

**ÇİL-PA HÜSNÜ ÇİL MARKETING AND TRADE LIMITED COMPANY****CORPORATE PERSONAL DATA PROTECTION POLICY**

<b>Document Information</b>	
<b><u>Document Name :</u></b>	Personal Data Protection Policy
Document Relevance	The purpose of the Personal Data Protection Policy is to plan processes for the protection of personal data by ÇİL-PA and to determine the principles to be applied in this regard.
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<b><u>Approval Authority:</u></b>	ÇİL-PA Board of Directors

# ÇİL-PA HEALTH SERVICES INC.

## CORPORATE PERSONAL DATA PROTECTION POLICY

### 1. PURPOSE

The right to request the protection of personal data related to oneself is a sacred right arising from the Constitution. As ÇİL-PA, we consider it one of our most valuable duties to fulfill this right. Therefore, we attach importance to the processing and protection of your personal data in compliance with the law.

The Corporate Personal Data Protection Policy has been prepared to determine the principles and procedures we follow in processing and protecting personal data, as a result of the importance we attach to the protection of personal data.

#### 1. SCOPE

The policy covers any kind of operation carried out on personal data, including the completely or partially automatic or non-automatic collection, recording, storage, preservation, alteration, rearrangement, disclosure, transfer, assignment, rendering available, classification or prevention of use of personal data, as long as they are part of a data recording system.

The policy applies to all personal data processed by ÇİL-PA regarding its partners, officials, customers, employees, supplier officials and employees, and third parties.

ÇİL-PA may change the Policy in conformity with the legislation and the decisions of the Personal Data Protection Authority for the purpose of better protection of personal data.

### 3. DEFINITIONS

Abbreviation	Definition
Buyer Group	Category of real or legal persons to whom personal data are transferred by the data controller.
Open Consent	Consent, based on information, relating to a specific matter and expressed freely by the person concerned.

Anonymization	The process of rendering personal data incapable of being associated with the identity of a natural person, either directly or indirectly, by matching with other data.
Related person	The natural person to whom personal data relates.
Related User	Those who process personal data within the data controller organization or on behalf of the data controller, other than the person or unit responsible for the technical storage, protection, and backup of the data, according to the authority and instructions received from the data controller.
Destruction	Deletion, destruction, or anonymization of personal data.
Law/KVKK	Law No. 6698 on the Protection of Personal Data.
Recording Media	Any medium containing personal data processed by fully or partially automatic or non-automatic means, as long as they are part of a data recording system.
Personal Data	Any information relating to an identified or identifiable natural person.
	Inventory detailing the processing activities of personal data by data controllers, which includes the purpose and legal basis for processing personal data, data categories, recipient groups to which data are transferred, and the groups of data subjects,

Data Inventory	as well as the maximum retention period required for the processing purposes, and the personal data to be transferred to foreign countries, and the measures taken for data security, in relation to the business processes of data controllers.
Your Personal Data Processing	Any operation carried out on personal data, including the completely or partially automatic or non-automatic collection, recording, storage, preservation, alteration, rearrangement, disclosure, transfer, assignment, rendering available, classification or prevention of use of personal data, as long as they are part of a data recording system.
Commission	The Personal Data Protection Commission established by ÇİL-PA to manage the Policy and related procedures, and to ensure the implementation of the Policy.
Board	Personal Data Protection Authority.
Organisation	Kişisel Verileri Koruma Kurumu
Special Qualified Personal Data	Racial or ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of an association, foundation or trade union, health, sexual life, criminal conviction and security measures related data, as well as biometric and genetic data.
	Deletion, destruction, or anonymization process of personal data, which will be repeated at intervals specified in the

Periodic Destruction	retention and destruction policy of personal data, in case all the processing conditions of personal data specified in the Law are eliminated.
Policy	Personal Data Protection Policy.
Data Processor	Real or legal person processing personal data on behalf of the data controller based on the authority granted by the data controller.
Data Controller	Real or legal person responsible for determining the purposes and means of processing personal data, and establishing and managing the data recording system..

#### 4.GENERAL PRINCIPLES

ÇİL-PA checks the conformity of new personal data processing workflow with the following principles in the preparation stage. Workflows that are not deemed appropriate are not implemented. When processing personal data, ÇİL-PA;

(I) Complies with the law and principles of fairness.

(II) Ensures that the personal data is accurate and up-to-date when necessary.

(III) Pays attention to the fact that the processing purpose is specific, clear and legitimate.

(IV) Controls that the data being processed is related to the processing purpose, processed to the extent necessary and proportionate.

(V) Maintains data only for as long as necessary and required by the relevant legislation or for the purpose of processing, and destroys it when the processing purpose is no longer applicable.

#### 1. DUTIES AND RESPONSIBILITIES

The Personal Data Protection Commission has been established within ÇİL-PA to manage this Personal Data Processing Policy and other relevant procedures and to ensure the implementation of the Policy. The Commission is made up of the General Manager, Head of Human Resources, and Head of Administrative and Financial Affairs. In addition, ÇİL-PA may also seek support from KVKK consultancy in order to comply with the Personal Data Protection Law No. 6698 as necessary. If necessary, the Commission may invite the KVKK consultant to its meetings.

The duties and responsibilities of the Commission are as follows:

- (I) It normally meets every six months. It can be called for an extraordinary meeting if necessary (for example, in the event of a potential data breach).
- (II) It discusses any changes or improvements that need to be made to the Policy.
- (III) It determines the measures that can be taken to ensure the legal processing and protection of personal data.
- (IV) The Commission determines the steps that can be taken to increase KVKK awareness within ÇİL-PA and its business partners.
- (V) It identifies and takes necessary administrative and technical measures against risks that may arise in the processing and protection of personal data.
- (VI) It establishes and manages relations with the institution.
- (VII) It evaluates requests from the Data Subject.
- (VIII) It follows the periodic destruction process.
- (IX) It updates the Data Inventory.
- (X) It makes assignments related to the aforementioned matters.

## 1. PRECAUTIONS TAKEN FOR DATA SECURITY

ÇİL-PA takes all necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of personal data, prevent unauthorized access to personal data, and ensure the preservation of personal data.

### 6.1. Technical Measures

- (I) Network and application security is provided.
- (II) Security measures are taken within the scope of procurement, development, and maintenance of information technology systems.

(III) Access logs are regularly kept.

(IV) Current anti-virus systems are used.

(V) Security walls are used.

(VI) Necessary security measures are taken in relation to the entry and exit of physical environments containing personal data.

(VII) The security of physical environments containing personal data is ensured against external risks (fire, flood, etc.).

(VIII) The security of environments containing personal data is ensured.

(IX) Personal data is backed up and the security of the backed-up personal data is also ensured.

(X) User Account Managers and permission control systems are implemented and these are also tracked.

(XI) Log records are kept in a manner that does not allow user intervention.

(XII) Attack detection and prevention systems are used.

(XIII) Encryption is used.

## 6.2. Administrative Measures

(I) There are disciplinary regulations containing data security provisions for employees.

(II) Training and awareness-raising activities on data security are carried out for employees at certain intervals.

(III) Institutional policies on access, information security, use, storage, and destruction have been prepared and implemented.

(IV) Data masking measures are applied as necessary.

(V) Confidentiality commitments are made.

(VI) An authorization matrix has been created for employees.

(VII) The authorities of employees who have had job changes or have left the company are removed in this area.

(VIII) The signed contracts contain data security provisions.

(IX) Personal data security policies and procedures have been determined.

(X) Personal data security issues are reported quickly.

(XI) Personal data security is monitored.

(XII) Personal data is minimized as much as possible.

(XIII) Periodic and/or random internal audits are carried out and commissioned.

(XIV) Current risks and threats are identified.

(XV) Protocols and procedures for personal data security with special characteristics have been determined and implemented.

(XVI) If sensitive personal data is to be sent by electronic mail, it must be sent encrypted and using KEP or corporate mail accounts.

(XVII) The data processing service providers are made aware of data security.

## 1. THE RIGHTS OF THE DATA SUBJECT REGARDING THEIR PERSONAL DATA

The data subject may request the following from ÇİL-PA by applying:

(I) To learn whether their personal data has been processed,

(II) To request information about the processing of their personal data if it has been processed,

(III) To learn the purpose of the processing of their personal data and whether they are being used in accordance with this purpose,

(IV) To learn about the third parties to whom their personal data has been transferred within the country or abroad,

(V) To request the correction of their personal data if it has been processed incompletely or inaccurately, and to request notification of this correction to the third parties to whom their personal data has been transferred within this scope,

(VI) To request the deletion, destruction, or anonymization of their personal data, even if it has been processed in accordance with the provisions of KVKK and other relevant laws, if the reasons requiring its processing have ceased to exist, and to request notification of this processing to the third parties to whom their personal data has been transferred within this scope,

(VII) To object to the processing of their data through analysis by automatic systems exclusively if an adverse result arises,



(VIII) To request the compensation of the damages they have suffered due to the illegal processing of their personal data.

#### 1. CHANGES

Changes to this policy are prepared by the Commission and presented to the ÇİL-PA Board of Directors for approval. The updated policy may be sent to employees via email or published on the website.

#### 1. EFFECTIVE DATE

This version of the policy was approved by the Board of Directors on December 16, 2022 and became effective.

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