

## **CLARIFICATION TEXT FOR THE PERSON REQUESTING HEALTH AND OTHER SERVICES**

As Dr. Firdevs Sevil Özkan, attach great importance to the security of your personal data. We would like to inform you about your rights and obligations of Dr. Firdevs Sevil Özkan within the framework of the Protection of Personal Data No. 6698.

Dr. Firdevs Sevil Özkan, as the data controller, will be able to perform all kinds of operations performed on the data such as processing, saving, storing, classifying, updating or preventing the use of your personal data in accordance with the law and honesty within the scope described below. In addition, at your request or as permitted by the relevant legislation, limited to the purpose for which they are processed, it may be transferred to third parties, organizations and the data storage systems they use (inland-internal).

### **1. Processing of Your Personal Data and Data Controller**

Dr. Firdevs Sevil Özkan, as a data controller, in order to provide you health services;

- Your identity information (Name Surname, TR Identity Number, gender, place and date of birth)
- Contact information (address, phone number, e-mail address (mail), SMS)
- Your bank account / Iban number, financial information regarding payment and billing
- Your private health insurance or Social Security Agency data
- Health data, including but not limited to external laboratory and imaging results, test results, inspection data, scan record, prescription information, for the purpose of being in your file.
- Your closed-circuit camera system recordings in the general areas of the clinic.
- WhatsApp-Facebook-Twitter-Instagram-Skype-Linkedin-Signal-Telegram-Snapchat-Beep phone apps and Gmail, Yahoo, Hotmail systems, such as email you are sending the credentials, contact information, photographs, video recordings, audio recordings, students with your comments and feedback messages
- We declare that we will save your personal information, including your medical data, that you transmit with your consent via telephone, telephone applications or e-mail, and in any case, we will process it in our archives as stipulated in the Personal Data Law and subject to conditions.

### **2. Purposes of Processing Personal Data and Legal Basis**

Your personal Identity, Communication, Health, Finance and Physical Space Security Data obtained by Dr. Firdevs Sevil Özkan through written, oral or digital media belonging to you during the registration process and during and after the continuation of the health service provided can be processed for the following purposes and legal grounds.

- In accordance with the Health Services Basic Law, Social Insurance and General Health Insurance Law, Medical Laboratory Regulation, Regulation on Personal Health Data and other relevant legislation, Bringing Dr. Firdevs Sevil Özkan's activities into compliance with the legislation by fulfilling her legal obligations,
- Execution of emergency management processes,
- In order to carry out the sales processes of goods/services; Carrying out preventive medicine, medicine, diagnosis, treatment and follow-up services; Performing necessary medical services, tests and examinations by Dr. Firdevs Sevil Özkan's employees; performing billing operations, taking a Scan record for cell tracking in the field of Complementary Medicine,
- Execution of risk management activities,
- In order to provide information to authorized persons, institutions and organizations; Sharing requested information with private insurance companies and institutions within the scope of financing health services, sharing requested information and documents with the Ministry of Health and other regulatory and supervisory institutions in accordance with the relevant legislation, confirming of your relationship with health institutions and doctors other than Dr. Firdevs Sevil Özkan, transfer and/or receipt of the necessary health data regarding the health services to be provided to you by the relevant institution or doctors, contacting for information about our services, applications, innovations, making appointments and ensuring the follow-up and regularity of appointments;
- Execution of information security processes,
- For the purpose of carrying out customer relationship management processes, Performing the Health Service Requester registration and transactions, tracking of appointment transactions, making related reminders;
- Ensuring the physical space and occupational safety of the clinic;
- Execution of financial and accounting transactions
- Conducting activities for customer satisfaction
- Legal reasons for the processing of your personal data; Private Hospitals Law No. 2219, cases clearly stipulated in the Health Services Basic Law No. 3359, decree Law No. 663 on the Organization and Duties of the Ministry of Health and its Affiliates, convention on Human Rights and Biomedicine, Convention No. 108 on the Protection of Individuals Against Automatic Processing of Personal Data, Regulation on Processing Personal Health Data and Ensuring Privacy, Health Implementation Communiqué, Fulfilling our legal obligations arising from the relevant secondary legislation such as the Patient Rights Regulation and protecting public health, preventive medicine, execution of medical diagnosis, treatment and care services, planning and management of health care and its financing, In addition, personal data is processed within the scope of related legislation such as the Turkish Commercial Code, Tax Code, Tax Procedure Law, Draft Communiqué on the Management of Information Systems Used in Bank and Credit Card Transactions, as well as the requirement to issue invoices due to the provision of products and services.

### 3. Transferring of Your Personal Data

Personal data, including sensitive personal data belonging to you who request health services, received at the time of registration of the person requesting Health and other services and during the period of service of Dr. Firdevs Sevil Özkan can be shared with the following buyer groups in accordance with the KVKK(The law on the protection of personal data) No. 6698 in order to fulfill the legal obligations of Dr. Firdevs Sevil Özkan, to maintain the financial processes or to provide technical support, if it is clearly stipulated in the relevant laws, if it is mandatory for the establishment or performance of the contract, and if explicit consent is obtained.

Republic of Turkey Ministry of Health and Provincial Health Directorates, In case of request by the competent authorities, especially but not limited to the Public Health Centers and the units affiliated to the Ministry of Health, in case of request by persons appointed by the competent authorities or within the scope of established e-pulse and similar systems or with the relevant authorities and persons of your personal data in accordance with our notification and/or reporting obligation uploaded to us;

- With the legal representatives and third parties we are working with, including the lawyers, consultants, financial advisors, occupational safety and health companies, auditors, whom we receive consultancy from and whom we authorize,
- With the security firm, computer support firm, web design firm that we receive service from to carry out our activities,
- With the Social Security Institution for patients subject to the social security institution, With your insurance company of which you are a member, in case you use your private insurance, with your institution if your billing will be made to your institution,
- In case of need , with other specialist doctors or health institutions, for the evaluation of clinical examinations, diagnosis and treatment,
- With the legal representatives you have authorized,

\*Other than those listed above, your laboratory and imaging results, interventional and non-interventional tests, diagnosis and follow-up data, Scan record test results and examination results can be transferred to third parties upon your written or verbal request, provided that the special number given by Özkan or the identification of the third party is presented.

Provisions in other laws regarding the transfer of personal data abroad are reserved.

Since the e-mail system is based abroad, your personal data collected via e-mail can be transferred abroad for the legitimate interest of the data controller and for the purpose of conducting business activities, in accordance with the legislation, to the extent necessary by taking all kinds of security measures. The legislation regarding the processing of personal data of the relevant country exists and is implemented. In addition, there is an independent data authority in the relevant country and the relevant country is a party to international agreements on the protection of personal data and is a member of international organizations.

#### **4. Method of Personal Data Collection**

Your personal data is collected verbally, visually, in writing or electronically from social media, internet, physical places and similar channels, depending on the nature of the service provided, within the scope of the above-mentioned purposes.

#### **5. Security Measures Taken Regarding Your Personal Data**

Our Health Institution, which, as a data controller, performs data processing activities such as obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of your personal data;

- a) To prevent the unlawful processing of your personal data,
- b) To prevent unlawful access to personal data,
- c) It is responsible for taking all kinds of technical and administrative measures to ensure the appropriate level of security in order to ensure the protection of personal data and takes these measures to the maximum extent. In addition, additional security measures, which are determined by the Personal Data Protection Board and are not limited to the following, are also taken in the processing of sensitive personal data.

Our employees are trained on information security, patient privacy, and protection of personal data. Personal data is destroyed when the purpose of use is no longer present. Our systems containing personal data are routinely audited. Data controller-data processor contracts are made. Up-to-date software is used. Access to systems containing personal data is limited. Antivirus and anti spam programs are used. Information networks related to security problems are constantly monitored. In case of abuse of the systems, evidence is collected and reported to the Personal Data Protection Authority and a criminal complaint is made to the Prosecutor's Office. Protection measures have been taken in the physical environments where personal data are located, and these environments are kept locked and the entrances and exits are under control. More detailed information can be found at <http://www.sebenklinik.com/> via the Personal Data Protection Policy.

#### **6. Policy on Deletion, Destruction or Anonymization of Your Personal Data**

Protection of personal data is among the most important priorities of Dr. Firdevs Sevil Özkan, and she makes maximum efforts to behave accordingly with all in force legislation in this regard. Dr. Firdevs Sevil Özkan preserves personal data for the period required for the purpose for which they are processed and for the minimum period in the legal legislation to which the relevant activity is subject. In this context, the clinic first determines whether a period is specified for the storage of personal data in the relevant legislation, and if a period is specified, it acts accordingly. If there is no legal period, personal data are stored for the period necessary for the purpose for which they are processed. The said periods are for the purposes and legal reasons listed in Article 2 of this clarification text; therefore, your personal data is processed for 10 years in accordance with the legal statute of limitations, starting from the person's arrival at the Clinic and receiving health care and other services,

and your personal data collected via the security camera in the clinic are processed for 30 days as of the end of your visit to the clinic. At the end of the specified storage periods, in accordance with the periodic destruction periods or the application of the data owner, the data stored in paper media is destroyed in the paper shredder, the data stored on the optical media is deleted from the system, anonymized and made inaccessible again.

The clinic takes the necessary administrative and technical measures to finalize the applications to be made by the personal data owner in accordance with the Law and secondary legislation.

## **7. Rights of Personal Data Owner Enumerated in Article 11 of KVKK(The law on the protection of personal data)**

The rights you have as the person whose personal data are processed in accordance with Article 11 of the KVKK;

1. Learning whether your personal data is processed
2. If your personal data has been processed, requesting information about it.
3. Learning the purpose of processing your personal data and whether they are used in accordance with the purpose.
4. Knowing the third parties to whom your personal data is transferred in the country or abroad.
5. Requesting correction of your personal data if it is incomplete or incorrectly processed.
6. Requesting the deletion or destruction of your personal data within the framework of the conditions stipulated in the KVVK.
7. Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing have disappeared, although it has been processed in accordance with the provisions of the Law no.
8. Objecting to the emergence of a result against you by analyzing your processed data, exclusively through automated systems.
9. Requesting compensation for your damage in case you suffer damage due to unlawful processing of your personal data.

In order to exercise your above-mentioned rights in accordance with paragraph 1 of Article 13 of the Law, you can make your application by certified mail to 'Gordion AVM arkası 2558. Sokak Azat Bey Sitesi No 22/A Çayyolu / Ankara' by attaching documents proving your identity, in accordance with Article 5 of the Communiqué on Application Procedures and Principles to Data Controller, published by the Personal Data Protection Authority You can do it through a notary public or you can do it directly in writing by attaching documents proving your identity.

In accordance with Article 5/2 of the Communiqué on the Procedures and Principles of Application to the Data Controller, the obligatory matters that must be included in the application in order for the applications made to Özkan to be answered in accordance with the law and legislation are listed below:

1. Name, surname and signature if the application is written
2. For citizens of the Republic of Turkey, T.R. identification number, for foreigners, nationality, passport number or identification number, if any,
3. Domicile or workplace address for notification
4. If available, the e-mail address, telephone and fax number for notification
5. Subject of the request

In line with the forwarded request, your relationship with Özkan will be determined, your personal data processed by Özkan, if any, will be determined completely, and your relevant application will be answered correctly and free of charge within 30 (thirty) days at the latest. If the transaction requires a cost, the fee in the tariff determined by the Personal Data Protection Board will be requested by Dr. Firdevs Sevil Özkan from the person concerned.

In order to avoid legal risks that may arise from illegal and unfair data sharing, to ensure the security of your personal data and to verify that the applicant is the relevant person, Dr. Firdevs Sevil Özkan reserves the right to request your personal information, additional documents or information (copy of identity card or driver's license, etc.) In the event that the information regarding your submitted requests is not correct, not up-to-date or an unauthorized application is made, Özkan does not accept any liability for such false information or requests arising from unauthorized applications.

#### **8. Request to Update Information**

The personal data we collect must be correct and up-to-date when necessary. Therefore, if there is any change in your personal data, you can notify Dr. Firdevs Sevil Özkan about this. Your request is processed within 20 days from the receipt of your request to the data controller. In case of any change in the text content, the effective date and content of this Text will be updated. You can also access the Person Requesting Health Care and Other Services Clarification Text at <http://www.sebenklinik.com/> and send your requests and questions.

#### **Information about computer program and system**

- Persons working in Dr. Firdevs Sevil Özkan Private Practice have been granted access to computer programs and written documents to the extent necessary for their work and responsibilities.
- Necessary measures have been taken to ensure that the main server computer where personal data is stored is not damaged or stolen.

#### **Additional Informations**

- When people state that they do not want messages, reminders or notifications, the relevant posts are stopped.

- Our employees sign declaration, acceptance and commitment letters that they are aware of their rights, responsibilities and obligations within the framework of the personal data protection law. These articles are added to the contracts.
- Our staff were informed about the in-clinic imaging system, the locations of closed circuit cameras and the absence of sound recordings. No record is made without their information.
- Information and documents and related notes from third parties regarding patients are kept in the patient files as long as the patient records are kept in the computer program, with the consent of the patients.
- Only authorized employees can follow these records

Name-Surname:

Date: