

DATA ACCESS POLICY

NOVA DENTAL AND MEDICAL HİZMETLER LİMİTED ŞİRKETİ

PERSONAL DATA ACCESS POLICY

Purpose of Personal Data Access Policy

As the data controller, NOVA DENTAL AND MEDICAL HİZMETLER LİMİTED ŞİRKETİ ("My Nova Oral and Dental Health Center" or "Company") attaches great importance to the protection of personal data belonging to its customers, employees and other natural persons with whom it has a relationship. The aim of this Policy and other written policies for the processing and protection of personal data is to process and protect the personal data of our customers/patients, potential customers, employees, candidate employees, visitors, employees of institutions we cooperate with, employees of natural or legal persons with whom we have established business partnerships and third parties in accordance with the law.

Scope of Access to Personal Data

This Policy is related to the access to personal data of our customers, employees, job candidates, visitors, employees of institutions we cooperate with and third parties, processed automatically or non-automatically as part of any data recording system, and the personal data of persons working or working within NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ.

Personal data collected and stored in accordance with the Law on the Protection of Personal Data within NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ is accessible by a limited number of persons, limited to the activity, in order to complete certain works and transactions.

The data controller NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ takes all necessary technical and administrative measures to prevent unlawful access to personal data and to ensure the appropriate level of security.

Access authorizations are limited within NOVA DENTAL AND MEDICAL HİZMETLER LİMİTED ŞİRKETİ and authorizations are reviewed regularly.

In this context, the policy will include the procedure to be followed in the processes related to personal data processed and stored within NOVA DENTAL AND MEDICAL HİZMETLER LİMİTED ŞİRKETİ.

Departments that can access personal data within NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ and the access statuses to personal data are listed below:

Relevant Person Whose Personal Data Can Be Accessed

Persons Who Can Access Data - Departments

Data Access Status

Patient

- Information Technology
- Accounting
- Patient Services
- Patient Admission
- Polyclinic Services

File Server

Intranet (Portal)

ERP System

Company Computer

Printed Form

File (Physical)

Folder (Physical)

Access is provided via.

Employee

- Patient Services
- Information Technology
- Polyclinic Services
- Human Resources
- Law
- Quality
- Information Technology
- Finance

File Server

ERP Server

Intranet (Portal)

Company Computer

Printed Form

File (Physical)

Folder (Physical)

ERP System

access is provided via.

Employee Candidate

- Human Resources
- Information Technology
- Law

Printed Form

File (Physical)

Folder (Physical)

access is provided via.

Suppliers

- Information Technology
- Accounting

File Server

Mail

Intranet (Portal)

Company Computer

Printed Form

File (Physical)

Folder (Physical)

ERP System

access is provided via.

Business Partners (Real Persons)

- Information Technology

- Accounting

Mail

Company Computer

Printed Form

File (Physical)

Folder (Physical)

access is provided via.

Patient Relative

- Polyclinic Services

- Information Technology

- Accounting

- Patient Admission

File Server

Intranet (Portal)

Company Computer

Printed Form

File (Physical)

Folder (Physical)

access is provided via.

Visitor

- Information Processing

- Patient Admission

Camera Server

ERP System

Printed Form

File (Physical)

Folder (Physical)

access is provided via.

NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ persons who can access personal data;

Employee Access to Personal Data

NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ has determined provisions regarding confidentiality and personal data security in the Employment Contracts signed during the recruitment processes of employees and requests employees to comply with these provisions. The protection of personal data is also observed in the policies and commitments that are integral parts of Employment Contracts. Considering the roles, responsibilities and job descriptions of employees as a result of the trainings and information they receive, employees;

They can only access personal data related to their own job descriptions. Access to these personal data is in accordance with the processing purposes in accordance with Article 12 of the KVKK. NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ personnel cannot access personal data outside of their job descriptions.

Access to sensitive personal data is possible if the conditions are met in accordance with Article 6 of the KVKK. The personnel working within NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ provides access to the personal data of the customers under the obligation of confidentiality within the scope of the establishment or execution of the contract between NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ and the customers. Access of the personnel to sensitive personal data is possible with the provision of explicit consent, except in cases where it is clearly stipulated in the laws. The processing of health and sexual life data without explicit consent will only be carried out if the conditions

stipulated in the law are met; the data processing process in question within NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ will be carried out by the workplace physician.

The personnel cannot access personal data related to the work and activities outside of the job description. They are obliged to protect the personal data they learn within the job description and not to share it without permission. They cannot share the personal data they access by chance without permission.

Customer Access to Personal Data

Customers who have a relationship with NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ have the right to access personal data related only to themselves and limited to the personnel they communicate with. However, if the customer is the relevant person, they can exercise their rights in accordance with Article 11 of the KVKK.

Access to Personal Data by Third Parties, Shareholders and Business Partners

Third parties, shareholders and business partners can only access personal data in accordance with Article 5 of the KVKK, “provided that it is directly related to the establishment or performance of a contract”, “if it is mandatory for the data controller to fulfill its legal obligation” and “if it is clearly provided for in the laws”.

No content in this policy is legal advice and cannot be considered as legal advice. The legal legislation on that date was taken as basis when preparing the texts in question; differences may occur within the framework of changes in legislation that occur in the future.

NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ has set forth provisions regarding confidentiality and personal data security in contracts signed with third parties, and it is expected that these terms will be adhered to.