

PERSONAL DATA PROTECTION AND PRIVACY POLICY

I. PURPOSE AND SCOPE

Purpose of the Policy:

At Istanbul Retina Institute, we place a high level of importance on the protection and confidentiality of personal data. This Personal Data Protection and Privacy Policy (Policy) has been prepared to explain the purposes for which patient, employee, supplier, and other relevant individuals' data are processed, how these data are protected, and the rights of the relevant individuals.

Scope of the Policy:

This Policy applies to all personal data processed by Istanbul Retina Institute. It covers patient data, employee information, supplier information, visitor data, and all other data belonging to natural persons.

II. FUNDAMENTAL PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Istanbul Retina Institute adheres to the provisions of the Personal Data Protection Law No. 6698 ("KVKK") and the following fundamental principles when processing personal data:

- Lawfulness and Fairness: Data is processed lawfully, fairly, and in accordance with the rules of honesty.
- Accuracy and Up-to-Dateness: Data is kept accurate and up to date when necessary.
- Specified, Explicit, and Legitimate Purposes: Data is processed for specified, explicit, and legitimate purposes.
- Data Minimization: Data is collected in a way that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- Retention Period Compliance: Data is stored for as long as necessary for the purposes for which it is processed or as required by the relevant legislation.

III. CONDITIONS FOR PROCESSING PERSONAL DATA

Personal data may be processed in accordance with Article 5 of the KVKK if at least one of the following conditions is met:

- a. Explicit Consent: If the explicit consent of the data subject has been obtained,
- b. Legal Requirement: If the processing activity is explicitly stipulated by laws,

- c. Impossibility: If the data subject is unable to give consent or if their consent is not legally valid, and it is necessary to protect the life or physical integrity of the data subject or another person,
- d. Performance of a Contract: If the processing is directly related to and necessary for the establishment or performance of a contract,
- e. Legal Obligation: If the processing is necessary for compliance with a legal obligation to which the data controller is subject,
- f. Public Disclosure: If the data has been made public by the data subject,
- g. Establishment of Rights: If the processing is necessary for the establishment, exercise, or protection of a legal right,
- h. Legitimate Interest: If the processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

IV. CONDITIONS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data may only be processed under the following conditions:

- a. If the explicit consent of the data subject has been obtained,
- b. If it is expressly provided for by laws,
- c. If it is necessary to protect the life or physical integrity of the person himself/herself or of any other person who is unable to give consent due to actual impossibility or whose consent is not deemed legally valid,
- d. If the processing is related to personal data that has been made public by the data subject himself/herself, and is in accordance with the purpose of the public disclosure,
- e. If the processing is necessary for the establishment, exercise, or protection of a legal right,
- f. If the processing is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment, and care services, as well as for the planning, management, and financing of healthcare services by persons or authorized institutions and organizations that are under an obligation of confidentiality,
- g. If the processing is necessary for the fulfillment of legal obligations in the areas of employment, occupational health and safety, social security, social services, and social assistance,

- h.** If the processing is related to members, former members, or individuals who have regular contact with foundations, associations, or other non-profit organizations established for political, philosophical, religious, or trade union purposes, provided that it is in compliance with the relevant legislation and purposes, limited to the activities of these organizations, and not disclosed to third parties.

V. TRANSFER OF PERSONAL DATA

Transfer Within Turkey: In accordance with Article 8 of the KVKK, the transfer of personal data within Turkey is possible, provided that one of the conditions specified in the sections titled “Conditions for Processing Personal Data” and “Conditions for Processing Special Categories of Personal Data” of this Policy is met.

Transfer Abroad: In accordance with Article 9 of the KVKK, in cases where personal data is transferred abroad, in addition to meeting the conditions for domestic transfers, one of the following conditions must be fulfilled:

- 1.** The country to which the data is to be transferred, or the relevant sector within that country, has been granted an adequacy decision by the Board.
- 2.** In addition to the data subjects having the ability to exercise their rights and seek effective legal remedies in the country to which the data is to be transferred, one of the following must be in place:
 - a.** The existence of an agreement between public institutions and organizations or professional organizations having the status of a public institution, and the transfer being permitted by the Board,
 - b.** The presence of binding corporate rules that must be followed by companies within a group engaged in joint economic activities, which contain personal data and have been approved by the Board,
 - c.** The existence of a standard contract containing matters such as data categories, purposes of data transfer, recipients and recipient groups, and technical and administrative measures to be taken by the data recipient, which has been announced by the Board,
 - d.** The existence of a written undertaking containing provisions ensuring adequate protection, and the transfer being permitted by the Board.
- 3.** The presence of one of the conditions specified in the Law, provided that the transfer is incidental:
 - a.** The data subject gives explicit consent to the transfer, provided that they are informed of the potential risks.

- b.** The transfer is necessary for the performance of a contract between the data subject and the data controller, or for the implementation of pre-contractual measures taken at the request of the data subject.
- c.** The transfer is necessary for the conclusion or performance of a contract that is in the interest of the data subject, between the data controller and another natural or legal person.
- d.** The transfer is necessary for overriding public interest.
- e.** The transfer is necessary for the establishment, exercise, or protection of a legal right
- f.** The transfer is necessary for the protection of the life or physical integrity of the data subject or another person who is unable to give consent due to actual impossibility or whose consent is not deemed legally valid.
- g.** The transfer is made from a public register that is open to access by persons having a legitimate interest, provided that the conditions specified in the relevant legislation for accessing the register are met and that the transfer is requested by the person having a legitimate interest.

VI. FULFILLMENT OF THE OBLIGATION TO INFORM

As Istanbul Retina Institute, we place great importance on transparency regarding the collection, processing, and transfer of personal data, in accordance with Article 10 of the KVKK. In this regard, as the data controller, we provide information on the methods of collecting your personal data and the legal grounds for such collection, the purposes for which your personal data will be processed, to whom and for what purposes your processed personal data may be transferred, and the rights of personal data subjects.

Methods of Providing Information:

Policies and Information Notices: We inform personal data subjects through this Policy and the “Information Notice” available on our website at <https://www.istanbulretina.com>. These documents provide detailed explanations regarding all processes related to the processing of personal data and the rights of data subjects.

Right to Application: To enable personal data subjects to exercise their rights under the Personal Data Protection Law No. 6698 and other relevant legislation, we have provided a Data Controller Application Form on our website at <https://www.istanbulretina.com/>. Through this form, data subjects can submit the necessary applications to exercise their rights.

Topics on Which We Provide Information Under Our Obligation to Inform:

- The method and legal grounds for collecting your personal data,
- The purposes for which your personal data will be processed,
- To whom and for what purposes your processed personal data may be transferred,
- The rights of personal data subjects under the KVKK and how these rights can be exercised.

In this context, as Istanbul Retina Institute, we commit to fulfilling our obligation of transparency and informing you at every stage of processing your personal data.

VII. RIGHTS OF DATA SUBJECTS

In accordance with Article 11 of the KVKK, data subjects have the following rights:

- To learn whether their personal data is being processed,
- To request information regarding the processing of their personal data,
- To learn the purpose of processing their personal data and whether it is being used in accordance with that purpose,
- To know the third parties to whom their personal data is transferred, whether domestically or abroad,
- To request the correction of their personal data if it is incomplete or inaccurately processed,
- To request the deletion or destruction of their personal data,
- To object to a result that arises against them through the analysis of their processed data exclusively by automated systems,
- To request compensation for damages if they suffer harm due to the unlawful processing of their personal data.

Data subjects can exercise their rights by filling out the "Personal Data Subject Application Form" available on our website at <https://www.istanbulretina.com/>. The completed form can be personally delivered to "Esentepe Hakkı Yeten Cad. Unimed Center No:19/7, Fulya, 34394 Şişli/Istanbul" or sent to our registered electronic mail address at istanbulretina@hs01.kep.tr.

VIII. DATA SECURITY MEASURES

As Istanbul Retina Institute, in accordance with Article 12 of the KVKK, we take the necessary legal, technical, and administrative measures to ensure the security and confidentiality of your personal data and special categories of personal data. The data security policies adopted by our Institute are as follows:

- Training and Awareness: We provide regular training to our employees on the lawful processing of personal data and data security. Additionally, we require our

employees to sign a confidentiality agreement regarding the confidentiality and restricted use of personal data they acquire during their employment. This commitment remains valid even after the employee leaves the job.

- Access and Usage Controls: Institutional policies on access, information security, usage, storage, and disposal are implemented to protect personal data. Data access rights are determined based on the nature of the data to be protected, and necessary technical and administrative measures are taken to prevent unauthorized access.
- Authority Management: The authority levels of our employees are periodically reviewed. When employees change roles or leave the organization, their access rights are immediately revoked, and they are required to return any devices or other inventory provided by the data controller.
- Cloud Security: If personal data is stored in the cloud, its security is ensured. Contracts with cloud providers include commitments to maintain data security standards.
- Physical Security: Physical environments where special categories of personal data are stored are protected against external risks such as electrical leaks, fire, flooding, and theft, and unauthorized access is prevented.
- Data Transfer: Your special category health data is shared only with individuals you specify via email and is transmitted in a secure manner in a classified document format when in physical form.
- Cybersecurity: Our Institute implements firewalls, up-to-date antivirus systems, and other cybersecurity measures to protect against cyber-attacks. These measures are regularly reviewed, and their implementation is continuously monitored.

IX. DATA RETENTION AND DESTRUCTION POLICY

Istanbul Retina Institute retains personal data for the periods specified in the relevant legal regulations. Personal data whose retention period has expired, or where the purpose of processing no longer exists, are deleted, destroyed, or anonymized. These processes are carried out in compliance with the relevant legislation and are documented accordingly.

X. POLICY UPDATING AND ENFORCEMENT

This policy is regularly reviewed and updated according to current legislation and practices. Any changes made shall come into effect on the date of publication and will be communicated to the relevant parties.

XI. RESPONSIBILITY AND SUPERVISION

Istanbul Retina Institute is responsible for the implementation and supervision of this policy, and all employees are required to comply with it.