

PERSONAL DATA PROTECTION AND PROCESSING POLICY (GENERAL)

NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY (My Nova Oral and Dental Health Center)

INTRODUCTION

As the data controller, **NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY** ("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 individuals it interacts with. Through this Policy and other written policies, it is aimed to ensure that the personal data of customers, potential customers, employees, employee candidates, visitors, employees of institutions we cooperate with, employees of the group of companies we are part of, and third parties are processed and protected in accordance with the law.

In this context, My Nova Oral and Dental Health Center takes the necessary administrative and technical measures in accordance with Law No. 6698 on the Protection of Personal Data and related legislation.

This Policy outlines the fundamental principles adopted by My Nova Oral and Dental Health Center for the personal data processing procedures, including:

- Processing personal data with consent,
- Processing personal data in accordance with the law and principles of honesty,
- Ensuring personal data is accurate and kept up-to-date where necessary,
- Processing data for specific, clear, and legitimate purposes,
- Processing data in a manner that is relevant, limited, and proportionate to the purpose,
- Storing data only for the duration required by legislation or the purpose of processing,
- Informing and enlightening the data subject,
- Providing the necessary infrastructure for the exercise of rights by data subjects,
- Taking necessary precautions for the protection of personal data,
- Acting in accordance with legislation and Personal Data Protection Authority (PDPA) regulations when determining and applying the purposes of data processing and during third-party data transfers,
- Special regulation of processing and protection of sensitive personal data.

PURPOSE OF THE POLICY

The primary purpose of this Policy is to inform about the systems adopted by My Nova Oral and Dental Health Center regarding the lawful processing of personal data and to ensure transparency towards individuals with whom our company is associated.

SCOPE OF THE POLICY

This Policy applies to all personal data of our customers/patients, employees, employee candidates, visitors, employees of institutions we cooperate with, and third parties, whether processed by automated means or non-automated means, provided they form part of a data recording system.

PERSONAL DATA PROTECTION MEASURES

In accordance with Article 12 of the Personal Data Protection Law, My Nova Oral and Dental Health Center takes necessary technical and administrative measures to prevent the unlawful processing and access of personal data and to ensure the protection of data, and conducts or has conducted necessary audits accordingly.

4.1. Measures Taken to Ensure Lawful Processing and Prevent Unlawful Access

4.1.1. Technical Measures

Major technical measures taken by My Nova Oral and Dental Health Center include:

- Ensuring network and application security,
- Implementation of key management,
- Taking security measures within the scope of IT systems procurement, development, and maintenance,
- Authorization matrix for employees,
- Terminating access rights of employees who change roles or leave the organization,
- Use of up-to-date antivirus systems,
- Use of firewalls,

- Implementing physical access control for areas storing personal data,
- Use of user account management and access control systems,
- Keeping log records without user intervention,
- Encrypting sensitive personal data sent via email and using KEP (registered email) or corporate email accounts,
- Using secure encryption/cryptographic keys managed by separate units,
- Continuous monitoring of cybersecurity measures,
- Use of encryption,
- Encrypting sensitive personal data transferred via USB, CD, or DVD media.

4.1.2. Administrative Measures

Administrative measures taken by My Nova Oral and Dental Health Center include:

- Disciplinary regulations for employees that include data security provisions,
- Regular training and awareness activities for employees,
- Preparation and implementation of policies on access, information security, data storage, and destruction,
- Execution of confidentiality undertakings,
- Inclusion of data security clauses in contracts,
- Taking additional precautions for personal data transferred in paper format and marking such documents as confidential,
- Establishment of personal data security policies and procedures,
- Prompt reporting of personal data security breaches,
- Monitoring personal data security,
- Protection of physical environments containing personal data from external threats (fire, flood, etc.),
- Ensuring the security of environments containing personal data,

- Data minimization as much as possible,
 - Identification of existing risks and threats,
 - Establishment and implementation of protocols and procedures for sensitive personal data,
 - Raising awareness of data processors regarding data security,
 - Auditing data processors for data security compliance,
 - Conducting periodic and/or random internal audits.
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4.2. Auditing Measures Related to Personal Data Protection

My Nova Oral and Dental Health Center has a **Personal Data Protection Committee**. The committee performs audits directly or through qualified third parties to ensure compliance with the Law within the organization, as required by Article 12. Identified violations or non-conformities are reported to the Information Security Officer within the committee to take necessary actions.

In case of outsourcing services for data storage due to technical requirements, contracts with the related service providers include provisions requiring them to take adequate security measures to protect the personal data and ensure compliance within their own organization.

Furthermore, during recruitment and within internal disciplinary policies, My Nova Oral and Dental Health Center includes contractual provisions that require personnel to comply with personal data protection measures.

RIGHTS AND REQUESTS OF DATA SUBJECTS

In accordance with Article 13 of the Law, My Nova Oral and Dental Health Center has created procedures and technical infrastructure to handle requests of data subjects, including cases where the request does not meet legal submission conditions, by redirecting them to written request templates.

Data subjects whose personal data is processed may submit their requests regarding their rights using one of the following methods:

- In-person application with identity verification,
- In writing,

- Via registered electronic mail (KEP), secure electronic signature, mobile signature,
- Or via an email previously notified to and recorded by My Nova Oral and Dental Health Center,
- Or through software/applications developed for such purposes.

Upon receipt of the request, the Company will respond free of charge within thirty (30) days, depending on the nature of the request.

Data subjects may exercise all their rights stipulated in the Law, including information on all processing activities, purposes, and data transfers, via properly submitted requests.

PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

Certain personal data are given special importance under the Personal Data Protection Law ("KVK Law") due to the risk of causing victimization or discrimination if processed unlawfully. These data include information regarding race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothing, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

My Nova Oral and Dental Health Center exercises utmost care in the protection of special categories of personal data, which are classified as "sensitive" under the KVK Law and processed lawfully. In this context, the technical and administrative measures taken for the protection of personal data are implemented with particular care for sensitive personal data, and necessary audits are conducted within My Nova Oral and Dental Health Center.

TRAINING OF MY NOVA ORAL AND DENTAL HEALTH CENTER EMPLOYEES ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

My Nova Oral and Dental Health Center organizes necessary training sessions for its employees in order to raise awareness about preventing the unlawful processing of personal data, preventing unauthorized access to data, and ensuring data security.

ISSUES RELATED TO PERSONAL DATA PROCESSING

My Nova Oral and Dental Health Center processes personal data in compliance with Article 20 of the Constitution and Article 4 of the KVK Law in accordance with the principles of lawfulness and fairness, ensuring the protection of public health, accuracy and, where necessary, up-to-date information; for specific, explicit and legitimate purposes; and in a manner that is relevant, limited, and proportionate to the purpose. My Nova Oral and Dental Health Center retains personal data for the period required by relevant laws or as necessary for the purposes of processing.

The Center processes personal information belonging to its customers, employees, visitors, supplier company employees, and third parties—such as identity data (name, surname, Turkish ID number, gender, age, date of birth), contact information (email address, phone number, address, IP address), professional data, visual and audio data, educational

background, family member information, religious belief, and association/foundation/union membership. These data are processed for purposes including effective service delivery, service improvement, informing individuals about innovations, fulfilling contractual obligations, conducting operations, and meeting financial/legal/commercial obligations.

My Nova Oral and Dental Health Center informs individuals whose data is processed in accordance with Article 10 of the KVK Law, and seeks their consent where necessary, processing personal data based on the following criteria:

8.1. Processing in Accordance with Law and the Principle of Good Faith

My Nova Oral and Dental Health Center processes personal data in line with legal regulations and the general principles of trust and honesty. In accordance with the principle of good faith, it considers the interests and reasonable expectations of data subjects while pursuing its data processing objectives.

8.2. Ensuring Personal Data Are Accurate and Up-to-Date

Maintaining accurate and up-to-date personal data is essential for protecting the fundamental rights and freedoms of individuals. The Center has a proactive obligation to ensure accuracy and updates, and keeps communication channels open for individuals to update their information.

8.3. Processing for Specific, Explicit, and Legitimate Purposes

The Center clearly defines lawful and legitimate purposes for processing personal data and limits the scope of data processing to what is necessary for its operations.

8.4. Being Relevant, Limited, and Proportionate to the Purpose

The Center processes personal data only for relevant and necessary purposes and avoids processing data not needed to achieve these goals.

8.5. Retention for the Duration Stipulated by Law or Required for the Purpose

My Nova Oral and Dental Health Center retains personal data only as long as stipulated by relevant legislation or necessary for processing purposes. If a specific retention period is defined in law, it is followed; otherwise, data are stored according to the retention periods stated in the Internal Retention Policy. After these periods, personal data are deleted, destroyed, or anonymized, depending on their nature and purpose.

INFORMATION AND NOTIFICATION TO THE DATA SUBJECT

In accordance with Article 10 of the KVK Law, My Nova Oral and Dental Health Center informs data subjects during the collection of their personal data. This includes information about the identity of the data controller and its representative (if any), the purpose of data processing, potential recipients of data, the method and legal basis of data collection, and the rights of the data subjects. Pre-Information Notices and Disclosure Statements are placed in visible common areas within the company, and the Center's website includes the customer disclosure statement, cookie policy, and application form along with this policy.

TRANSFER OF PERSONAL DATA

In line with lawful data processing purposes and with necessary security measures, My Nova Oral and Dental Health Center may transfer personal data and sensitive personal data to third parties. Data may be transferred to foreign countries with adequate protection as

declared by the KVK Board or, in the absence of such protection, to countries where sufficient protection is guaranteed in writing by the data controllers in Turkey and the recipient country, provided that KVK Board approval is obtained. The conditions for data transfer are as follows:

- If there is a clear regulation in the law allowing the transfer of personal data,
- If the transfer is necessary for the establishment or execution of a contract,
- If it is necessary for the Center to fulfill its legal obligations,
- If the transfer is necessary for the establishment, exercise, or protection of a right,
- If it does not harm the fundamental rights and freedoms of the data subject and is necessary for the legitimate interests of the Center.

MY NOVA ORAL AND DENTAL HEALTH CENTER'S PERSONAL DATA INVENTORY AND DATA CLASSIFICATION

The Center processes the personal data categories listed below (not limited to them) in accordance with the legitimate and lawful purposes outlined in Articles 5 and 6 of the KVK Law and based on one or more of the personal data processing conditions specified therein. The Center complies with all obligations stated in the KVK Law, including the general principles in Article 4, and informs relevant data subjects accordingly.

In accordance with the Regulation on the Registry of Data Controllers issued by the Personal Data Protection Authority, My Nova Oral and Dental Health Center has created a personal data inventory. This inventory includes data categories, data sources, purposes of processing, processing procedures, recipient groups, and retention periods.

Elbette! Aşağıda verdiğiniz metnin ve tablonun İngilizce çevirisini bulabilirsiniz:

CATEGORIZATION OF PERSONAL DATA

CATEGORY OF PERSONAL DATA	DESCRIPTION
Contact Data	This group includes data that can be used to contact the individual (Phone number, address, email address, IP address).
Identity Data	This group includes data related to the identity of the individual (Full name, Turkish ID number, mother's name, father's name, place of birth, date of birth, gender, ID card serial number, photocopy of ID, tax number, social security number, nationality, employee ID card).

Visual/Audio Data	This group includes visual and audio data related to the individual (Photograph, audio recordings, camera footage, photocopy/scan of driver's license, photocopy/scan of ID card, photocopy/scan of passport).
Digital Trace Data	This group includes digital traces resulting from the processing of the individual's information (Logs).
Financial Data	This group includes the individual's financial information (Bank account number, IBAN, card details, bank name, financial profile, mail order form, credit score).
Biometric/Genetic Data	This group includes biometric/genetic data of the individual (Fingerprint, palm print, genetic information, vein pattern).
Customer Transaction Data	This category includes data such as call center recordings, invoices, promissory notes, check information, counter receipts, order details, and request information.
Legal Transaction Data	This category includes data such as correspondence with judicial authorities and information within legal case files.
Personnel Data	This category includes data such as payroll information, disciplinary investigation records, employment entry documents, asset declaration information, CV details, and performance evaluation reports.
Physical Space Security Data	This category includes data such as entry and exit records of employees and visitors, and camera recordings.
Transaction Security Data	This category includes data such as IP address information, website login/logout information, passwords and passcodes.
Professional Experience Data	This category includes data such as diploma details, attended courses, in-service training records, certificates, and transcripts.
Health Data	This category includes data such as disability status, blood type, personal health information, and information on medical devices and prosthetics used.
Digital Trace Data	This group includes digital traces resulting from the processing of the individual's information.

Transaction Security Data This category includes data such as IP address information, website login/logout information, passwords and passcodes.

My Nova Oral and Dental Health Center has identified the above-listed categories within the scope of its data processing activities and based on the types of data used within the organization, as documented in the My Nova Oral and Dental Health Center Personal Data Processing Inventory, and in accordance with the My Nova Oral and Dental Health Center Data Retention and Destruction Policy.