnel.
- Data is collected and processed by obtaining consent in order to carry out reporting, statistics and similar studies deemed necessary within the scope of **International Plus** activities.

COLLECTION OF PERSONAL DATA AND LEGAL GROUNDS

Personal data; websites, social media channels, including but not limited to interviews, in all kinds of verbal, written or electronic media (documents, contracts and printed forms in physical media; in electronic media via corporate website, e-mail, in-house software, video and call center voice recording systems), for the purposes stated above and in line with the field of activity of International Plus, to be processed, transferred and stored by obtaining the explicit consent of the data owners.

The legal reasons for collecting your personal data:

- Law No. 6698 on the Protection of Personal Data
- Basic Law No. 3359 on Health Services
- Law No. 663 on the Organization and Duties of the Ministry of Health and Affiliated

Organizations

Decree Law

- Regulation on Processing and Protection of Privacy of Personal Health Data
- Ministry of Health regulations and other legislative provisions.

In addition, as stated in Article 6, paragraph 3 of the Law, personal data related to health can only 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.

Method of Collection of Personal Data; Your personal data is collected verbally, in writing or electronically by automatic or non-automatic methods, **International Plus'** website, social media channels, mobile applications and similar means. Your personal data may be collected, updated and processed as long as you benefit from the services of our **Institution**, when you participate in organizations organized by our **Institution**, when you apply for a job to our **Institution**, when you call the call center of our **Institution**, when you visit our Institution's premises, website or social media accounts.

It will be possible to process your personal data that we collect in accordance with the above methods in the presence of your explicit consent or in the absence of your explicit consent in the presence of at least one of the following situations. -

- The provisions of laws and regulations in force in the Republic of Turkey require processing (Code of Obligations, Commercial Code, Labor Law, Basic Law No. 3359 on Health Services, Decree Law No. 663 on the Organization and Duties of the Ministry of Health and its Affiliated Organizations, Regulation on Private Health Institutions for Outpatient Diagnosis and Treatment, Regulation on the Processing of Personal Health Data and Ensuring Privacy, etc.).
- It is mandatory for the protection of your life or the life or bodily integrity of yourself or another person when you are unable to give your explicit consent due to actual impossibility,
- If it is necessary for the performance of the contract we have concluded with you
- Processing of your personal data is necessary for the fulfillment of our legal obligations
- Your personal data has been made public by you
- Necessary for the exercise or protection of our legal or contractual rights
- Processing of your personal data is necessary for our legitimate interest, provided that it does not harm your fundamental rights and freedoms

TRANSFER OF PROCESSED PERSONAL DATA

International Plus may share your personal data for the purposes described above with the following persons within the framework of Articles 8 and 9 of the KVKK and other legislation:

- In order to continue its activities and business processes, **the Institution** may share personal data at the rate and duration required by the work within the scope of the contracts with subcontractor organizations or third parties that provide services on a permanent or temporary basis.
- Data can be transferred to official authorities and public institutions when necessary.
- Your personal data collected; Within the framework of the above-mentioned reasons, purposes and regulations in the Law; As it will be used internally by our **Institution**, the Social Security Institution, the Ministry of Health and its sub-units, private hospitals and private health insurance companies that we have contracted for operations requiring surgery, law enforcement and all kinds of judicial authorities, your authorized representatives, lawyers, tax and financial consultants and auditors, including third parties, regulatory and supervisory institutions and information technology support (server, hosting, software, cloud computing, etc.), domestic / foreign service providers and other legally authorized public institutions.) from which we receive information technology support (server, hosting, software, cloud computing, etc.) and other legally authorized public institutions, institutions and organizations we cooperate with in order to carry out our activities, domestic/foreign companies from which we receive services for sending commercial electronic messages, banks we have contracted with, various domestic/foreign advertising companies, agencies and survey companies or other domestic/foreign business partners, legally authorized public institutions and private persons at home and abroad, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK.

Except for the purposes given above, any personal data transfer that is incompatible with our **International Plus** activities will not be shared by third parties / institutions / organizations without the explicit consent of the data owner or in case of legal obligation.

RIGHTS OF THE DATA SUBJECT WHOSE PERSONAL DATA IS PROCESSED

The personal data owner may apply to **International Plus** in accordance with Article 11 of the Law;

- a) Learn whether their personal data is being processed,
- b) Request information if their personal data has been processed,
- c) Learn the purpose of processing personal data and whether it is used in accordance with its purpose,
- d) To know the third parties to whom personal data is transferred domestically or abroad,
- e) Request correction of personal data if it is incomplete or incorrectly processed,
- f) To request its deletion or destruction within the framework of the conditions stipulated in Article 7 of the KVKK,
- g) To request notification of the transactions made in accordance with paragraphs (e) and (f) of (and (f) listed above 3rd parties to whom personal data are transferred,
- h) To object to the occurrence of a result to his/her detriment due to the analysis of his/her personal data exclusively by automated systems,
- i) In case of damage due to unlawful processing of personal data, it has the right to demand

compensation for the damage.

Requests submitted within this scope will be finalized by the Authority within thirty days at the latest. **International Plus** responds to the requests within this scope without charging a fee up to ten pages if a written response is to be given; by charging a transaction fee of 1 Turkish Lira for each page over ten pages. The response to the application shall be recorded on a record such as CD, flash memory

environment, the fee that may be requested by the Personal Data Protection Authority shall not exceed the cost of the recording medium.

Your personal data that we collect and process must be accurate and, when necessary, up-to-date in accordance with Article 4 of the KVKK No. 6698. Therefore, in the event of any change in your personal data, you can notify your current and accurate personal information by the methods specified below.

DATA SECURITY

International Plus protects your personal data in full compliance with all technical and administrative security controls that must be taken in accordance with information security standards and procedures. These security measures are provided at a level appropriate to the possible risk, taking into account the technological possibilities.

IF YOU WANT TO CONTACT US FOR YOUR REQUESTS

Your personal data is meticulously protected within the technical and administrative possibilities and the necessary security measures are provided at a level suitable for possible risks, taking into account the technological possibilities. Law in the scope of send your requests to "<https://internationalplus.net/wp-content/personal-data-application-form.pdf>" by filling out the "Application Form Pursuant to the Law on the Protection of Personal Data" at;

(i) You can send a petition bearing your wet signature by cargo to **Hürriyet Mahallesi Doktor Cemil Bengü Caddesi No.8/4 Kağıthane İstanbul**, Turkey by writing "Information Request within the Scope of the Law on the Protection of Personal Data" on the envelope,

(ii) He can send it through a notary public,

(iii) samilsan@hs01.kep.tr with secure electronic or mobile signature, via registered electronic mail address or your electronic e-mail address registered in our system and/or

We kindly request you to submit your requests within the scope of the Law to us by filling out the "Application Form in accordance with the Law on the Protection of Personal Data" at the address "<https://internationalplus.net/wp-content/personal-data-application-form.pdf>" and using the procedures specified in the form.