

## DISCLOSURE TEXT TO PATIENTS REGARDING THE PROCESSING

## OF THEIR PERSONAL DATA

### I. Data Controller

In accordance with the Personal Data Protection Act No. 6698 ("Act"), your personal data is processed by us ("or "Company") as data controller in the context described below.

## II. Methods and Legal Basis of Collecting Personal Data

\* Our company collects personal data directly from you, our patients, from the contractual relationship between you and us, from our internet branch, mobile applications, social media accounts, emails, mails, faxes, notifications from administrative and judicial authorities and other communication channels, in accordance with the conditions for processing personal data specified in the law and in accordance with the following legal reasons specified in Articles 5 and 6 of the law, in direct proportion to the purposes specified below, in particular for the purposes of performing the relationship between you and us and ensuring compliance of the activities with the legislation:

It is necessary to process your personal data, provided that we are establishing a contractual relationship with you or it is directly related to our performance obligation arising from that contract (for example, processing your identity information, contact data and related data during the contract establishment phase).

- \* It is mandatory for the establishment, realisation or protection of a right (e.g. management and planning of health insurance processes, ensuring the security of information, ensuring the security of legal transactions, monitoring and executing legal cases, storage of personal data that may be required during the statute of limitations period for litigation).
- \* The process by which we process your personal data is explicitly stipulated in the laws (e.g. keeping records of transactions within the framework of the law and Act No. 5651).
- \* Situations that are mandatory to fulfil our legal obligations (processing of your personal data due to the performance of financial, tax and similar obligations, fulfilment of requests in accordance with the law within the scope of regulatory and supervisory activities)
- \* Provided that it is mandatory in line with our legitimate interests, provided that it does not harm your fundamental rights and freedoms (for example, the execution / supervision of business activities, ensuring the security of data controller operations, payment records in the examinations required to be carried out in the Company's processes such as mergers, divisions and acquisitions, submission of documents that may contain your personal data to the relevant parties / institutions)
- \* Your explicit consent when required (for example, transfer of your biometric data to SSI, etc.)

# III. For What Purpose Personal Data Will Be Processed

Your personal data may be processed for the purposes specified below, which are conditional upon you providing us with such data, including establishing a contractual relationship with you and managing all stages of that contractual process, ensuring the security of information and legal transactions and fulfilling our legal obligations:

- \* Execution of information security processes: to ensure transaction security in your diagnostic and processing procedures, to take the necessary steps to ensure the timeliness and accuracy of the processed data, to establish and operate the information infrastructure, to ensure physical and cyber security, to ensure the security of the Internet branch, to ensure transaction security and to process IP data, MAC addresses and similar data as well as log records for this purpose [identity, communication, enquiry/complaint/reputation management data, call centre records].
- \* Carrying out audit/ethical activities: Carrying out audit activities during your diagnostic and treatment procedures, detecting and preventing fraudulent transactions, managing internal control and audit activities [identity data, contact data, financial data, health data, request/complaint/reputation management data].
- \* Execution of activities in compliance with legislation: Ensuring compliance with legal rules in business processes, in particular Law 6698, ensuring that our activities are carried out in accordance with internal procedures and relevant regulations, planning and executing activities [identity data, communication data, financial data, request/complaint/reputation management data, health data].

Execution of financial and accounting affairs: Execution of financial and accounting processes based on this information during your diagnostic and treatment procedures, monitoring of accounting and purchasing operations [identity, communication data, financial data].



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- \* Follow-up and execution of legal matters: Follow-up of contractual processes and/or legal matters and requests, execution of alternative dispute resolution methods and litigation processes, management of processes with notaries, judicial and administrative authorities [court case reports, traffic accident reports]. Execution of communication activities: If necessary, contacting you based on the information you have provided, providing information about your contract, making payment reminders, contacting you by SMS, email and telephone in the context of contract execution, planning and/or executing after-sales service activities [identity, communication, call centre records, financial data].
- \* Execution/Supervision of Business Activities: Carrying out diagnostic and treatment procedures and ensuring the supervision of the business activities we perform, planning internal reporting and business development activities, conducting patient contacts and follow-up of clinic employees [identity, contact, financial data, request/complaint/reputation management data]

Execution of Goods / Service Sales Processes: In online appointment, technical support and management processes of your personal data use of [identity, contact, financial, audio, request/complaint/reputation management data]

- \* Execution of Patient Relationship Management Processes : Regarding the diagnosis and treatment services provided to you
- managing our relationships, meeting your requests and providing feedback [identity, contact data]

Execution of Supply Chain Management Processes: Execution of processes related to business partners, suppliers and other stakeholders about diagnosis and treatment procedures [identity, contact, financial data]

\* Providing Information to Authorised Persons, Institutions and Organisations: It is processed for the purposes of providing information in accordance with the legislation, meeting the requests from legal authorities [identity, communication, financial, health data].

## IV. Transfer Of Processed Personal Data

Our company takes care to process your personal data in accordance with the principles of "need to know" and "need to use", by ensuring the necessary data minimisation and taking the necessary technical and administrative security measures. Since the execution or supervision of business activities, ensuring business continuity, and the operation of digital infrastructures necessitate continuous data flow with different stakeholders, we are obliged to transfer the personal data we process to third parties for certain purposes. In addition, it is very important that your personal data is accurate and up-to-date in order to fulfil its contractual and legal obligations fully and properly. For this purpose, we have to work with various business partners and service providers.

Your personal data, in line with and limited to the fulfilment of the above-mentioned purposes;

With business partners and service providers providing call centre services for the provision of diagnosis and treatment services.

- \* With insurance companies and agencies within the scope of private health insurance
- \* Carrying out transactions to be carried out within the scope of contract or transfer of receivables or financing with the parties involved in the realisation of these transactions for the purposes of
- \* Management of financial and accounting processes, identification and assessment of risks, prevention of frauds with our partners, consultants and service providers, banks, financial advisors
- \* With the e-invoice business partner to send the e-invoice to the patient electronically; with cargo and courier companies for physical contract or invoice delivery
- \* To fulfil tax obligations with tax offices, invoices and collection receipts during tax audits with representatives of the Ministry of Finance
- \* In addition, with our business partners and service providers who provide, operate or provide services to our IT infrastructure, with lawyers and other consultants for the purposes of executing contract processes and litigation/execution proceedings, with our business partners providing private integrator, independent audit, customs, financial advisor/accounting services, with legally authorised public institutions and private persons or organisations and third parties, lawyers, auditors, forensic IT experts within the scope of fulfilling legal obligations, cyber security consultants, tax consultants and other third parties and business partners from whom we receive consultancy and services, regulatory and supervisory institutions and other official institutions such as courts and enforcement offices, our shareholders in all processes, execution of risk management and financial reporting processes, other public institutions or organisations authorised to request your personal data, limited to the purposes specified in this disclosure text.



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# V. Rights of the Person Concerned

As the person whose personal data is processed, you may submit your requests within the scope of Article 11 of the Law regulating the rights of the data subject (learning about personal data processing, requesting information about the processing, learning the suitability of the processing for the purpose, knowing the persons to whom the processing is transferred, requesting correction of incomplete or incorrect processing, requesting deletion or destruction, requesting notification of all automated transactions to third parties, objecting to analysis, requesting compensation for damages) In order to use it according to the Communiqué on the Procedures and Principles of Application to the Data Controller, you can contact Mansuroğlu Mah. 288/4 sok. No:9/D and you can use the form at www.wiseandsmile.com.tr.

## **EXPLICIT CONSENT**

Within the scope of the "Patient Clarification Text" notified and read by me, I hereby accept, declare and undertake that I consent to the processing of my health information, which is special quality personal data, limited to the purposes of conducting private health insurance processes, establishing side rights for me, planning and execution of business processes, and that I consent to the transfer of my special quality personal data to the recipient groups in Turkey and abroad specified in the Clarification Text, limited to the specified purposes.

In this context, I also declare that I have been informed that I have the right and authority to withdraw my explicit consent I have given regarding the processing and / or transfer of my personal data processed and / or transferred based on my explicit consent; regarding the rights granted to me by Article 11 of Law No. 6698 regarding the processing and / or transfer of my personal data; finally, I declare that I have been informed about how I can exercise my rights granted to me by Article 11 of Law No. 6698.

... I agree ... I do not agree

Name and Surname:

Date : Signature :