

CLARIFICATION TEXT ON CAMERA RECORDINGS WITHIN THE SCOPE OF KVKK

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Personal data processing activities that are carried out by **PREDO SAĞLIK SAN. VE TİC. A.Ş.** (hereinafter referred to as "**PREDO SAĞLIK**") at building facility entrances and within the facility are carried out in accordance with the Constitution of the Republic of Turkey, the Law on the Protection of Personal Data ("KVKK Law") and other relevant legislation. In order to ensure security as a data controller in accordance with the KVKK Law, **PREDO SAĞLIK** carries out personal data processing activities in our Company's buildings, factories and facilities in order to monitor the entrance and exit of guests, subcontractors and their vehicles.

1. CAMERA SURVEILLANCE AND RECORDING ACTIVITIES CARRIED OUT AT ENTRANCES AND INSIDE BUILDINGS AND FACILITIES

PREDO SAĞLIK processes personal data by taking images with a closed circuit camera system in the Company premises in order to ensure legal, technical and commercial business security.

1.1. Legal Basis of Camera Surveillance Activity and Method of Collecting Personal Data

The camera monitoring and recording activity carried out by **PREDO SAĞLIK** is carried out in accordance with the Law No. 5188 on Private Security Services and the regulation on the implementation of this law and based on the legal reason based on the legitimate interest of our Company.

Personal data is collected within the framework of the personal data processing conditions specified in Articles 5 and 6 of the KVKK Law through closed circuit camera systems in electronic environment in order to ensure the security of **PREDO SAĞLIK**.

1.2. Execution of Monitoring Activities with Security Cameras in accordance with KVKK Law

PREDO SAĞLIK carries out security camera monitoring activities in order to ensure security in its facilities, for the purposes stipulated in the relevant legislation in force and in accordance with the personal data processing conditions listed in the KVKK Law.

1.3. Announcement of Camera Surveillance Activity

The personal data subject is enlightened by **PREDO SAĞLIK** in accordance with Article 10 of the KVKK Law.

PREDO SAĞLIK notifies with more than one method regarding the camera surveillance activity of its clarification regarding general issues. Thus, it is aimed to prevent damage to the fundamental rights and freedoms of the personal data subject, to ensure transparency and enlightenment of the personal data subject.

PREDO SAĞLIK hangs a notification letter regarding the surveillance at the entrances of the areas where monitoring is carried out by **PREDO SAĞLIK** for camera surveillance activity.

1.4. Purpose of and Limitation to the Purpose of Camera Surveillance

PREDO SAĞLIK processes personal data in a limited and measured manner in accordance with Article 4 of the KVKK Law, in connection with the purpose for which they are processed.

The purpose of maintaining closed circuit camera monitoring by **PREDO SAĞLIK** is limited to the purposes listed in this clarification text.

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In this direction, the monitoring areas, number and when to monitor the security cameras are sufficient to achieve the security purpose and are limited to this purpose.

Areas that may result in interference with the privacy of the person in a way that exceeds the security purposes (for example, masjids, toilets, etc.) are not subject to surveillance.

1.5. Ensuring the Security of the Data Obtained

In accordance with Article 12 of the KVK Law, necessary technical and administrative measures are taken by **PREDO SAĞLIK** to ensure the security of personal data obtained as a result of camera surveillance activity.

1.6. Retention Period of Personal Data Obtained through Camera Surveillance Activity

The retention period of personal data obtained by **PREDO SAĞLIK** by camera is 30 days.

1.7. To whom and for what purposes the obtained personal data will be transferred

A limited number of employees have access to the information obtained as a result of monitoring. Camera images can be transferred to authorized public institutions in accordance with the legislation in order to ensure the security of our company within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVK Law. (For example, with the written request of the prosecutor or judge during the investigation of an incident) As a result of the confidentiality agreement concluded between a limited number of persons who have access to the records and our company, the persons declare that they will protect the confidentiality of the data they access.

2. MONITORING THE ENTRY AND EXIT OF GUESTS AND SUBCONTRACTORS CARRIED OUT AT AND INSIDE THE FACILITY ENTRANCES

PREDO SAĞLIK carries out personal data processing activities to ensure security as a data controller in accordance with the KVK Law and to monitor the entry and exit of guests in **PREDO SAĞLIK** facilities for the purposes specified in this clarification text.

While the names and surnames of the people who come to **PREDO SAĞLIK** buildings as guests are obtained, or through the texts posted at **PREDO SAĞLIK** or otherwise made available to the guests, the personal data subjects in question are enlightened in this context. The data obtained for the purpose of tracking guest entry-exit are processed only for this purpose and the relevant personal data are collected and recorded in the data recording system based on the legal reason for the legitimate interest of our Company within the framework of the personal data processing conditions specified in Articles 5 and 6 of the KVK Law during the visit of the **PREDO SAĞLIK** building in the physical environment.

Personal data collected within the scope of visiting **PREDO SAĞLIK** buildings can be transferred to authorized public institutions in accordance with the legislation in order to ensure the security of **PREDO SAĞLIK** buildings within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVK Law.

3. PURPOSES OF PROCESSING, CATEGORIZATION AND RETENTION PERIODS OF PROCESSED PERSONAL DATA

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PREDO SAĞLIK informs the personal data subjects which personal data of which personal data subject groups are processed within the scope of the obligation to inform in accordance with Article 10 of the KVK Law, the purposes and storage periods of the personal data of the personal data subject.

4. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

Although **PREDO SAĞLIK** has processed the personal data subject to this clarification text in accordance with the provisions of the relevant law as regulated in Article 138 of the Turkish Penal Code and Article 7 of the KVK Law, in the event that the reasons requiring its processing disappear, **PREDO SAĞLIK** deletes, destroys or anonymizes personal data based on its own decision or upon the request of the personal data subject.

5. RIGHTS OF THE PERSONAL DATA SUBJECT LISTED IN ARTICLE 11 OF THE KVK LAW

We inform you that personal data subjects have the following rights pursuant to Article 11 of the KVK Law:

- To learn whether their personal data is being processed,
- To request information if their personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transactions made within this scope and in case of incomplete or incorrect processing of personal data to third parties to whom personal data is transferred,
- To object to the occurrence of a result to your detriment by analyzing the processed data exclusively through automated systems,
- To claim compensation for damages in case of damage due to unlawful processing of personal data.

You can submit your applications for your rights listed above to our Company by filling out the Application Form, which you can access through our general disclosure text at **unipredo.com**. Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.