

CLARIFICATION TEXT FOR THE PATIENT

INFORMATION NOTICE FOR PATIENTS UNDER THE LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA

Purpose and Scope of the Information Notice

As **NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY** (hereinafter referred to as “the Company” or “My Nova Oral and Dental Health Clinic”), we take measures to protect your personal data in accordance with the Law No. 6698 on the Protection of Personal Data (“KVKK” or “the Law”). We process your personal data as a "data controller" within the scope of KVKK and relevant legal regulations, for the reasons and methods explained below.

This Information Notice on the Processing of Personal Data by NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY is prepared in order to transparently inform you, under Article 10 of KVKK titled “Obligation of the Data Controller to Inform”, regarding the identity of the data controller, methods and legal reasons for collecting personal data, the purposes for which it is processed, to whom and for what purposes it may be transferred, the data processing period, and your rights listed under Article 11 of the KVKK. The term “Your Personal Data” in this Information Notice also includes “Your Sensitive Personal Data.”

Data Controller

Company Title: NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY

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

(Hereinafter referred to as “the Company” or “My Nova Oral and Dental Health Clinic” within this Information Notice.)

Method and Legal Basis of 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 units, website, social media channels, call center, mobile applications, or similar channels. It may also be created and updated during the course of your relationship with the Company and stored in both digital and physical environments.

Your personal data may be processed and transferred in accordance with Article 5(1) of the Law with your explicit consent or without explicit consent based on the legal grounds specified in Article 5(2) (a, c, ç, e, and f) of the Law, and for the purposes stated under the heading “Processed Personal Data and Purposes of Processing.”

Your sensitive personal data, except for health and sexual life, may be processed under Article 6(2) of the Law with your explicit consent, or under Article 6(3) when permitted by laws.

Your sensitive personal data regarding your health will be collected for the purposes listed under “Processed Personal Data and Purposes of Processing” and under Article 6(2) with your explicit consent or under Article 6(3) only by authorized persons under confidentiality

obligation, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and financing.

Processed Personal Data and Purposes of Processing

Your personal data is processed securely and in compliance with the Personal Data Protection Law for legal obligations and to provide better services during Company operations.

The following categories of personal data may be collected:

- **Contact Data:** Data used to reach the individual (phone number, address, email, etc.).
- **Identity Data:** Data relating to the individual's identity (name-surname, ID number, parents' names, place/date of birth, gender, ID document number, ID photocopy, tax number, social security number, nationality, employee card, signature, etc.).
- **Health Data:** Data relating to the individual's health (blood type, medical history, check-up results, consultation reports, diet forms, surgery details, treatment methods, disease types, medication usage, medical values, test results, etc.).
- **Digital Trace Data:** Digital traces resulting from data processing (log records, etc.).
- **Financial Data:** Data relating to the individual's financial information (bank account number, IBAN, card information, bank name, financial profile, mail order forms, credit score, etc.).
- **Visual and Audio Records:** Visual and audio data of the individual (photographs).
- **Physical Space Security Data:** Data related to security camera recordings in areas the individual is present (CCTV footage, photos, etc.).
- **Transaction Security Data:** Data related to the security of individual transactions (IP address, etc.).

These data may be processed for purposes including:

- Enabling the Company's units to ensure that individuals/entities with a relationship with the Company benefit from the Company's services,
- Ensuring the physical and legal safety of people and property in locations where the Company operates,
- Recording camera footage in physical areas to maintain discipline, security, and audits,

- Complying with legal requirements under laws and secondary regulations such as the Turkish Commercial Code, Turkish Code of Obligations, Consumer Protection Law, Personal Data Protection Law, Tax Procedure Law, Social Insurance and General Health Insurance Law, Fundamental Law on Health Services, and relevant Ministry of Health regulations,
- Fulfilling oversight and regulation duties by authorized institutions,
- Complying with demands by judicial bodies or administrative authorities,
- Analyzing and improving service quality and customer satisfaction, producing statistical and scientific data,
- Conducting marketing research, promotions, handling complaints and suggestions, and communicating with you through provided contact channels,
- Managing and planning the financing and invoicing of services provided,
- Taking necessary technical and administrative measures for data security,

Your personal data will be processed within the legal framework specified in Articles 5 and 6 of the Law.

Recipients and Purposes of Personal Data Transfers

Your personal data may be transferred—provided necessary technical and administrative safeguards are in place—only when necessary and for the purposes stated above, to the following parties:

- Authorized individuals/institutions permitted by law,
- Private insurance companies and banks,
- Attorneys or law firms for legal affairs,
- Financial advisors for financial/accounting operations,
- Direct/indirect domestic shareholders,
- Our affiliates and/or subsidiaries,
- Consultants and business partners,
- Domestic/foreign organizations with which we have contractual relationships

In accordance with Article 8 of the Law, your personal data may be transferred without explicit consent if one of the conditions in Article 5(2) is met, or with explicit consent as stated in Article 9 of the Law.

Data Processing and Retention Period

Your personal data will be processed within the purposes stated in this Information Notice, for the period stipulated by applicable laws and statutory time limits that the Company and its affiliated centers are subject to. In the event of any change in these durations, new legal durations shall apply.

Your personal data will be processed as long as necessary and will be deleted, destroyed, or anonymized after the end of the retention period, in accordance with Company practices and commercial traditions. For detailed information about retention periods, you may contact us via the contact addresses listed under the “Rights of the Data Subject” section.

Rights of the Data Subject

As a data subject, you can exercise your rights listed in Article 11 of the Law by submitting a written request to “İmbatlı Mah. 6076 Sok. No:12/F Yeni Girne-Karşıyaka/İZMİR” or via email to ceyhuncesit@mynova.org. More detailed provisions are available in the Company’s “Personal Data Application and Response Procedure”.