

# ANTALYA DK KLİNİK ANONİM ŞİRKETİ



## SPECIFIC PRIVACY STATEMENT PROCESSING OF PERSONAL DATA FOR THE PURPOSE OF HEALTH TOURISM ACTIVITIES

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## **1. Introduction**

In this context, Antalya DK Klinik Anonim Şirketi (“Controller, Clinic”), conducts health tourism activities for the European citizens and other countries’ citizens. Controller has customers in different countries other than Turkey, due to the fact that it carries out health tourism activities. For this reason, it carries out data processing activities for this purpose. Controller transfers some of these data because it is required by law and some because it is necessary for the performance of the contract.

## **2. What personal data do we collect, for what purposes, under what legal basis and through which technical means?**

### **2.1 Processed personal data**

In order to conduct a health service, the following personal data are processed: Any personal data, e.g. name, surname, birth date, gender, signature, social media accounts information, address, e-mail, service types, flight information, health information, Customer Transaction Information, Audiovisual Recording Information, opinions, views and any other data provided by the data subject.

### **2.2 Purpose of the processing and Legal Reasons**

Data processing activities in the field of health tourism are carried out by foreign customers by visiting our website, social media platforms, contact numbers or the clinic.

Purposes of data processing activities; executing customer relations management processes, executing health tourism activities, executing finance and accounting works, executing Travel and accommodation planning activities, executing goods/service sales processes, executing contract processes.

Processing your data is necessary for the execution of a contract to which the data subject is a party in accordance with Article 6/1 (b) of the GDPR, or for taking steps at the request of the data subject before a contract is concluded.

Processing is necessary for compliance with a legal obligation to which the controller is subject under Art 6/1(b). Controller has to share the flight information with the Turkish ministry of health for the promotion.

We also process your personal data to the extent necessary to protect the legitimate interests of the Controller or a third party (Article 6 (1) (f), GDPR). This is especially true if necessary for the assertion of legal claims and defense in legal disputes.

### **2.3 Technical means**

The data collected on health tourism is processed and stored through the Clinical Management Software Program whose data center is located in Turkey. If you get in touch with the controller via social media platforms or WhatsApp your data will be stored in their data center.

## **3. Who has access to your personal data and to whom it is disclosed?**

The following entities have access to your information:

- The Controller’s staff, on a need-to-know and need-to-do basis;

- Turkey Personal Data Protection Authority, where relevant and necessary, and also in the context of its participation in the controllers activities;
- Bodies charged with a monitoring or inspection task in application of EU law, where necessary in the context of official investigations or for audit purposes;
- The European Parliament, The Court of Justice of the European Union where relevant and necessary and bodies charged with a monitoring or inspection task in application of EU law, as well as staff of other services, where necessary in the context of official investigations or for audit purposes;
- Controller has to share the flight information and identity data with the Turkish ministry of health for the promotion.
- According to the Art 49/1(b), Supplier companies in Turkey with which we have business relations according to the health tourism. Processors commissioned by us, who can only process data for us and not for their own purposes, are obliged to comply with the strict standards of the Controller. "Clinical Management Software Program Estesoft" 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.  
The processor Estesoft's privacy link;  
<http://www.estesoft.com.tr/Home/ClarificationText>

#### **4. How do we protect and safeguard your personal data?**

All personal data processed by the Controller is kept on open, restricted, password-protected servers only for those who need to know. All functional mailboxes that receive the data about the health services are managed by a limited number of Supervisory IT personnel who have the access they need to perform their duties.

Physical access to hardcopy/printed document in the controller's facilities is protected and restricted to authorized personnel.

In addition, the personal data is protected by appropriate security measures. Also whole workers who access the personal data are educated about the IT security and personal data protection in the privacy standards.

#### **5. How can you verify, modify or delete your personal data?**

You have the right to request from the data controller access to, rectification or erasure of your personal data, restriction of processing concerning the data subject or, where applicable, the right to data portability. Please note that the rights provided to data subjects are not absolute rights and may be subject to exceptions, which may be applied on a case-by-case basis.

You can revoke your consent to the processing of personal data at any time free of charge and for the future. This also applies to declarations of consent given before the EU General Data Protection Regulation came into force before 25 May 2018.

You can object to the processing of your personal data on grounds relating to your particular situation, by stating said grounds in an email sent to the controller. If the controller is not able to demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms, the controller will remove the personal data categories indicated in section 2.1 above. The same applies to the processing for the establishment, exercise or defence of legal claims.

#### **6. For how long do we keep your personal data?**

Documents containing personal data are kept for ten years from the date of request. Documents are deleted at the end of the ten-year period.

We only process and store your personal data for as long as we need it for pre-contractual notification or information issues. After the information activities, if there is no longer a legitimate interest, we delete the data or, if this is not possible, destroy it. We usually delete your data no later than ten years after the end of the activity.

#### **7. What is the time limit for addressing your data subject rights' request?**

The time limit for treating the data subject's request and modifying the database fields is one month. This period may be extended by two further months where necessary, taking into account the complexity and the number of the requests.

#### **8. Who can you contact to ask questions or exercise your rights?**

In case you have questions, or wish to exercise your rights as a data subject, please contact with us, using the following contact information:

##### **Controller's Contact Information;**

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

**E-Mail** : [info@dk-klinik.com.tr](mailto:info@dk-klinik.com.tr)

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

You can also directly contact the our Company at the contact page, on our website (selecting the option "Contact").

#### **9. Complaints**

Whilst we encourage you to always contact us first, Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes The GDPR and other regulations.