

PRIVACY NOTICE

As Bosphore Medikal Sağlık Turizm ve Danışmanlık Hizmetleri Anonim Şirketi ("**Bosphore Medical**" or "**Our Company**"), we ensure full compliance with both the Law on the Protection of Personal Data No. 6698 ("**KVKK**") in Turkey and the General Data Protection Regulation ("**GDPR**") of the European Union in order to maintain transparency in the processes of collecting, processing, and protecting your personal data. This Privacy Notice has been prepared to inform you during the collection of your personal data and to explain how you can exercise your rights.

1. DATA CONTROLLER

Your personal data is processed by our Company. As the data controller, we take all necessary technical and administrative measures to ensure the security and confidentiality of your personal data.

2. 2. PERSONAL DATA PROCESSED, PURPOSES OF PROCESSING, AND LEGAL GROUNDS

The personal data collected is processed for the following purposes:

Personal Data	Purposes of Processing	Legal Grounds
<ul style="list-style-type: none"> ▪ Identity Information (Name, surname, date of birth, passport number, visa information, gender, nationality) 	<ul style="list-style-type: none"> - Provision and management of our health tourism services, - Conducting reservation procedures, - Planning and implementing healthcare services and treatment processes, and - Arranging travel and accommodation. 	<ul style="list-style-type: none"> - Establishment and Performance of the Contract, - Fulfillment of Legal Obligation, - Establishment, Exercise, or Defense of a Legal Right
<ul style="list-style-type: none"> ▪ Contact Information (E-mail address, phone number, residential address) 	<ul style="list-style-type: none"> - Providing information related to our services, responding to your requests, and providing customer support, - Sending appointment reminders and updates, - Conducting surveys and feedback requests to measure customer satisfaction and improve our services. 	<ul style="list-style-type: none"> - Establishment and Performance of the Contract, - Establishment, Exercise, or Defense of a Legal Right
<ul style="list-style-type: none"> ▪ Health Information (Medical history necessary for benefiting from healthcare services and requested treatment information) 	<ul style="list-style-type: none"> - Planning of treatment and providing intermediary services for access to healthcare services. 	<ul style="list-style-type: none"> - Explicit Consent, - Establishment, Exercise, or Defense of a Legal Right
<ul style="list-style-type: none"> ▪ Payment Information (Payment method details and payment date) 	<ul style="list-style-type: none"> - Conducting payment transactions, - Performing billing and accounting processes, and - Conducting financial reporting and audits. 	<ul style="list-style-type: none"> - Establishment and Performance of the Contract, - Establishment, Exercise, or Defense of a Legal Right
<ul style="list-style-type: none"> ▪ Service Usage Information (Page visit information, IP address, browser information, and data collected through cookies) 	<ul style="list-style-type: none"> - Personalizing and improving user experience on our website, and - Improving our services by analyzing user behavior and preferences. 	<ul style="list-style-type: none"> - Explicit Consent, - Legitimate Interest of the Data Controller

3. METHODS OF COLLECTING YOUR PERSONAL DATA

Your personal data is collected through the following methods within the scope of the services provided by Bosphore Medical:

a) Reservation and Service Requests:

When you apply to our Company to benefit from the services, your identity information, contact information, and information regarding the requested healthcare service are collected through the documents provided by you.

b) Contracts and Consent Forms:

Your personal data is collected through contracts and consent forms related to the services provided to you.

c) Digital Communication:

Your personal data is collected through communication forms or reservation request forms filled out on our Company's corporate website, e-mails sent to our corporate e-mail address, and written, audio, or visual information shared via remote communication tools such as WhatsApp, Zoom, FaceTime, etc.

d) International Communication and Social Media:

Your personal data is collected through correspondences, comments, or requests made via social media platforms hosted on servers abroad, through accounts owned by our Company.

4. RETENTION PERIOD OF PERSONAL DATA

Your personal data will be retained by our Company for as long as it is legally required to do so. The retention obligations stem from local laws related to commerce, tax, and healthcare regulations. The retention periods for your personal data are listed in the table below:

Your Personal Data		Retention Periods
Identity Information	→	10 years after the termination of the service
Contact Information	→	10 years after the termination of the service
Health Information	→	2 years after the termination of the service
Payment Information	→	5 years after the termination of the service
Service Usage Information	→	5 years after the termination of the service

5. SITUATIONS REQUIRING YOUR EXPLICIT CONSENT

In accordance with GDPR Article 6/1/a and KVKK Article 5/1, your personal data can only be processed with your explicit consent in the following situations:

a) Processing of Your Health Data

In accordance with GDPR and KVKK regulations, your health data collected (i) for the purpose of planning and conducting your treatment process and (ii) when it is necessary

to share your health data with healthcare institutions as part of healthcare services, can only be processed with your explicit consent.

b) Sending SMS Messages and Emails

Sending SMS messages and/or emails and establishing mobile communication to promote, announce, and inform you about the services offered by Bosphore Medical can only be done with your explicit consent.

c) Transfer of Data Abroad

Your data will be shared through service providers whose servers are located abroad, which is considered a "transfer abroad". Therefore, your explicit consent will be requested in such cases. However, in the following cases, since no direct transfer abroad is carried out by our Company, your explicit consent will not be sought, and it will be considered that your explicit consent has been obtained by the service provider you use, as you have accepted the Privacy Agreement, Privacy Policy, and Data Transfer Principles of the relevant service provider:

i. Remote Communication Applications and Email Service Providers:

If you send written/audio messages and/or photos/video recordings to our Company, make voice/video calls, or communicate with our Company using email service providers (e.g., Hotmail, Gmail, Yahoo, etc.) via service providers whose servers are located abroad (e.g., WhatsApp, Zoom.us, FaceTime, Skype, Messenger, Google, Instagram, Facebook, etc.),

ii. Social Media Applications and Digital Advertisements:

If you send direct messages to our Company's profile on social media platforms (e.g., Instagram, YouTube, Facebook, Twitter, LinkedIn, etc.) whose servers are located abroad or apply to our Company's advertisements and promotions on these platforms.

6. AGE LIMIT UNDER REGULATIONS

Within the scope of KVKK, patients or clients who receive services from Bosphore Medical can give their own consent to the processing of their personal data, provided they are at least 18 years old. For patients or clients under this age limit, consent must be provided by their legal representatives.

Under GDPR, patients or clients who are citizens of European Union countries or reside in European Union countries can provide their own consent to the processing of their personal data, provided they are at least 16 years old or meet the age limit required by their country. For patients or clients below this age, consent must be provided by their legal representatives.

7. PARTIES TO WHOM YOUR PERSONAL DATA MAY BE TRANSFERRED

For the purpose of managing international healthcare services and treatment processes, your personal data may be shared with healthcare institutions and service providers abroad, upon your request. This sharing includes relevant hospitals, clinics, medical centers, and laboratories abroad. The transfer of data abroad is carried out with the necessary security measures in accordance with KVKK Article 9, the Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad, which was published in the Official Gazette dated July 10, 2024, and numbered 32598, and GDPR Article 44.

8. RIGHTS OF DATA SUBJECTS

Under KVKK and GDPR, as data subjects, you have the following rights:

a) Right to Request Information:

To learn whether your personal data is being processed, to request clear and transparent information about how and for what purposes it is being processed, and to know the third parties to whom personal data is transferred domestically or abroad and what personal data is transferred.

b) Right of Access:

To request access to your personal data and obtain a copy of this data.

c) Right to Request Rectification:

To request the rectification of your personal data if it is incomplete or incorrectly processed.

d) Right to Erasure or Destruction (Right to be Forgotten):

To request the erasure or destruction of your personal data if the reasons requiring its processing no longer exist.

e) Right to Restrict Processing:

To request the restriction of the processing of your personal data under certain conditions.

f) Right to Data Portability:

To request to receive your personal data in a structured, commonly used, and machine-readable format, and to request the transfer of this data to another data controller, as well as to request that third parties to whom personal data is transferred be informed of such requests.

g) Right to Object:

To object to a result arising solely from the automated processing of your personal data that produces legal effects concerning you or similarly significantly affects you.

h) Right to Compensation in Case of Damage:

To request compensation if you suffer damage due to the unlawful obtaining, processing, or storage of your personal data.

Data subjects can exercise the above rights by sending an electronically signed e-mail to our Company's registered electronic mail address "bosphoremedikal@hs01.kep.tr" or by submitting a written request to our Company's headquarters at **Osmanağa Mah. Yoğurtçu Parkı Cad. Orkide Apt. No:4 K:2 D:3 Kadıköy/İstanbul**. Your requests will be carefully evaluated and finalized as soon as possible in compliance with KVKK and GDPR regulations. You can access the Data Subject Application Form [here](#).

After receiving your application, your request will be processed as soon as possible and at the latest within thirty (30) days, and if the process does not require additional costs, it will be completed free of charge. Your applications will be carefully evaluated in accordance with KVKK and GDPR regulations, and you will receive a response in writing or electronically. In cases where the process incurs additional costs, a fee may be charged according to the tariff set by the Personal Data Protection Authority.

This Privacy Notice has been prepared to ensure transparency in the processes of collecting and processing your personal data. For more information on the subject or to exercise your rights, you can review our Privacy Policy or contact us.

9. CHANGES

Our Privacy Notice is reviewed and updated periodically in line with legal regulations, our business processes, or changes in the services we provide. Changes to our Privacy Notice will be published on our website and made available to the public to ensure that data subjects always have access to the most up-to-date information. In the case of significant changes, data subjects will be notified directly via e-mail. The updates published on our website will be effective from the date of publication.

10. CONTACT INFORMATION

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Kadıköy, İstanbul
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Phone : +90 (532) 209 89 56

We are happy to assist you with any matter related to data protection and privacy. We are here to answer your questions and fulfill your requests.