

CLARIFICATION TEXT FOR STAFF

INFORMATION NOTICE FOR EMPLOYEES

WITHIN THE SCOPE OF LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA

Purpose and Scope of the Information Notice

As **NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ**, we take necessary measures to protect your personal data in accordance with Law No. 6698 on the Protection of Personal Data ("KVKK" or "Law"). We process your personal data as a "data controller" for the reasons and methods explained below, in compliance with the KVKK and relevant legal regulations.

This Information Notice Regarding the Processing of Personal Data by **NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ** is prepared in line with Article 10 of KVKK titled "Obligation of the Data Controller to Inform". It aims to transparently inform you about the identity of the data controller, the method and legal basis for collecting personal data, the purposes for which the data is processed, to whom and for what purpose the data may be transferred, the data processing period, and your rights listed in Article 11 of KVKK. The explanations regarding "Your Personal Data" in this notice also include "Special Categories of Personal Data."

Data Controller

Company Title: NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ

Address: İmbatlı Mah. 6076 Sok. No:12/F Yeni Girne-Karşıyaka/İZMİR

(In this Information Notice, the company may also be referred to as "the Company" or "My Nova Oral and Dental Health Clinic".)

Method and Legal Basis for Collecting Your Personal Data

Your personal data may be collected verbally, in writing, or electronically through automatic or non-automatic means via the Company's affiliated units, social media platforms, software used within the company, security cameras, and similar means. Personal data will be created and updated throughout the continuation of your relationship with the Company and may be stored in both digital and physical environments.

Your personal data may be processed and transferred in line with the purposes listed under the "Processed Personal Data and Purposes of Processing" heading, based on your explicit consent as per Article 5(1) of the Law or without the need for consent under the conditions specified in Article 5(2) (a, c, ç, e, f) of the Law.

Special categories of personal data (excluding health and sexual life data) may also be processed under the same conditions. Health-related personal data may only be processed with your explicit consent or by authorized persons under the obligation of confidentiality for the purposes such as public health protection, preventive medicine, medical diagnosis, treatment and care services, and management of health services and their financing.

Processed Personal Data and Purposes of Processing

Your personal data are securely processed in accordance with the Law to fulfill legal obligations or to provide more efficient services.

Data Category	Examples
Identity	Name, Surname, Date/Place of Birth, ID Number, Gender, Nationality, Parents' Names, Social Security Number
Contact	Phone Number, Email Address, Residential Address
Personnel	SGK Registration, Certificates, Payroll Info, CV, Disciplinary Records
Physical Security	Entry/exit logs, CCTV footage
Visual & Audio	Photos
IT Security	IP address, Website logs, Passwords, Usernames
Financial	Bank Account, IBAN
Professional Experience	Institution info, Chamber registration, Certifications, Diploma, Language skills
Biometric	Fingerprints, Facial recognition
Health	Blood Type, Medical History, Test Results, Medical Reports, Allergies

Your data may be processed for purposes including but not limited to:

- Conducting operations to provide services to individuals or organizations related to the company,
- Ensuring the safety and legal security of people in company premises,
- Storing CCTV footage for security and discipline,
- Complying with laws such as the Labor Law, Occupational Health and Safety Law, Tax Procedure Law, Social Insurance and General Health Insurance Law, and other related regulations,
- Fulfilling duties assigned by competent authorities,

- Organizing civil and social activities for employees,
- Responding to legal or administrative information requests,
- Managing human resources processes and policies,
- Planning and managing financing and invoicing,
- Employee training and career development,
- Participation in training/seminar activities,
- Fulfilling obligations under agreements with insurance companies or third parties,
- Implementing all necessary technical and administrative security measures.

Transfer of Personal Data

Your data may be transferred under the relevant conditions of KVKK Articles 8 and 9 to:

- Legally authorized individuals/institutions,
- Insurance companies, banks,
- Lawyers or law firms for legal matters,
- Shareholders, affiliates,
- Auditors, consultants, business partners,
- Domestic/foreign organizations we contract with or cooperate with.

Data Processing and Retention Period

Your personal data will be processed for the time necessary to fulfill the purposes outlined in this notice, in accordance with the legal data retention periods specified in the relevant legislation. If legal time periods are amended, those changes will be reflected.

Data will be deleted, destroyed, or anonymized once the purpose of processing ceases and after expiration of legal retention periods. For detailed information on data retention periods, you may contact us using the addresses provided under "Rights of the Data Subject."

Rights of the Data Subject

As the data subject, you can submit your requests under Article 11 of the Law in writing to:
İmbatlı Mah. 6076 Sok. No:12/F Yeni Girne-Karşıyaka/İZMİR
or electronically to: **ceyhuncesit@mynova.org**

A more detailed regulation is available in the **NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ Personal Data Application and Response Procedure.**