

DATA BREACH NOTIFICATION PROCEDURE NOVA DENTAL AND MEDICAL HİZMETLER LIMITED COMPANY

PERSONAL DATA BREACH NOTIFICATION PROCEDURE

Importance of Personal Data Breach Notification Procedure

According to Article 12, paragraph 5 of the Law on the Protection of Personal Data ("Law"), in the event that personal data processed is obtained by others through illegal means, the data controller shall notify the relevant person and the Personal Data Protection Board ("Board") of this situation as soon as possible, and the Board may, if necessary, announce this situation on its own website or by another method it deems appropriate. However, in the event of a data breach, a data breach response plan should be prepared by the data controller, including issues such as who will be reported to, who is responsible for the notifications to be made within the scope of the Law and the evaluation of the possible consequences of the data breach, and this plan should be reviewed at certain intervals.

It is recommended that a data breach response plan be prepared and reviewed at regular intervals, including issues such as who the data controller will report to in the event of a data breach, who will be responsible for the notifications to be made within the scope of the Law and the evaluation of the possible consequences of the data breach.

DEFINITIONS:

Relevant Person: The natural person whose personal data is processed.

Personal Data: Any information related to an identified or identifiable natural person.

Special Personal Data: Data related to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or union membership, health information, sexual life, criminal conviction and security measures of individuals, as well as biometric and genetic data.

Data Processor: The natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.

Data Controller: The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

Board: Personal Data Protection Authority

NOVA DENTAL VE MEDİKAL HİZMETLER LİMİTED ŞİRKETİ will be referred to as the data controller in this procedure.

What to Do in Case of a Data Breach or Detection of a Data Breach:

Detection of the Time of the Breach and Detection of the Source of the Breach

After the data controller determines the time of the breach, the source of the breach must be determined. It is necessary to determine the act that caused the breach. For example; Document/device theft or loss

Detection of Personal Data Categories Affected by the Breach

The data controller must determine which data is affected by the personal data breach by considering the data inventory.

Determination of the Number of Persons and Groups of Persons Affected by the Breach

It is necessary to determine which groups of persons are affected by the breach and the number of persons affected by the breach, considering the data inventory prepared by the data controller.

Determination of the Possible Results of the Data Breach

The possible results of the breach experienced by the data controller should be determined and its effects and results within the institution should be determined.

72-Hour Rule

The Board has decided that the expression "as soon as possible" should be interpreted as 72 hours and that the data controller should notify the Board without delay and within 72 hours at the latest from the date of learning about this situation. The Data Breach should be notified to the Board within 72 hours from the date of learning about it. If the data controller cannot notify the Board within 72 hours due to a justified reason, the reasons for the delay should be explained to the Board along with the notification to be made. Care should be taken to use the "Personal Data Breach Notification Form" on the Board's website as much as possible in the notification to be made to the Board. In cases where it is not possible to provide the information in the form at the same time, this information must be provided gradually without any delay.

Breach notifications to be made by the Data Controller can be made to the institution's address "Nasuh Akar Mah. 1407. Sok. No:4 06520 Balgat-Çankaya/Ankara" with the "Personal Data Breach Notification Form" or via the address "ihlalbildirim.kvkk.gov.tr".

Providing information to the relevant persons

Following the determination of the persons affected by the data breach by the data controller, the relevant persons must be notified within the shortest reasonable period of time, directly if the contact address of the relevant person can be reached, or by publishing it on the data controller's own website if it cannot be reached.

Additional information

The data controller must record information regarding data breaches, their effects and the measures taken and keep them ready for the Board's review.