

Personal Data Protection and Privacy Policy

Scope

This Policy, named Personal Data Protection and Privacy Policy, has been prepared in order to provide the necessary information by explaining the whole set of rules for the processing of personal data. Estetikland Esthetics and Beauty Center from now on, will be referred to as "Estetikland".

Definitions

Personal data: It is any kind of information related to a specific or identifiable natural person.

Sensitive personal data: Race, ethnic origin, political opinion, philosophical belief, religion and sect, or other beliefs, costume and clothing, association or trade union membership, health, sexual life, criminal convictions, security measures, biometric and genetic data of the persons.

Explicit consent: Consent regarding a specific matter, based on being informed and expressed by free will.

Anonymization: The process of making personal data unrelatable to a natural person whose identity is determined or can be determined, in any way even by linking with other data.

Processing personal data: All kinds of transactions done on the data such as the acquisition of personal data in completely or partially automated or non-automated on the condition of being a part of a data registration system, it being recorded, stored, preserved, changed, reorganised, explained, transfer, taken over, made acquirable, categorized or preventing the use of personal data. Starting from the first moment of obtaining, all transactions performed on the data is considered to be in this scope.

Personal data owner: The natural person whose personal data is processed

Data recording system: The registration system in which personal data is processed by configuring it according to certain criteria

Data controller Natural or legal person who determined the processing purpose and methods of personal data and who is responsible for data registration system being set up and managed

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Processor: Natural or legal person who processes personal data for the data controller by the authorization vested in him
Contact person: The person responsible for the operation of the procedures and who will provide communication with the Board

Personal Data Protection Law: Personal Data Protection Law dated March 24, 2016 and numbered 6698, published in the Official Gazette dated April 7, 2016 and numbered 29677

Contact Person

Board: Personal Data Protection Board

Policy: Estetikland Personal Data Protection and Privacy Policy

Personal Health Data Refers to the information about all kinds of information regarding the natural person's, whose identity is determined or can be determined, physical and mental health and information regarding the health services provided to this person.

Deletion of Personal Data The process of deletion of personal data, making it inaccessible and unusable by any means to the relevant users.

Destruction of Personal Data The process of destruction of personal data, making it inaccessible, unrecoverable and unusable by anyone.

Periodic Extermination Process The process of deletion, destruction or anonymization specified in the personal data storage and extermination policy and to be carried out ex-officio regularly, in the event of all the personal data processing conditions listed in the Law being removed.

References

Personal Data Protection Law ("KVKK") and the related legislation: Refers to the Law dated March 24, 2016 and numbered 6698, published in the Official Gazette dated April 7, 2016 and numbered 29677 and the relevant legislation

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Changes

With the relevant legislation entering into force, our policy on changes that will be made to this policy from time to time will be updated along with the revision number. The Amendments shall enter into force on the date of publication of the Policy containing the amendments.

Purpose

Estetikland, who has been serving their patients in the health and aesthetics sectors since the year 2007, legally processes the personal data of its patient's, employee's, supplier's, visitor's, job applicants' or natural person's, who may have an established relationship with Estetikland through a purpose or a channel, in the capacity of Data Controller within the scope of the Personal Data Protection Law .

The purpose of this policy is to inform the relevant persons by making a statement about the data processing activities carried out by Estetikland and thus to provide transparency about the protection of personal data.

In this context, Estetikland has included the processing of personal data within the scope of Personal Data Protection Law, the data owners and the rights of these persons, the use of cookies and similar technologies and other related issues in this Policy.

Personal data:

General Principles of Personal Data Processing

Within the framework of the purposes given as examples in the "**Purposes of Processing Personal Data**" section of hereby Policy, Estetikland processes data in compliance with the principles below:

- Compliance with the law and the rules of honesty
- Being accurate and up-to-date when necessary
- Processing for specific, explicit and legitimate purposes
- Being limited to, in moderation and in connection with the purpose for which they were processed
- Preservation for as long as required by the relevant legislation or for the purpose for which they were processed

Data Processed by Estetikland

Personal data is processed by putting emphasis on the data security and the right to privacy pursuant to the 5th and 6th articles of the Personal Data Protection Law for the activities that can be carried out without explicit consent and by people who are under confidentiality obligation within the scope of the 6/3th article of the Law for the purposes of medical diagnosis, treatment, carrying out care services, planning and management of health and aesthetics services, outside of purposes other than these, it is processed with explicit content.

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The personal data processed in accordance with the principles in this Policy and differentiated depending on the type and nature of the relationship between Estetikland and the data owner, the communication channels used and the purpose information mentioned are as follows:

- Information that identifies the data owner such as name, surname, TR ID No, age, profession, title, work information, educational status, sex, criminal record information, career, IBAN
- Data such as date of birth, place of birth, identification number, blood type, individual registration no, volume no, family serial no, religion and photo found in identification documents such as a photocopy of identity card, passport and driver's license
- Along with contact information such as address, e-mail, phone and fax number, contact records within the scope of phone calls and e-mail correspondence
- Detailed financial data on collection and payment activities
- Health data such as medical treatment information, diagnostic information, blood type, health report, applied medical treatment

Purposes of Processing Personal Data

Personal data may be processed by Estetikland within the scope of the following purposes and may be stored for as long as these purposes and the relevant legal periods foresee:

- Identification of patients, employees, visitors, suppliers and other related persons
- Making an appointment for patients, appointment reminder, making changes and other information about the rendering of the service
- Evaluation of the patient and making a diagnosis and giving treatment
- Carrying out health services for the purpose of providing medicine and medical supplies with patient care
- Rendering safekeeping services with the provision of patient personal belongings management
- Creation of employee files
- Carrying out accounting and financial processes regarding payment of service charges and payment transactions
- Receiving and evaluating requests and complaints, receiving feedback on the products and services from the patients
- Follow-up and carrying out legal transactions
- Carrying out information security processes
- Conducting audit and ethics activities to be carried out by official institutions and professional organizations
- Conducting market research, promotion and informing activities related to the products and services offered by Estetikland
- Carrying out activities such as academic trainings, scientific research and publication, consulting, as well as fulfilling requests for participation in trainings, seminars and similar organizations
- Ensuring workplace safety

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Transfer Of Personal Data

Within the framework of the purposes given as examples in the "**Purposes of Processing Personal Data**" section of hereby Policy and pursuant to the 8th and 9th articles of the Personal Data Protection Law, Estetikland can transfer data domestically. Personal data can be processed and stored on the server, website and electronic media used, as well as in physical environments. The nature of these transfers and the parties with whom they are shared vary depending on the type and nature of the relationship between the data owner and Estetikland, the purpose of the transfer and the relevant legal basis, these parties are as follows:

- Doctors
- Employees
- Service providers
- Suppliers
- Legal consultants
- Public institutions and private persons authorized by law

Collection of Personal Data

For purposes given as examples in the "**Purposes of Processing Personal Data**" section of hereby Policy to be met, within the framework of the conditions foreseen in the 5th and 6th articles of the Personal Data Protection Law, Personal Data Personal data can be collected directly by Estetikland through patients and patient relatives, potential patients, employees, suppliers, business partners and official institutions and other physical media, as well as, web sites, internet sites, mobile applications, social media and other public media and trainings, organizations and similar activity arrangements.

Personal Data Storage Period

Personal data are kept within Estetikland up to the relevant legal storage periods and are stored for the period necessary for the realization of the activities related to these data and the purposes specified in this Policy. Personal data, the purpose of use of which has expired and the legal storage period has expired, is deleted, destroyed or anonymized.

Rights of the Data Owner within the scope of the Personal Data Protection Law

Data owners who have personal data within Estetikland, possess the rights specified in the 11th article of the Law below:

- Find out whether your personal data has been processed or not,
- Request information about your personal data if it has been processed,

- Find out the purpose of processing your personal data and whether they have been used for their intended purpose,
- Know about the third parties to whom your personal data has been transferred within the country or abroad,
- In the event of your personal data being processed incompetently or wrong, requesting for these to be

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corrected and in this scope, requesting for notice to be given to the third parties with whom your personal data in the shared with,

- Despite the fact of them having been processed in accordance with the Law and other relevant provisions of laws, requesting for your personal data to be deleted or destroyed due to the fact that the reasons for their processing not being valid anymore and notice to be given to the third parties the data was shared with,
- Objecting an outcome arising against you in consequence of your processed personal data being analyzed by exclusively automatic systems,
- Requesting for losses to be recovered in the event of your personal data being damaged as a result of illegal processing.

Requests from data owners for the purpose of using one of the above rights are met according to the specified response method no later than 30 days.

Security of Personal Data

Estetikland puts emphasis on protecting the privacy and security of personal data. Accordingly, takes the necessary technical and administrative security measures to protect personal data against unauthorized access, damage, loss or disclosure.

Responsibility

The Contact Person is responsible for the implementation and execution of the requirements of this policy. The contact person is obliged to ensure all communication with the Board.

Enforcement and Audit

This policy enters into force on the date of its publication, and the Contact Person is responsible for keeping the procedure up to date.

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