

## CLARIFICATION TEXT

### ABOUT THE PROTECTION OF PERSONAL DATA IN ACCORDANCE WITH THE PROCEDURES AND PRINCIPLES OF THE LAW ON THE PROTECTION OF PERSONAL DATA NUMBERED 6698 ("KVKK")

**PREDO SAĞLIK SAN. VE TİC. A.Ş.** (hereinafter referred to as "**PREDO SAĞLIK**"), as the data controller;

- Regarding your personal data that you have shared with us,
- Within the scope of our commercial relations or within our business relationship with you;
- Within the framework of the purpose that requires their processing and in connection with this purpose, in a limited and measured manner,
- By maintaining the accuracy of the personal data you have shared and the most up-to-date version as you have notified us,
- We inform you that it will be recorded, stored, preserved, reorganized, shared with institutions authorized by law to request this personal data and transferred to domestic third parties under the conditions stipulated by the KVKK, transferred, classified and processed in other ways listed in the KVKK.

The purpose of this Clarification Text is to explain to you how and for what purposes we will process your personal data. Please read this Clarification Text carefully.

#### PROCESSING AND COLLECTION OF YOUR PERSONAL DATA

PREDO SAĞLIK collects personal data directly from data subjects or indirectly from third parties or from sources where it is made public verbally, physically or electronically and processes this personal data. You can access the table below about which personal data are collected and processed and how they are collected.

#### PERSONAL DATA COLLECTED FROM EMPLOYEES/EMPLOYEE CANDIDATES

Data Category	Where the Data is Obtained		
Identity Information	Information such as name, surname, mother's name, father's name, marital status, date of birth, photocopy of identity card or T.R. Identity Card, photocopy of driver's license	It is provided by you or your representative.	It is obtained from employment platforms such as Kariyer.net, LinkedIn, İşkur etc.
Contact Information	Information such as street address, telephone number, e-mail address	It is provided by you or your representative.	It is obtained from employment platforms such as Kariyer.net, LinkedIn, İşkur etc.
Financial Information	Monthly salary statements, insurance premium payment information	Bank details are provided by you.	Financial and salary details and bonus list are created by the company, and information on enforcement proceedings is obtained through notifications.

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Sensitive Personal Data	Criminal record, employment periodic examination form, psychotechnical certificate (report), religion section in the identity card, blood group section in the driver's license	Criminal record, photocopy of identity card or T.R. Identity Card, photocopy of driver's license are provided by you.	Health Reports are provided by the workplace physician.
Visual Data	Closed circuit security camera footage, identity card or T.R. Identity Card and photograph in driver's license	Photocopy of ID card or T.R. Identity Card, photocopy of driver's license, Photograph is provided by you or your representative.	Security camera images are obtained from the relevant devices.
Education Information	Educational background, photocopies of certificates and diplomas, education and skills, curriculum vitae (CV)	It is provided by you.	It is obtained from employment platforms such as Kariyer.net, LinkedIn, İşkur etc.
Family Members and Relatives Personal Information	Job title, CV, candidate application forms, last company information, such as family status forms, birth registration notification	It is provided by you.	It is obtained from employment platforms such as Kariyer.net, LinkedIn, İşkur etc.
Other	Vehicle information, demobilization certificate, SSI registration number, copy of license, SRC certificate, IP addresses and web browsing activities of the work computer used by employees, visitor information	Discharge certificate, license photocopy, SRC certificate are provided by you.	IP addresses, web surfing activities, SSI registration number are obtained by the company.

### PERSONAL DATA RECEIVED FROM SUPPLIERS

#### Data Category

#### Where the Data is Obtained

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Identity Information	Information such as name, surname, photocopy of identity card or T.R. Identity Card, signature	It is provided by you or your representative.	
Contact Information	Contact information such as street address, mobile phone number, e-mail address	It is provided by you or your representative.	
Financial Information	IBAN (Account number)	It is provided by you or your representative.	
Visual Data	Closed circuit security camera footage, identity card or T.R. Identity Card and photograph in driver's license	A photocopy of the identity card or T.R. Identity Card, photocopy of the driver's license is provided by you or your representative.	Security camera images are obtained through closed circuit security cameras.
Education Information	Educational status, photocopies of certificates and diplomas, OHS training certificate, training and skills information	Your Education Information is provided by you or your representative.	
Other	Information such as employment contracts, working hours, photocopy of driver's license, photocopy of registration, SRC2 certificate (Driver professional qualification)	A copy of the license, SRC2 certificate is provided by you or your representative.	Employment contracts and working hours are established by the Company.

### PERSONAL DATA RECEIVED FROM CUSTOMERS

#### Data Category

#### Where the Data is Obtained

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Identity Information	Information such as name, surname, photocopy of identity card or T.R. Identity Card, signature	It is provided by you or your representative.
Contact Information	Contact information such as street address, mobile phone number, e-mail address	It is provided by you or your representative.
Financial Information	Iban (Account number)	It is provided by you or your representative.

### PERSONAL DATA RECEIVED FROM VISITORS

Data Category	Where the Data is Obtained
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Identity Information	Name and surname of visitors	It is provided by you.
Contact Information	Phone, address, email	It is provided by you.
Visual Data	Closed circuit security camera footage	It is obtained through closed circuit security cameras.
Other	Vehicle information, person visited	It is provided by you.

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#### **FOR WHICH REASONS WE COLLECT YOUR PERSONAL DATA?**

We request this data from you for the following reasons;

- Your personal data may need to be collected by the Company in order to carry out the processes stipulated in the laws. Failure to provide this personal data may cause you not to benefit from some rights under the Labor Law and related legislation.
- Your personal data may need to be collected by the Company in order for the Company to fulfill its legal obligations under the relevant legislation. Failure of the Company to fulfill its legal obligations may cause the Company to be sanctioned for this reason and may prevent the fulfillment of your legal obligations through the Company.
- Your personal data may need to be collected by the Company for the performance of the contract between you and the Company. Failure to share your personal data we obtain here may cause your business relationship with the Company not to be carried out properly, some processes created by the Company for your benefit may not be fulfilled or it may become difficult for you to fulfill.
- The Company may collect your personal data in order to ensure its legitimate interest by always prioritizing your rights. Since the Company's purposes for collecting your personal data are the same as the purposes of processing, these legitimate interests are explained under the article "In particular to ensure the legitimate interests of the Company" under "Purposes of Processing Your Personal Data".

#### **PURPOSES OF PROCESSING YOUR PERSONAL DATA**

Your personal data may be processed by the data controller or legal/real persons to be appointed by it in accordance with the KVKK in the following cases;

- Authentication and record creation,
- Keeping financial and accounting records
- Fulfillment of legal obligations
- Safety review and audit
- Formulation of allegations and complaints of criminal offenses
- Conducting information security audits and ensuring confidentiality
- Providing and organizing training
- Occupational health and safety
- With the aim of determining whether you are suitable for the position sought, and if it is decided that you are not suitable, in order to evaluate you in similar positions,
- In order to open salary accounts for the personnel, to provide rental cars when necessary, to provide telephones, to provide telephone lines, to provide meal cards, to fulfill automatic individual pension transactions,
- For the purpose of various human resource applications,
- For emergency medical interventions,
- For the purpose of tracking and monitoring sick leave or monitoring the health conditions necessary for the Personnel to fulfill their duties;
- For the purpose of monitoring wage garnishments placed on the salary of the Personnel,
- For the purpose of ensuring and auditing the quality, information security and confidentiality policies and standards of PREDO SAĞLIK,
- For the purpose of organizing company travel,

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- In case of emergencies, for the purpose of contacting the persons given by the Personnel with their own consent,
- For the detection and control of entries and exits to and from work,
- For the purpose of preparing reporting and analysis to be made to senior management,
- Fulfillment of functions such as software, enterprise resource planning, reporting, marketing, etc,
- For the purpose of performance evaluation and determining remuneration policies,
- Benefiting from promotions and campaigns,
- Recording of camera footage for privacy and security reasons in the workplace,
- Fulfillment of the requirements determined by laws and regulations (tax legislation, social security legislation, law of obligations legislation, commercial law legislation, occupational health and safety law, legislation on electronic communication, etc. all relevant legislation)
- Fulfillment of obligations related to e-invoice, e-archive and e-delivery note,
- Fulfilling the requests of public institutions and organizations as required or mandated by legal regulations,
- Fulfillment of legal obligations specified in the KVKK.

In order to ensure the legitimate interests of the Company, in particular;

- Managing the company, running the business,
- Implementation of company policies.

Your personal data will be retained for the maximum period specified in the relevant legislation or required for the purpose for which they are processed, and in any case for the statutory limitation periods.

### TO WHOM AND FOR WHAT PURPOSE THE PROCESSED PERSONAL DATA MAY BE TRANSFERRED

Your processed personal data is shared with the following organizations at home or abroad, provided that it is limited to mandatory information:

- With banks to open salary accounts,
- Car rental companies in order to provide rental vehicles when necessary
- GSM operators to provide telephone lines where necessary,
- With private pension companies in order to fulfill the company's compulsory private pension obligations,
- With occupational health and safety companies, hospitals and healthcare organizations for emergency medical interventions and to fulfill occupational health and safety obligations,
- With suppliers and solution partners to fulfill functions such as software, enterprise resource planning, reporting, marketing, etc,
- Audit firms and information security firms to conduct the necessary quality, confidentiality and standard audits,
- With companies that process data on behalf of PREDO SAĞLIK (providing IT support, providing traffic / customer satisfaction measurement, profiling and segmentation support, providing support in the field of sales and marketing, especially sms, mailing, archiving, and providing support in matters where personal data should be processed),
- Due to the information technologies used by PREDO SAĞLIK, the servers located abroad and the companies that provide this server support and the companies that provide cloud computing services in cases where cloud computing is used,

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- With the relevant audit firms, private integrator firms, independent audit firms, customs firms, financial advisors/accounting firms, law offices in order to fulfill our obligations and audit our commercial activities in accordance with the provisions of the relevant legislation,
- With tourism and/or transportation companies and related suppliers for booking/promotion purposes,
- With the relevant suppliers in terms of the operability of the common database established by the company,
- Cargo companies in order to make deliveries when necessary,
- Organizations and companies requesting references about the employee,
- With public institutions and organizations in order to fulfill legal requirements and/or to fulfill the requests of official authorities.

The relevant information is shared with all related public institutions and organizations, especially the lawyers from whom the Companies receive legal services, the Common Health and Safety Unit, the Ministry of Labor and Social Security, the Social Security Institution, the Turkish Employment Agency, Law Enforcement Forces, and the Turkish Courts, by obtaining explicit consent in cases where explicit consent is required by law (except in cases where explicit consent is not required by law) and within the framework of the conditions determined by law.

### **RETENTION PERIOD OF PERSONAL DATA**

Your personal data will be stored for the above purposes as long as your employment contract continues. Your personal data, which is required to be kept by law, will be kept for 10 (ten) years after your employment contract ends in accordance with the social security legislation. In the event that the employment contract does not start with the candidate personnel, their personal data will be stored for 10 (ten) years in order to be evaluated in similar positions. After the expiration of the period, your personal data will be deleted, destroyed and/or anonymized by PREDO SAĞLIK or upon your request by methods within the scope of the Law on the Protection of Personal Data and related regulations. You can always withdraw your consent for the processing of personal data other than the data that must be processed by law.

### **EXCEPTIONS TO THE RIGHT OF APPLICATION**

Pursuant to Article 28 of the Personal Data Protection Law, it will not be possible for personal data subjects to assert their rights on the following issues:

- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics,
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or does not constitute a crime,
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security,
- Processing of personal data by judicial authorities or enforcement authorities in relation to investigation, prosecution, trial or execution procedures,
- Pursuant to Article 28/2 of the Personal Data Protection Law; it will not be possible for personal data subjects to assert their rights, except for the following cases, except for the request for compensation for the damage;

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- Processing of personal data is necessary for the prevention of crime or criminal investigation,
- Processing of personal data made public by the personal data subject itself,
- Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law,
- Processing of personal data is necessary for the protection of the economic and financial interests of the state in relation to budgetary, tax and fiscal matters.

Your requests in your application will be finalized free of charge within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost for the Company, the fee in the tariff determined by the Personal Data Protection Board in the Communiqué on the Procedures and Principles of Application to the Data Controller may be charged.

In matters related to the processing of your personal data, you must submit your application to our Company by filling out the application form on the Company's website, in writing in person or by using registered electronic mail (KEP) address, secure electronic signature, mobile signature. For detailed information, you can review the data subject application form and explanation on our website.

#### CONTACT INFORMATION

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BÖLGESİ/ŞEHİTKAMİL/GAZİANTEP**

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