

DISCLOSURE TEXT FOR THE WEBSITE

PRIVACY NOTICE FOR THE WEBSITE IN ACCORDANCE WITH LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY

Purpose and Scope of the Privacy Notice

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

This Privacy Notice on the Processing of Personal Data by NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY has been prepared to inform you as transparently as possible under Article 10 of KVKK, titled "Data Controller's Obligation to Inform." It covers the identity of the data controller, the method and legal basis for collecting your personal data, the purposes of data processing, to whom and for what purposes your data may be transferred, data processing periods, and your rights as set out in Article 11 of the Law. The explanations provided regarding "Your Personal Data" also include your "Sensitive Personal Data."

Data Controller

Company Name: 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" in this Privacy Notice.)

Method and Legal Basis for Collecting Personal Data

Your personal data may be collected verbally, in writing, or electronically through automatic or non-automatic methods via the Company's affiliated units, website, social media platforms, call center, mobile applications, and similar means. Your personal data may be created and updated throughout your relationship with the Company and may be stored both digitally and physically.

Your personal data may be processed and transferred in accordance with the purposes outlined under the heading "Personal Data Processed and Processing Purposes" based on your explicit consent as per Article 5(1) of KVKK or without explicit consent in accordance with the processing conditions stated in Article 5(2)(c), (e), and (f) of the Law.

Personal Data Processed and Processing Purposes

Your personal data is processed securely in accordance with the Personal Data Protection Law to comply with legal obligations or to provide better service in the Company's operations.

The following personal data may be collected:

- **Contact Data:** Data that can be used to contact the individual (phone number, address, email, etc.).
- **Identity Data:** Information related to personal identification (name, surname, Turkish ID number, etc.).
- **Transaction Security Data:** Digital traces resulting from the processing of the individual's information (IP address, website access logs, etc.).

Collected personal data will be processed for the following purposes:

- To enable real persons or legal entities (employees, visitors, suppliers, business partners, etc.) associated with the Company to benefit from the products and services offered by the Company and its affiliated units,
- To fulfill existing and potential legal and regulatory requirements arising from all applicable laws and secondary legislation,
- To fulfill auditing and regulatory functions conducted by authorized public institutions and professional organizations with public institution status,
- To meet information and document requests from judicial authorities and administrative bodies,
- To carry out listing, reporting, validation, and analysis regarding the use of products and services provided by our Company and affiliated units, to produce statistical and scientific data, improve products and services, increase satisfaction, and provide personalization for the user,
- To conduct market research, promotions, and necessary information activities related to our products and services, evaluate complaints and suggestions, and directly contact you through communication channels shared with the Company,
- To implement all technical and administrative measures necessary for system and application security.

Transfer of Processed Personal Data and Transfer Purposes

In line with the purposes listed above and by taking all necessary technical and administrative measures to ensure an appropriate level of security, your personal data may be transferred to:

- Persons, institutions, and/or organizations permitted by the relevant legislation,
- Lawyers or law firms for the purpose of pursuing legal affairs,
- Our direct/indirect domestic shareholders,
- Private insurance companies,
- Our affiliates and/or subsidiaries,
- Consultants, business partners,
- Domestic and/or international organizations with whom we have contractual relationships for services or collaborations,

These transfers will be carried out in accordance with the personal data processing conditions and purposes outlined in Articles 8 and 9 of the Law, based on one of the legal grounds in Article 5(2) or with your explicit consent.

Data Processing and Retention Period

Your personal data will be processed in line with the purposes stated in this Privacy Notice, and in accordance with data processing and limitation periods stated in the applicable laws and other related legislation. In case of any legislative amendments, the newly determined periods will be applied.

As per the principle of data minimization, your data will be processed for the time necessary to achieve the purposes described in this Notice, and in line with business practices. Once the processing period expires, your personal data will be deleted, destroyed, or anonymized. A breakdown of retention periods per process is provided below (if any).

Rights of the Data Subject

As a data subject, you may exercise your rights listed under Article 11 of KVKK by submitting your requests in accordance with the “Communiqué on the Procedures and Principles of Application to the Data Controller” in writing to the address “İmbatlı Mah. 6076 Sok. No:12/F Yeni Girne-Karşıyaka/İZMİR” or electronically to the email address **ceyhuncesit@mynova.org**. More detailed regulations are set forth in the Nova Dental and Medical Services Limited Company’s “Personal Data Application and Response Procedure.”