

TEKSERVİS TEKNİK VE TIBBİ ÜRÜNLERİ PAZARLAMA SAN. VE TİC. LTD. ŞTİ.

(Data Controller)

PRIVACY NOTICE ON THE PROTECTION AND PROCESSING OF SENSITIVE PERSONAL DATA

1. SCOPE

Article 6 of the Personal Data Protection Law No. 6698 (“LAW”) defines certain personal data that, when processed unlawfully, may cause harm or discrimination to individuals as “SPECIAL CATEGORIES OF PERSONAL DATA.”

Special categories of personal data include information about an individual's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life, criminal convictions, and imposed security measures, as well as biometric and genetic data.

2. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

TEKSERVİS TEKNİK VE TIBBİ ÜRÜNLERİ PAZARLAMA SAN. VE TİC. LTD. ŞTİ. (Data Controller) exercises special care in the processing of Special Categories of Personal Data, which are believed to be of critical importance to the Data Subject from various perspectives.

Subject to the implementation of sufficient measures determined by the Board, Special Categories of Personal Data are processed in compliance with the Law:

- by the Data Controller if the Data Subject has given explicit consent; or
- If the Data Subject has not given their explicit consent, special categories of personal data other than that relating to the Data Subject's health and sexual life may be processed, in the cases specified by law, by persons or authorized institutions and agencies subject to confidentiality obligations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

3. MEASURES FOR THE PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Pursuant to the Board's Decision No. 2018/10 dated January 31, 2018, the Data Controller takes the following measures regarding the processing of Special Categories Personal Data, as specified in Article 6 of the Law:

- A systematic, clearly defined, manageable, and sustainable policy has been formulated for the security of special categories of personal data.
- For the group(s) of employees involved in the processing of special categories of personal data:
 - disciplinary measures related to data security are in place for employees;

- confidentiality agreements are concluded;
 - disciplinary regulations containing data security provisions for employees are in place;
 - training and awareness-raising activities on data security are conducted at regular intervals for employees;
 - an authorization matrix is in place for employees;
 - corporate policies on access, information security, use, storage, and destruction have been formulated and implemented;
 - the authorizations of employees who have switched to other positions or left the company are revoked;
 - signed contracts include data security provisions;
 - extra security measures are taken for personal data transferred on paper, and the relevant documents are sent in a confidential document format.
 - personal data security policies and procedures have been formulated;
 - personal data security issues are reported quickly;
 - personal data security is monitored;
 - the necessary security measures are taken regarding access to physical environments containing personal data;
 - the security of physical environments containing personal data is ensured against external risks (fire, flood, etc.);
 - the security of environments containing personal data is ensured;
 - personal data is minimized as much as possible;
 - periodic and/or random internal audits are conducted and commissioned;
 - current risks and threats have been identified;
 - protocols and procedures for the security of special categories of personal data have been determined and are being implemented;
 - data processing service providers are audited at regular intervals regarding data security;
 - data processing service providers are made aware of data security issues;
- For physical and electronic environments where Special Categories of Personal Data are processed, stored and/or accessed, the following are used:
 - locked archive cabinet
 - company server
- If Special Categories of Personal Data are to be transferred, the following means of transfer are used:
 - hard copy
 - hard disk
- In addition to the measures mentioned above, technical and administrative measures to ensure the appropriate level of security specified in the Personal Data Security Guide published on the website of the Personal Data Protection Authority should also be taken into consideration.

4. TRANSFER OF SPECIAL CATEGORIES OF PERSONAL DATA

The Data Controller may transfer the Special Categories of Personal Data obtained in accordance with the law to third parties in line with the purposes of data processing, after taking the necessary security measures. In this regard, the Data Controller may transfer Special Categories of Personal Data to third parties if one of the conditions specified in the section above and the conditions specified below are met.

- If the Data Subject has given their explicit consent;
- If there is an explicit provision in the law regarding the transfer of Special Categories of Personal Data;
- If it is necessary to protect the life or physical integrity of the Data Subject or another person, and the Data Subject is unable to express their consent due to actual impossibility or their consent is not legally valid;
- If the transfer of personal data belonging to the parties to a contract is necessary for the establishment or performance of the contract;
- If the Data Controller is legally obligated to transfer personal data;
- If Special Categories of Personal Data have been made public by the Data Subject;
- If the transfer of Special Categories of Personal Data is necessary for the establishment, exercise or protection of a right;
- If the transfer of personal data is necessary for the legitimate interests of the Data Controller, provided that it does not harm the fundamental rights and freedoms of the Data Subject.

5. TRANSFER OF SPECIAL CATEGORIES OF PERSONAL DATA ABROAD

The Data Controller may transfer the Data Subject's Special Categories of Personal Data to foreign countries where another data controller has sufficient protection or undertakes to provide sufficient protection, in accordance with legitimate and lawful purposes of processing Personal Data, by exercising due care, taking the necessary security measures, and implementing the adequate safeguards prescribed by the Board, in the following circumstances:

- If the Data Subject has given explicit consent; or
- In case the Data Subject has not given explicit consent:
 - Special categories of personal data other than the data subject's health and sexual life (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, attire and clothing, membership in associations, foundations or trade unions, criminal convictions and imposed security measures, as well as biometric and genetic data), in cases provided for by law;
 - Special categories of personal data relating to the health and sexual life of the Data Subject may only be processed by persons or authorized institutions and agencies subject to confidentiality obligations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

This policy is implemented by the Data Controller.

Kind regards,

TEKSERVİS TEKNİK VE TIBBİ ÜRÜNLERİ PAZARLAMA SAN. VE TİC. LTD. ŞTİ.