

ANTALYA DK KLİNİK ANONİM ŞİRKETİ

PRIVACY POLICY



Address : Şirinyalı Mah. İsmet Gökşen Cad. No: 14/D Elif Apt.
Muratpaşa- Antalya

E-Mail : info@dk-klinik.com.tr

Web Site : <https://en.dk-klinik.com.tr/>



CONTENTS

PRIVACY POLICY	1
INTRODUCTION	3
3. WHAT KIND OF DATA IS PROCESSED?	5
6. HOW LONG IS YOUR DATA STORED?	7
7. TO WHOM AND FOR WHAT PURPOSES IS YOUR DATA TRANSFERRED?	8
8. COOKIES AND OTHER DATA COLLECTION TECHNOLOGIES	9
9. DATA SUBJECT AGE LIMIT	10
10. OTHER ASPECTS OF YOUR PRIVACY AND SECURITY	10
11. CHANGES TO THE POLICY	11
12. YOUR RIGHTS	11
13. CONTACT US	12



INTRODUCTION

Your safety is important to us. For this reason, the personal data you will share with us is sensitively protected. This Privacy Policy is in accordance with Regulation (EU) 679/2016 on the protection of natural person ("data subject", "person") the European Union General Data Protection Regulation ("GDPR") and other legislation Antalya DK Klinik Anonim Şirketi ("Clinic","Controller") is intended to provide information on the procedures and principles collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of natural persons whose data are processed. This Policy protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data. Personal data refers to any data belonging to an identified or identifiable natural person.

Also, Personal Data process under lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality and accountability principles.

Ensuring the security of the personal data of the natural persons whose data are processed is one of the primary objectives of the Controller. For this reason, in order to process the personal data of natural persons securely and to prevent any unlawful access to these data or to prevent them, in accordance with the legislation in force in the national and international area, Controller provides the necessary measures as much as possible.

If the following information is not sufficient for you and your requests, please contact us in the last section titled " Contact Us".

1. WHO DOES THE PRIVACY POLICY COVER?

This privacy policy has been created in order to inform our customers and potential customers who receive the services we undertake to provide from our clinic, with whom we have contractual relations or who carry out interviews, about the processes related to the collection, processing, and transfer of their personal data.

Data processing takes place taking into account the state of the subject, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the varying probability and risks of violence of the processing to the rights and freedoms of natural persons.

2. HOW IS YOUR PERSONAL DATA COLLECTED?

This Privacy Policy explains how it processes personal data when you interact with us through digital media, such as our website, by phone, or by visiting our Clinic.

Your Personal Data, depending on the services provided by our Clinic;



- o Through your statements regarding your identity and contact information,
- o By coming to our Clinic for the purpose of medical practice and by means of all kinds of documents and declarations submitted in order to make an assessment of the treatment to be applied,
- o Through the "Patient Information and Consent Form" directed to you regarding the treatment and/or operation to be applied by our clinic,
- o Our clinics website <https://en.dk-klinik.com.tr/> "Contact" Form in which you submit your requests and complaints through the website,
- o Through invoices and similar accounting transactions issued in relation to the service we provide,
- o By means of electronic mails that you will send to the corporate e-mail address info@dk-klinik.com.tr whose provider belongs to the clinic is located in the country,
- o Through the cookies used in accordance with your permissions through the website of our clinic,
- o Through the photo/video recordings taken before, after, and/or during the medical procedure applied to you by our clinic,
- o Health tourism activities needed some kind of data. Controller collect data to complete and conduct this purpose.
- o Through your messages sent to us by our clinic using the online applications (Whatsapp / Zoom / Instagram / Facebook etc.) you receive services by accepting their own Privacy Policies and Foreign Transfer Principles or if necessary, through the online audio/video calls you have made through these applications,
- o By accepting their Privacy Policies and Foreign Transfer Principles, by sending direct messages to the profile account of our Clinic located in the social media accounts (Instagram, Youtube, Facebook, Twitter, etc.) of which you are already a user and whose server is located abroad, and/or by commenting on their posts,
- o The security cameras/CCTV Recording Data in our Controller are taken.

The controller shall implement appropriate technical and organizational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed.

In order for the Controller to fully and properly perform its contractual and legal obligations and to the legal bases described in detail, as well as the necessary



administrative, technical and physical measures, shall be processed by taking as much as possible.

In addition, when you visit and interact with our website, information that uses cookies and other data collection technologies may also be collected through this. For more information, issues are detailed in the “Cookies and Other Data Collection Technologies” section below.

3. WHAT KIND OF DATA IS PROCESSED?

Personal data is processed in accordance with data processing principles only to the extent that it is necessary, where our processing is mandatory due to applicable legal requirements or as permitted by you.

Your data is processed in terms of activities;

- o In accordance with the contract processes in terms of treatment and medical applications;
Identity Information (Name Surname, Signature), Contact Information (Address, Mobile Phone Number, Mail Address, etc.), Financial Information (Bank account information, IBAN, etc.), Customer Transaction Information (Shopping information, Request/Complaint Information, etc.), Treatment and health data, Audiovisual Recording Information (Before/After Photos), Flight informations, Transfer informations and accomodation details.
- o In terms of your complaints about receiving information and requests through contract negotiations, contact forms, social media, and other digital communication platforms;
Identity Information (Name Surname, Signature), Contact Information (Address, Mobile Phone, E-Mail Address, Social Media Profile Information, etc.), Customer Transaction Information (Request and complaint information, Shopping history information), Treatment and Health Data
- o In order to be able to contact you for Advertising, Campaign, and Promotion transactions; Identity Information (Name Surname), Contact Information (E-mail and mobile phone information),
- o In order to ensure workplace safety; Visual Recording Data (CCTV Recording data)
- o In terms of conducting financial and accounting transactions; Identity Information (Name Surname) Financial Information (Bank account information, IBAN, etc.)
- o We process personal data we receive from Controller's contracted companies and other third parties (e.g. data from credit institutions) as long as it is necessary for the performance of your contract and pre-contractual measures, if you have given your consent.
- o We only process personal data from publicly available sources (e.g. authorities, the Internet) to the extent permitted by law, for example as necessary for the provision of our services or because you have given your consent.

4. LAWFULNESS OF DATA PROCESSED



Processing shall be lawful only if and to the extent that at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

We process your personal data to the extent necessary to protect the legitimate interests of Controller or a third party (Article 6 (1) (f), GDPR). This is especially process in the following situations:

- Fulfillment of the Obligation Arising from Contracting and Fulfillment of Service Sales Processes, Follow-up, and Execution of Legal Affairs, Execution of Post-Operation Maintenance Services, Development, Fulfillment of International Healthcare Tourism Activities
- Execution of Customer Relationship Management Processes
- Marketing, Advertising, Campaign, and Promotion Activities
- Conduct health tourism activities
- Follow-up on Requests and Complaints
- Ensuring Security
- Execution of Finance and Accounting Works
- Carrying out storage and archive activities

For the purposes of the following legal reasons;

- o Due to the performance of the contract, it is mandatory to collect with you through the contract to be concluded if it is agreed for treatment and medical procedures and in accordance with the service received the data specified in detail under the heading "What kind of data is processed?" will be processed based on this legal reason.
- o Within the scope of legitimate interest, the data collected by you are collected by our Controller provided that it does not harm your fundamental rights and freedoms. An example of this is the recording data collected through camera recordings.
- o In some cases, your data is processed with your consent based on the condition and condition of obtaining your consent. For example, in terms of campaign and promotion processes, your data related to this purpose may be processed by obtaining your consent.



5. YOUR PERSONAL DATA AND OUR WEBSITE

Controllers website is our most important communication tool. Here, we communicate our work such as our guidelines, recommendations, best practices, advices, opinions and decisions. In addition, we communicate data protection news and information about data protection topics to the general public, as well as to our more expert audiences.

Some of the information and services offered on our website require the processing of your personal data.

We do not reuse the information for other purposes unless specifically indicated in a privacy notice for a specific processing operation. We will never process your personal data for direct marketing purposes.

Under certain conditions outlined in law, we may disclose your information to third parties, (such as the European Anti-Fraud Office, the Court of Auditors, or law enforcement authorities) if it is necessary and proportionate for lawful, specific purposes.

As a rule, we do not keep your personal information for longer than necessary for the purposes for which we collected it. We may keep your personal data for a longer period for historical or scientific purposes with the appropriate safeguards in place.

You can check our specific privacy notices to learn how we may process your personal data, including when it is collected through our website.

6. HOW LONG IS YOUR DATA STORED?

Your personal data will be stored for as long as the Clinic is legally obliged to keep it. Documentation and retention obligations arising from regulations such as time-outs and de-entitlement periods stipulated in the legislations.

The retention periods are set out below. The necessary procedures in terms of the data whose retention period has expired are duly completed and irreversibly destroyed.

Your Personal Data	Retention Period
Personal data processed due to the fulfillment of the contractual obligation and the realization of the Service Sales Processes	Performance of the Contract + 10 years
Your camera recording data collected to ensure Security	3 Months
Your personal data collected for financial transactions	Performance of the Contract + 10 years
Marketing, Advertising, Campaign and Promotion Activities	1 Year
Personal data collected from Potential Customers	1 Year



7. TO WHOM AND FOR WHAT PURPOSES IS YOUR DATA TRANSFERRED?

Your Personal Data and Personal Data of nature; In line with the conditions and purposes within the scope of the Personal Data Processing Terms specified in Articles 5 and 6 of KVKK No. 6698 and Articles 6 and 9 of the GDPR, the transfer will be carried out in accordance with Articles 8 and 9 of the KVKK and Articles 45 - 49 of the GDPR.

Conducting business activities by our clinic, carrying out financial and accounting affairs, carrying out activities in accordance with the legislation, following up and executing legal affairs, protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and their financing, Customer Relationship Management, medical practice, execution of post-operative care services, development, international Fulfillment of tourism activities, clarification of marketing activities, fulfillment of financial, legal and administrative objectives, but not only for the purpose of fulfillment. Administrative, technical and physical security measures in accordance with the legislation will be provided as much as possible and will be able to transfer to the 3rd persons and institutions specified below to the extent that you have consented.

In this context, your Personal Data processed by our Clinic; Financial Advisor, "Clinical Management Software Program" Service Provider, Public Institutions, and Organizations authorized within the framework of the Laws, Judicial Authorities will be transferred to the Judicial Authorities by issuing the necessary administrative measures and "Transfer from Data Controller to Data Processor Confidentiality Agreements" for the following purposes.

In line with the data processed in terms of the activities described in detail under the heading "Which Data is processed?" ;

- o For the purposes of planning and clarifying the financing and financing with the services of the Health, the activities in accordance with the legislation, and the execution of the financial and accounting affairs, the Financial Relations will be transferred to our company.
- o It will be transferred to our Legal Advisor with whom we have an agreement for the fulfillment of legal and administrative obligations, the follow-up and execution of legal affairs, and the execution of activities in accordance with the legislation.
- o It will be transferred to the National and International Public Institutions and Organizations authorized within the framework of the Laws and to the Judicial Authorities for the purposes of fulfilling financial, legal, and administrative obligations, conducting legal affairs, conducting activities in accordance with the legislation, protecting public health, preventive medicine, medical diagnosis, treatment and care services, and providing information to the Authorized Persons, Institutions and Organizations.
- o "Clinical Management Software Program" Service for the purposes of carrying out business activities, medical practice, conducting post-operative care services, developing, Conducting Customer Relationship Management Processes,



International Health Tourism activities, and improving marketing activities It will be transferred to the provider.

- o Clinic transfer the data subjects' accommodation informations and flight informations because of the health tourism. Flight Informations transfer to the institution that promotes. Also your identity and contact informations transfer to the where the data subject stay.

We use the above-mentioned third-party service providers who work on our behalf and in accordance with our instructions to provide the services agreed upon with you. These service providers may receive or contact personal data as part of the provision of services and may represent third parties or recipients within the meaning of the GDPR. It is carried out with measures established in such a way as to comply with the requirements of the GDPR and to ensure the protection of the rights of the data subject.

8. COOKIES AND OTHER DATA COLLECTION TECHNOLOGIES

Cookies are text files containing small amounts of information that are sent to your browser when you visit a website and stored on your devices such as computers, tablets, mobile devices, etc. Cookies send this information back to the originating website or to another website that "recognizes" cookies.

Our clinic uses the relevant personal data obtained with your explicit consent from online and offline sources in order to provide you with various advantages in personalized advertising applications and to advertise, promotion, sales, marketing, event management, promotion, campaign notification, data enrichment and advertising display through search engines that are personally relevant to you. In this direction, it also makes use of data management platforms, social media platforms and similar digital advertising platforms and technologies. For the management of these platforms, cooperates with different companies within the framework of certain contracts and receives support from various companies in operational processes.

The following cookies are used on the website and on the mobile website according to the purpose of use:

- **Mandatory Cookies:** These cookies are necessary for the website to function and cannot be turned off in our systems. They allow you to navigate the website and use its features, such as setting your privacy preferences and taking actions that correspond to a service request, for example logging in or filling out forms.
- **Performance Cookies:** These cookies are used to improve the way the website works. It does not collect information that identifies the visitor contains information about how visitors use the website (e.g., whether they receive error messages on web pages)
- **Functional Cookies:** These cookies allow the website to remember choices you make (such as your user name, language, or region of residence) and provide enhanced, more personal features. It can also be used to remember changes in text size, fonts, and other parts of web pages that you can customize. The information these cookies collect may be kept confidential and they may not track your browsing activity on other websites. If you do not allow these cookies, some or all of these functions may not work properly.



- **Targeting and Advertising Cookies:** These cookies are used to create your profile and deliver advertisements that are relevant to your interests. It is also used to help measure the effectiveness of an advertising campaign, as well as to limit the number of times you see an advertisement. It is usually placed on advertising networks with the permission of the website owner (e.g., social media sites). Information about your visit to the website is shared with advertisers and other organizations. If these cookies are not allowed, we will not be able to experience our targeted advertising on different websites.

The "Cookie Policy" can be examined for more detailed information on the subject.

9. DATA SUBJECT AGE LIMIT

Within the scope of national and international legislation in the field of personal data protection, you can personally consent to the processing of your personal data, provided that you have completed at least 18 years of age. The consent of patients/clients under this age limit must be given by their legal representatives.

Within the scope of the GDPR, citizens of European Union countries and persons residing in European Union countries may give their consent to the processing, transfer, and other processing of their personal data in person at least 16 years of age or at least at the age of 16 years. If you are in this or below that, approvals must be given by your legal representatives.

10. OTHER ASPECTS OF YOUR PRIVACY AND SECURITY

The data of either customers or other persons in our clinic is confidential. No one may use, copy, reproduce, transfer to others, or use this data for any other purpose without compliance with the contract or the law, except for the purposes of the processing.

It is undertaken that the necessary care is taken to all kinds of data collected by you in our clinic. In this sense, the necessary technical, administrative, and physical measures are taken to the extent possible in order to protect your personal data collected by our Clinic and to prevent it from falling into the hands of unauthorized persons. In this context, it is ensured that the software complies with the standards, that third parties are carefully selected and that data protection policies are complied with within the clinic. Safety-related measures are constantly being renewed and improved. In this regard, a continuous protection mechanism is operated by carrying out periodic reporting, audits, and analysis processes in our clinic.

In our clinic, the necessary internal and external audits on the protection of personal data are carried out in accordance with the requirements of the law. Since audits are carried out both in a planned and raided manner, your data security is protected through periodic checks.

11. CHANGES TO THE POLICY

In this Policy, changes can be made within the framework of our changing practices and developing legislation when necessary. When material changes are made to this Policy, you will be provided with appropriate notice and posted on our website.



12. YOUR RIGHTS

As a Data Subject, your Personal Data is protected in accordance with the GDPR. Where the GDPR falls under its jurisdiction (European Union citizens or residents of European Union countries to whom the Service is provided), your rights are as follows;

- o Right of Access - Art. 15 GDPR: You have the right to know whether personal data concerning yourself is being processed, and if your personal data is processed, you have the right to access the details contained in Art. 15 GDPR.
- o Right to Correction - Art. 16 GDPR: You have the right to have your personal data corrected by applying at any time for your personal data that is within the clinic and belongs to the Clinic.
- o Right to Erasure - Art. 17 GDPR: You have the right to request the erasure of your personal data held within the clinic. If the matters referred to in Article 17 GDPR occur, the Clinic will delete your personal data immediately, unless there are any other obstacles.
- o Right to Restriction of Processing - Art. 18 GDPR: If you object to the timeliness of your Personal Data, you have the right to request the restriction of the use of your Personal Data until the accuracy of your Personal Data is confirmed by the Clinic. In cases where the processing of Personal Data is illegal, the Clinic no longer needs your personal data for the purpose of processing, you have the right to request the restriction of the use of your data. If you object to the processing activity in accordance with Article 21 § 1 GDPR, you have the right to request the restriction of the use of your data until the Clinic's legitimate grounds for processing data are decided to balance with your legitimate reasons.
- o Right to Data Transport - Art. 20 GDPR: You have the right to request that your personal data held within the clinic be transferred to another controller by applying for it. However, this right may be exercised when the data processing is based on consent or when required by the contract.
- o Right to Object - Art. 21 GDPR: You have the right to object to the processing of your personal data, including profiling under Art. 6 § 1 e and f GDPR, on the basis of grounds relating to your particular situation. If the clinic fails to see why a powerful process is concerned, it cannot process your personal data. Where your personal data is processed for marketing purposes only, you have the right to object to the processing for this purpose at any time.

*There is no automated decision making within the meaning of Article 22 GDPR.

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data (Article 21 GDPR). We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or if the processing serves to assert, exercise or defend legal claims.



If you want to object to the processing of your personal data, send us an email to info@dk-klinik.com.tr or write to Şirinyalı Mah. İsmet Gökşen Cad. No: 14/D Elif Apt. Muratpaşa- Antalya. In the event of an objection, however, it is possible that we can no longer provide the services agreed with you or not to the agreed extent.

If you believe that we are violating the GDPR by processing your personal data, you have the right to lodge a complaint with a supervisory authority, e.g. the data protection authority responsible for your place of residence, your workplace or the location of the data protection violation. (Art.77 GDPR)

13. CONTACT US

Your Personal Data is processed by Antalya DK Klinik Anonim Şirketi operating at the address of Şirinyalı Mah. İsmet Gökşen Cad. No: 14/D Elif Apt. Muratpaşa- Antalya is considered a "Controller" under the GDPR.

Address : Şirinyalı Mah. İsmet Gökşen Cad. No: 14/D Elif Apt. Muratpaşa- Antalya

E-Mail : info@dk-klinik.com.tr

Web Site : <https://en.dk-klinik.com.tr/>