

## GENERAL CLARIFICATION TEXT ON PERSONAL DATA PROTECTION

**ANTLINK TURIZM VE TICARET A.S.** (hereinafter referred to as ‘the company’) according to paragraph 3 of Personal Data Protection Law, declares that all personal information of ‘Data Subjects’, including the patients, next of kin (companions, parents, family members, guardians), potential patients, our guests and clients, their next of kin, in case of death – the next of kin and other family members of the deceased, visitors of our website, our subcontractors, their workers and providers and other third persons, is processed and kept by our company within the framework of the laws and regulations under the uttermost attention. Hereby this clarification text was arranged to provide the clarifying obligation of our company’s responsibilities referring to Personal Data Protection Law Number 6698 (hereinafter referred to as ‘the law’).

### **Personal Data**

General personal data and also personal data of special nature, also including but not only consisting of the necessary health-related information, gathered with the aim of diagnosing, providing the medical examination, treatment or care arrangements, are listed as follows below:

**Personal Identifying Information:** Name, Surname, Turkish Republic Identity Number, for foreigners passport number or the temporal Turkish Republic Identity Number, date and place of birth, marital status, gender and other identifying information, also, if requested, the copy of photo of ID card of the Turkish Republic or the driving licence, in cases of death, the name, surname, Turkish Republic Identity Number, date and place of birth, names of parents, gender, for foreigners passport number or the temporal Turkish Republic Identity Number.

**Contact Information:** Address, telephone number, email address

**Financial Information:** Bank account details, IBAN number

**Health Information:** Laboratory results, medical graphics and images, test results, examination information, prescription details and other information, such as details about your health and sexual life, necessary for providing for diagnosing, providing the medical examination, treatment or care arrangements; in case of death, place and date of death of the deceased, details of doctor who issued the death certificate etc.

**Information about Juridical Actions:** Data from your correspondence with the juridical institutions and all necessary details from the court files.

**Biometrical Information:** Palm scan details, necessary for Social Security Institution.

**Patient’s Insurance Information:** Details of your private health insurance and social security institution services, for planning of your financial support of your health services, also your replies and comments for evaluation of the services.

**Video and Audio Records:** Video and audio records from our CCTV, recorded during your visits to our offices, photos and video records from the burial ceremonies.

**Contact Records:** Audio records from the office landlines' recording system, done at the moments when you call our office phone numbers.

Information received during your usage of mobile or other devices while visiting our website, your IP address, browser details; all types of medical documentation, forms, questionnaires and geodata.

## **Purpose Of Processing Of Personal Data**

Your personal data is processed for the following purposes:

Providing possibility for you to purchase the products and services of our company, to make use of those products and services;

Confirming your identity;

Protection of public health, medical diagnosing, treatment and care services, planning and management of health services and financing them;

Fulfilling our legal obligations stated in the Health Services Fundamental Law Number 3359, the Decree Law Number 663 on the Organization and Duties of the Ministry of Health and its Affiliated Institutions, the Regulation of Private Hospitals, the Regulation of Processing and Ensuring the Privacy of Personal Health Data Number 6698 and other related regulations;

Planning and management of our company's daily procedures, bringing together patients and doctors, arranging hospital procedures and burial or repatriation procedures;

Measuring, improving and investigation by the company management the level of satisfaction of patients and patients' right;

Measuring, improving and investigation by the company management the level of satisfaction of family members of the deceased for cases of burials and funeral repatriations;

Medicine or medical device supply for the patients;

Providing to the patients information about the booked appointments if they're made, supplying necessary details and/or reminding about the appointments.

Carrying out risk management and quality improvement activities

Analysing the health services and burial / repatriation services you use for the purpose of improving them;

In regards to the financing of providing the necessary services, meeting the expenses of provided services checking accuracy and sharing of the required information with private insurance companies via our Customer Services, Accounts or Marketing departments;

Analysing the quality of services providers for health services or burial/repatriation services for development and improvement of those services; storing your health data, responding to all your questions and complaints within our services;

Conducting the process of managing the relations between patients and health service providers.

Taking necessary actions and transactions in official institutions for conducting of funeral services, requested by you from us;

Issuing invoices and providing financial and accounting procedures;

Following up of claims and requests;

Ensuring physical protection of the facility;

Carrying out logistic activity;

Arranging of various organizations, events or similar activities;

Performing the process of agreement

Transferring information to the authorized persons and foundations;

Composing of visitors' recording and tracking it,

Besides the purposes as written above, your personal data, with the condition of obtaining your explicit consent, could be processed with the target to providing information on improving services of health service providers, updating about the new methods of treatment application, services to be provided, openings and similar areas.

For processions of personal data of special nature, which is considered by data subjects to be more important for protection due to various reasons, our company shows special sensitivity. Within this scope, the data of that type could be processed only after receiving the explicit consent of data subject and after applying the necessary measures for data protection.

Personal data, except for data concerning health and sexual life, may be processed without seeking explicit consent of the data subject, in cases provided for by laws. Nonetheless, personal data concerning health and sexual life may only be processed, without seeking explicit consent of the data subject, on condition of applying the necessary measures, by the persons subject to secrecy obligation or competent public institutions and organizations with the reasons as shown below:

for the purposes of protection of public health,

operation of preventive medicine,

medical diagnosis,

treatment and nursing services,

planning and management of health-care services as well as their financing.

### **To Whom And For Which Purposes Processed Personal Data Could be Transferred**

In accordance with paragraphs 8 and 9 of Law number 6698, after providing of adequate protection measures your personal data, could be transferred to company shareholders, company partners, next of kin of the patient or deceased, legal persons such as private companies or governmental institutions related to the patient, private insurance companies,

laboratories, family members for the purposes limited with the services provided by us and our business cooperation or as predicted in regulations.

### **Gathering Methods of Personal Data And Legal Reasons**

Personal data may be processed without seeking the explicit consent of the data subject only in cases where one of the following conditions is met: it is expressly provided for by the laws; processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; it is necessary for compliance with a legal obligation to which the company is subject; data processing is necessary for the establishment, exercise or protection of any right; processing of data is necessary for the legitimate interests pursued by the company, provided that this processing shall not violate the fundamental rights and freedoms of the data subject; personal data have been made public by the data subject him/herself.

Our company store and processes the personal data, which was gathered by one of the following channels: by the records done when the data subject contacted us via internet or telephone; any forms or questionnaires filled in the printed form, various invoices, consignment notes, documents, agreements and similar issued in the name of our company or sent to us, medical tests, examination records or measures or other reports and documents received after your communication with the doctors and other hospital personnel at various hospitals or health centres with the purpose of receiving the health services, necessary documents and information you shared with us for providing and conducting the burial or repatriation services, CCTV records and other data.

In accordance with clause 2 of paragraph 5 despite above-written conditions, when the data procession is necessary for carrying out the agreement, legal obligations or protection of fundamental rights and freedoms, at other cases your personal data will be processed with your explicit consent.

### **Rights of Data Subject**

Rights of Data Subjects, listed in paragraph 11 of Law are as follows: each person has the right to request to the data controller about him/her to learn whether his/her personal data are processed or not, to demand for information as to if his/her personal data have been processed, to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose, to know the third parties to whom his personal data are transferred inside the country or abroad, to request the rectification of the incomplete or inaccurate data, if any.

Referring to your rights as written above, you can fill in the 'Information Request Form on Law Number 6698' on our website <https://antlink.com.tr/> and, after filling the form, you can:

print it, sign and bring it to our office or send via notary or registered mail by the postal service to our postal address.

by using the officially-registered electronic address with your secured electronic signature or mobile signature you can send it to our email address.

Postal Address:

Altındag Mah. 100. Yıl Bulvari. No:12/202, Muratpasa, Antalya / TURKEY

Officially-registered email address: [antlink@hs01.kep.tr](mailto:antlink@hs01.kep.tr)