

PRIVACY POLICY

1. INTRODUCTION

As Bosphore Medikal Sağlık Turizm ve Danışmanlık Hizmetleri Anonim Şirketi ("**Bosphore Medical**" or "**Our Company**"), we place great importance on the privacy of your personal data. This Privacy Policy explains the purposes for which personal data of users visiting our website at "www.bosphoremedical.com" is collected, how it is processed, with whom it is shared, and how it is protected. Additionally, this policy provides information about the rights of data subjects and how these rights can be exercised.

Bosphore Medical carefully processes your personal data within the scope of the General Data Protection Regulation of the European Union ("**GDPR**") and the Turkish Personal Data Protection Law No. 6698 ("**KVKK**") to provide the best service to our valued users. This Privacy Policy has been prepared in compliance with both regulations and details the measures and procedures taken to ensure the privacy and security of your personal data.

This policy applies to all users visiting our website and aims to provide transparent and clear information on the protection of your personal data. By using our website, you are deemed to have accepted the terms stated in this Privacy Policy. If you have any questions or concerns, you can contact us using the contact information provided below.

2. COLLECTION OF PERSONAL DATA

a. Data Collected:

As Bosphore Medical, we collect various personal data to provide our services and offer you a better experience. The personal data we collect when you visit our website or use our services are as follows:

- **Identity Information:**
Name, surname, date of birth, passport number, visa information, gender, nationality, and other identity information.
- **Contact Information:**
E-mail address, phone number, residential address, and other contact details.
- **Health Information:**
Medical history and requested treatment information necessary for you to benefit from healthcare services.
- **Payment Information:**
Bank account details, IBAN number, credit card information, and billing information necessary for payment transactions, including the payment date.
- **Service Usage Information:**
Information on the pages you visit on our website, your IP address, browser information, and other usage data collected through cookies.
- **Other Information:**

Responses to surveys, conversations with customer service, and other information you voluntarily provide.

b. Methods of Data Collection:

Your personal data is collected through the following methods:

- **Directly Provided Information:**

This includes information you provide through communication forms or reservation request forms on our corporate website; emails sent to our corporate email address; written, audio, or visual information shared with us via remote communication tools such as WhatsApp, Zoom, FaceTime; and correspondence with our accounts on social media platforms.

- **Automatically Collected Information:**

This includes information automatically collected through cookies and similar technologies when you visit our website, as well as contracts and consent forms related to the services provided to you.

- **Information Received from Third Parties:**

This includes information legally obtained from our business partners, healthcare institutions, and other third parties.

- **Phone and Email Conversations:**

This includes information provided during phone calls and email communications with our customer service team.

The personal data in question is processed and protected in accordance with the principles of privacy and security under KVKK and GDPR. For more information on the purposes of processing the collected data and the legal grounds, please review the relevant sections of this Privacy Policy.

3. PURPOSES OF PROCESSING PERSONAL DATA

As Bosphore Medical, we process the personal data we collect for the following purposes:

a. Service Provision and Management:

- Provision and management of our health tourism services,
- Conducting reservation procedures,
- Planning and implementing healthcare services and treatment processes, and
- Arranging travel and accommodation.

b. Communication:

- Providing information about 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.

c. Fulfillment of Legal Obligations:

- Storing and reporting information required by law,
- Complying with requests from authorized public institutions and organizations,
- Providing necessary information for the conduct and documentation of legal processes.

d. Financial Transactions:

- Conducting payment transactions,
- Performing billing and accounting processes, and
- Conducting financial reporting and audits.

e. Marketing and Advertising:

- Providing information about our services, informing you about campaigns and promotions,
- Personalizing and improving user experience on our website, and
- Conducting targeted advertising and marketing activities.

f. Security and Administrative Processes:

- Ensuring the security of our website and preventing malicious activities,
- Managing administrative and operational processes, and
- Ensuring compliance with internal policies and procedures.

g. Analysis and Research:

- Analyzing the use of our services and creating statistical reports, and
- Improving our services by analyzing customer behavior and preferences.

h. Data Retention and Archiving:

- Storing and archiving data in accordance with legal requirements and company policies.

4. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

As Bosphore Medical, we process your personal data in accordance with the legal grounds specified under both KVKK and GDPR. The legal grounds for our data processing activities are listed below:

a. Explicit Consent (KVKK Article 5/1, GDPR Article 6/1-a):

- Consent given freely, with specific information, and based on the data subject's free will for a specific purpose.

b. Explicit Provision in Laws (KVKK Article 5/2-a, GDPR Article 6/1-b):

- When the processing of personal data is explicitly provided for by the law.

c. Establishment and Performance of a Contract (KVKK Article 5/2-c):

- When the processing of personal data is necessary for the establishment or performance of a contract to which the data subject is a party.

d. Fulfillment of Legal Obligations (KVKK Article 5/2-ç, GDPR Article 6/1-c):

- When the processing is necessary for the data controller's/processor's fulfillment of their legal obligations.

e. Protection of Vital Interests (GDPR Article 6/1-d):

- When the processing is necessary to protect the vital interests of the data subject or another natural person.

f. Data Made Public by the Data Subject (KVKK Article 5/2-d):

- When the personal data has been made public by the data subject themselves.

g. Establishment, Exercise, or Defense of a Legal Right (KVKK Article 5/2-e):

- When the processing is necessary for the establishment, exercise, or defense of a legal right.

h. Performance of Public Duties (GDPR Article 6/1-e):

- When the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

i. Legitimate Interests (KVKK Article 5/2-f, GDPR Article 6/1-f):

- When the processing is necessary for the purposes of legitimate interests pursued by the data controller/processor, provided that such interests do not harm fundamental rights and freedoms.

5. TRANSFER OF PERSONAL DATA

As Bosphore Medical, we share your personal data with third parties only when necessary and for the purposes stated below. The transfer of your personal data is carried out in compliance with our obligations under KVKK and GDPR.

a. Parties to Whom Personal Data is Transferred:

i. Authorized Public Institutions and Organizations

Your personal data may be shared with authorized public institutions and organizations to fulfill our legal obligations, ensure compliance with regulations, respond to official requests, and manage legal proceedings. This includes the Ministry of Health, the General Directorate of Security, and other relevant public authorities.

ii. Healthcare Institutions and Healthcare Providers

Your personal data may be shared with healthcare institutions and healthcare providers for the provision of healthcare services and the management of treatment processes. This includes hospitals, clinics, medical centers, and laboratories with which we have agreements.

iii. Business Partners

Personal data may be shared with our business partners for the provision and management of services, logistical and operational support. This includes transportation and accommodation service providers, insurance companies, and payment processors.

iv. Professional Advisors and Service Providers

Your personal data may be shared with professional advisors and service providers (law firms, financial consultants, and audit firms) for the provision of legal, financial, and other professional services.

v. Marketing and Analysis Service Providers

Your personal data may be shared with marketing agencies and analysis firms for the conduct of customer satisfaction measurements, marketing campaigns, and analysis activities.

vi. Emergency Response Teams

Your personal data may be shared with emergency response teams and relevant authorities to protect vital interests and prevent health and safety threats.

b. Transfer of Data Abroad

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.

During the transfer of your personal data, utmost care is taken to ensure confidentiality and security measures. Necessary agreements are made with third parties to ensure that they comply with their obligations to protect your personal data, and audits are conducted. All necessary technical and administrative measures are taken to protect your data.

6. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies on our website to improve your user experience and provide our services more efficiently. For more information about the data collected through cookies and how this data is used, please review our Cookie Policy.

7. SECURITY OF PERSONAL DATA

We implement various technical and administrative measures to ensure the security and protection of your personal data. These measures aim to protect your data against unauthorized access, loss, alteration, disclosure, and misuse.

a. Technical Measures:

- **Encryption:**
Advanced encryption methods are used to protect the confidentiality of your data.
- **Firewalls:**
Advanced firewalls and network security solutions are used to prevent unauthorized access.
- **Access Control:**
Access to personal data is limited to authorized personnel, and strong authentication methods are applied to prevent unauthorized access.
- **System Updates:**
We regularly update our software and systems and apply patches to minimize security vulnerabilities.
- **Malware Protection:**
We continuously scan and monitor our systems to protect against malware.

b. Administrative Measures:

- **Privacy Policies:**
We have established comprehensive privacy policies and procedures for the processing and protection of personal data.

- **Training and Awareness:**

We conduct regular training programs to raise awareness among our employees about data security and privacy.

- **Contracts and Commitments:**

We include data security provisions in the contracts we sign with our business partners and suppliers, and we obtain data protection commitments.

- **Data Masking:**

We use data masking techniques during the processing of sensitive data to prevent the actual content of the data from being exposed in the event of unauthorized access.

- **Audits and Controls:**

We regularly conduct internal and external audits to evaluate and improve the effectiveness of our data security policies.

These security measures are designed to ensure the integrity, confidentiality, and availability of your personal data. As Bosphore Medical, we follow best practices to fulfill our commitments to data security and continuously improve our security measures. If you have any questions or concerns regarding data security, please contact us.

8. DATA RETENTION AND DESTRUCTION PERIODS

Our data retention and destruction processes are conducted in full compliance with the principles and rules established under KVKK and GDPR. The retention periods for your personal data vary depending on the nature of the data, the purpose of processing, legal obligations, contractual obligations, and legitimate interests. In general, the retention period for your personal data is ten (10) years. This period is determined in accordance with legal requirements, contractual obligations, and legitimate interests.

When the retention period for personal data expires, the data is securely destroyed in accordance with applicable laws and our company policies. Data stored in physical form is destroyed using specialized shredding machines. Data stored in electronic form is deleted or anonymized in a way that makes it irrecoverable. Anonymization ensures that the data loses its nature as personal data and that identifying information cannot be determined.

9. RIGHTS OF DATA SUBJECTS

Under the relevant legislation, data subjects have the following rights:

- **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.

- **Right of Access:**

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

- **Right to Request Rectification:**

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

- **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.
- **Right to Restrict Processing:**
To request the restriction of the processing of your personal data under certain conditions.
- **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/processor, as well as to request that third parties to whom personal data is transferred be informed of such requests.
- **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.
- **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.

10. APPLICATION AND COMPLAINT

Data subjects may exercise their rights listed in Article 9 of this Privacy Policy and/or any other rights and authorities arising from the applicable legislation by sending a signed email to our Company's registered electronic mail address "bosphoremedikal@hs01.kep.tr" or by sending a written and signed request to our Company's headquarters at **Osmanağa Mah. Yoğurtçu Parkı Cad. Orkide Apt. No:4 K:2 D:3 Kadıköy/İstanbul**. You can access the **Data Subject Application Form** here.

Upon receipt of 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.

11. DATA BREACH NOTIFICATIONS

In the event of a data breach, necessary measures are taken quickly and effectively, and required notifications are made. When a data breach is detected, the data controller is immediately informed about the nature of the breach, the categories of personal data affected, the number of data subjects affected, and the potential consequences of the breach. Notification to the Personal Data Protection Authority will be made within 72 (seventy-two) hours of detecting the breach. This notification will detail the scope, consequences, and measures taken in response to the breach. Additionally, affected data subjects will be informed as soon as possible, providing information on how they have been impacted and what measures have been taken.

Comprehensive technical and administrative measures have been implemented by our Company to minimize the impact of the breach and prevent similar incidents in the future. In collaboration with relevant departments, the source of the breach is identified, and necessary corrective actions are applied. Throughout this process, protecting and informing the rights of data subjects remains a priority.

12. POLICY CHANGES

Our Privacy Policy is reviewed and updated periodically in line with legal regulations, our business processes, or changes in the services we provide.

Changes to our Privacy Policy are published on our website and made available to our users to ensure that they always have access to the most up-to-date information. In the case of significant changes, our users will be notified directly via email to inform them of the changes in our privacy policy. The updates published on our website will be effective from the date of publication.

13. CONTACT INFORMATION

If you have any questions or concerns about our privacy policy, you can always contact us through the following contact information:

Bosphore Medikal Sağlık Turizm ve Danışmanlık Hizmetleri Anonim Şirketi

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