

POLICY ON THE PROTECTION AND PROCESSING OF SENSITIVE PERSONAL DATA NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY

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INTRODUCTION

Sensitive personal data are those which, if disclosed, may lead to discrimination or victimization of the individual. For this reason, the Law on the Protection of Personal Data (KVKK) assigns special importance to sensitive personal data compared to other types of personal data and requires that they be protected more rigorously.

This policy has been prepared to define the procedures and information within the data controller regarding the protection of sensitive personal data.

Within the scope of this policy, the Law on the Protection of Personal Data will be referred to as the "Law", the data controller NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY will be referred to as "My Nova Oral and Dental Health Center" or the "Company". The Policy on the Protection and Processing of Sensitive Personal Data will be referred to as the "Policy", and the Personal Data Protection Board will be referred to as the "Board".

PURPOSE OF THE POLICY

At My Nova Oral and Dental Health Center, sensitive personal data, as defined in the Law, are processed lawfully, and special care is taken to protect such data.

In this regard, technical and administrative measures taken by My Nova Oral and Dental Health Center to protect personal data are implemented with particular attention in the case of sensitive personal data, and necessary audits are carried out within the organization.

Additionally, in accordance with Article 6, paragraph 4 of the Law, sufficient safeguards set forth by the Board are also implemented in the processing of sensitive personal data, and all activities are carried out in compliance with the Board's decisions.

SCOPE OF THE POLICY

This Policy on the Protection and Processing of Sensitive Personal Data sets forth the procedures and principles required for processing sensitive personal data within the framework of the Law, relevant regulations, and Board decisions, and in accordance with general principles.

It also explains the necessary administrative and technical measures for the protection of such data, as well as the sufficient safeguards determined by the Board.

DEFINITIONS

- **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. For the purposes of this policy, the data controller is accepted to be NOVA DENTAL AND MEDICAL SERVICES LIMITED COMPANY.
- **Sensitive Personal Data:** These include data related to a person's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothing, membership in associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data. Defined under Article 6 of the Law, such data are considered sensitive or special category personal data.
- **Explicit Consent:** Consent that is specific, informed, and freely given by the individual regarding a particular subject.
- **Data Subject:** The real person whose personal data is processed.
- **Processing of Personal Data:** Any operation performed on personal data, wholly or partially by automated means or otherwise as part of a data filing system, such as collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, retrieval, classification, or prevention of use.

PROCESSING OF SENSITIVE PERSONAL DATA AND PURPOSES

In accordance with Article 6 of the Law on the Protection of Personal Data, sensitive personal data may be processed with the explicit consent of the data subject. However, in certain cases specified by the Law, sensitive personal data may also be processed without the explicit consent of the data subject. In this context:

Sensitive personal data other than those related to health and sexual life will be processed in accordance with the purposes specified under the section "Your Processed Personal Data and Their Processing Purposes" and within the scope of Article 6, paragraph 2 of Law No. 6698, provided that explicit consent is obtained, or under Article 6, paragraph 3 where permitted by law.

Sensitive personal data concerning your health will be processed for the purposes specified under the section "Your Processed Personal Data and Their Processing Purposes" and within the scope of Article 6, paragraph 2 of Law No. 6698, provided that explicit consent is obtained, or under Article 6, paragraph 3, only by persons or institutions and organizations under the obligation of confidentiality, and for purposes such as protection of public health,

preventive medicine, medical diagnosis, treatment and care services, and the planning and management of healthcare services and their financing.

Certainly! Here's the English translation of the provided section:

PROCESSED PERSONAL DATA AND PURPOSES OF PROCESSING

The special sensitive personal data collected within the company may be processed for the following purposes:

- Managing Emergency Management Processes
- Managing Information Security Processes
- Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees
- Managing Employee Benefits and Entitlements
- Conducting Audits/Ethical Activities
- Conducting Training Activities
- Ensuring Compliance with Legislation in Activities
- Managing Finance and Accounting Activities
- Managing Processes Related to Company/Product/Service Loyalty
- Managing Assignment Processes
- Following up and Executing Legal Matters
- Managing Communication Activities
- Planning Human Resources Processes
- Carrying out/monitoring Business Activities
- Managing Occupational Health and Safety Activities
- Receiving and Evaluating Suggestions for Improving Work Processes
- Ensuring Business Continuity Activities

- Managing Procurement Processes for Goods/Services
- Managing Sales Processes for Goods/Services
- Managing Production and Operation Processes for Goods/Services
- Conducting Customer Satisfaction Activities
- Managing Risk Management Processes
- Managing Retention and Archiving Activities
- Managing Contract Processes
- Managing Strategic Planning Activities
- Tracking Requests/Complaints
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Persons, Institutions, and Organizations
- Providing necessary information in line with requests and inspections by regulatory and supervisory authorities
- Storing information related to data that must be retained according to relevant legislation
- For employees: creating personnel files, determining whether they are qualified to continuously perform the duties, providing private health insurance, creating health files, taking occupational safety measures
- Fulfilling legal obligations
- Ensuring the Security of Data Controller Operations

The above special sensitive personal data are processed within My Nova Dental and Medical Services Center for the purposes outlined. These personal data are collected from the relevant individuals in compliance with the purpose and necessity of data collection. All personal data related to activities within processes are documented in the "Personal Data Processing Inventory" of My Nova Dental and Medical Services Center, with individuals being listed according to data categories in the VERBIS registration. The personal data processed include:

- **Health Data:** Data related to a person's health condition (e.g., health report, medication details, hearing and vision information, consultation report, examination

details).

- **Biometric Data:** Data related to an individual's palm print, fingerprint, retina scan, facial recognition (e.g., fingerprint, facial recognition).

STORAGE OF SPECIAL SENSITIVE PERSONAL DATA

My Nova Dental and Medical Services Center retains personal data in accordance with the durations specified in relevant laws and regulations.

If there is no specified duration for the storage of personal data in the legislation, the personal data will be stored for the period required in accordance with the activities performed by My Nova Dental and Medical Services Center when processing the data, in compliance with the center's practices and industry standards. Afterwards, personal data related to the relevant individual will be deleted, destroyed, or anonymized in line with the "Personal Data Retention and Destruction Policy" created by My Nova Dental and Medical Services Center.

PROCESS

STORAGE PERIODS:

- **Personnel Health Files:** Stored for 10 years after the termination of the employment contract.
- **Biometric Data for Entry/Exit Tracking:** Will be destroyed after the first periodic destruction following the termination of the employment contract.
- **Patient Health Files:** Stored for 20 years after the activity ends.
- **Laboratory Process Files:** Stored for 20 years after the activity ends.

TRANSFER OF SPECIAL SENSITIVE PERSONAL DATA

Within My Nova Dental and Medical Services Center, special sensitive personal data is shared only with authorized individuals, institutions, and organizations related to the subject matter. Sharing of special sensitive personal data, outside the situations provided by law, is subject to the explicit consent of the relevant person. As a rule, special sensitive personal data is not shared internationally. These data may only be shared with authorized public institutions, legal entities, insurance companies, or other relevant institutions and organizations as per the provisions of the legislation.

ACCESS TO SPECIAL SENSITIVE PERSONAL DATA

Special sensitive personal data, other than health information, is processed under the provisions of Article 6 of the Law, in cases prescribed by law, or with the explicit consent of the data subject. Access to personal data, except for health data, is restricted to relevant departments within My Nova Dental and Medical Services Center, based on the employee's authorization matrix. Special sensitive personal data of employees is processed and stored solely by responsible persons in the Human Resources department.

Health data is only collected by occupational health and safety units under the confidentiality obligation for the protection of public health, preventive health care, medical diagnosis, treatment, and care services, and health service management, and is only accessible to authorized personnel.

PROTECTION OF SPECIAL SENSITIVE PERSONAL DATA

In accordance with Article 6, paragraph 4 of the Personal Data Protection Law, "Additional sufficient measures specified by the Board must be taken in the processing of special sensitive personal data." My Nova Dental and Medical Services Center has implemented the following technical and administrative measures to ensure the protection of special sensitive personal data and to prevent unlawful processing:

1. A systematic, well-defined, manageable, and sustainable separate policy and procedure for the security of special sensitive personal data have been established.
2. Employees involved in the processing of special sensitive personal data undergo regular training on data security in accordance with the law and related regulations.
3. Access to data is strictly controlled through user authorization, and regular checks of authorization are conducted.
4. The environments where special sensitive personal data are processed or stored electronically are secured with encryption methods.
5. If data is transferred via email or physical media, encryption and secure transmission methods are used.

RIGHTS OF THE DATA SUBJECT

The data subject may exercise their rights under Article 11 of the Law by following the procedures outlined in the "My Nova Dental and Medical Services Center Personal Data Application and Response Procedure" and the "My Nova Dental and Medical Services Center Personal Data Protection and Processing Policy."

