

INTRODUCTION:

Protection of personal data is among the priorities of Predo Sağlık Ürünleri San. ve Tic. A.Ş. ("**Company**"). Within the framework of this Predo Sağlık Ürünleri San. ve Tic. A.Ş. Personal Data Protection and Processing Policy ("**Policy**"), the principles adopted in the execution of personal data processing activities carried out by our Company and the basic principles adopted in terms of compliance of our Company's data processing activities with the regulations contained in the Personal Data Protection Law No. 6698 ("**Law**") are explained and thus, our Company provides the necessary transparency by informing the personal data subjects. With full awareness of our responsibility within this scope, your personal data is processed and protected within the scope of this Policy.

The activities carried out by our Company regarding the protection of personal data of our employees are managed under the Predo Sağlık Ürünleri San. ve Tic. A.Ş. Employees Personal Data Protection and Processing Policy, which has been written in parallel with the principles in this Policy.

SCOPE:

This Policy relates to all personal data of persons other than employees of our Company, which are processed automatically or non-automatically provided that they are part of any data recording system.

ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA:

1. **Personal Data Security:** In accordance with Article 12 of the Law, our Company takes the necessary measures according to the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or other security deficiencies that may occur in other ways. In this context, our Company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board ("**Board**"), conducts audits or has them conducted.
2. **Security of Sensitive Personal Data:** Sensitive personal data are given special importance under the Law due to the risk of causing victimization or discrimination when processed unlawfully. These "sensitive" personal data include data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in terms of sensitive personal data and necessary audits are provided within our Company.

Detailed information on the processing of special categories of personal data is provided in the continuation of this Policy.

3. **Awareness and control:** Our Company ensures that necessary trainings are organized for business units in order to raise awareness to prevent unlawful processing of personal data, unlawful access to data and to ensure the protection of data.

KVKK activities of all units are audited at regular intervals, both planned and unplanned. If the results cause the need for regulation in the activities of the units, the application is updated immediately.

PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES STIPULATED IN THE LEGISLATION

1. Processing in accordance with the Law and Good Faith

Personal data are processed in accordance with the general rule of trust and honesty so as not to harm the fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent and limited to the extent required by the business activities of our Company.

2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

Our Company takes the necessary measures to ensure that personal data is accurate and up-to-date throughout the period of processing and establishes the necessary mechanisms to ensure the accuracy and currency of personal data for certain periods of time.

3. Processing for Specific, Explicit and Legitimate Purposes

Our Company clearly sets out the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with business activities.

4. Being relevant, limited and proportionate to the purpose for which they are processed

Our Company collects personal data only to the extent and quality required by its business activities and processes it limited to the specified purposes.

5. Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our Company first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data subject's application and with the specified destruction methods (deletion and/or destruction and/or anonymization).

CONDITIONS FOR PROCESSING PERSONAL DATA

Except for the explicit consent of the personal data subject, the basis of the personal data processing activity may be only one of the following conditions, or more than one condition may be the basis of the same personal data processing activity. In the event that the processed data is personal data of special nature, the following conditions in section 3.3 of this Policy ("Processing of Personal Data of Special Nature") shall apply.

a) The Condition of Explicit Consent of the Personal Data Subject

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be related to a specific subject, based on information and free will.

In the presence of the following personal data processing conditions, personal data may be processed without the explicit consent of the data subject.

b) Explicit Provision in the Laws

If the personal data of the data subject is explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, this data processing condition may be mentioned.

c) Failure to Obtain the Explicit Consent of the Data Subject Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect the life or physical integrity of himself/herself or another person.

d) Direct Relevance to the Establishment or Performance of the Contract

Provided that it is directly related to the establishment or performance of a contract to which the data subject is a party, this condition may be deemed to be fulfilled if it is necessary to process personal data.

e) The Condition that the Company Fulfills its Legal Obligation

Personal data of the data subject may be processed if processing is mandatory for our Company to fulfill its legal obligations.

f) The Condition for the Personal Data Subject to Make Personal Data Public

In case the data subject has made his/her personal data public, the relevant personal data may be processed limited to the purpose of publicization.

g) The Condition that Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data subject may be processed.

h) The Condition that Data Processing is Mandatory for the Legitimate Interest of our Company

Provided that it does not harm the fundamental rights and freedoms of the personal data subject, the personal data of the data subject may be processed if data processing is mandatory for the legitimate interests of our Company.

PURPOSES OF PROCESSING PERSONAL DATA PROCESSED BY OUR COMPANY

In accordance with Article 10 of the Law and secondary legislation, personal data are processed by our Company by informing the relevant persons in accordance with Article 10 of the Law and secondary legislation, in line with the personal data processing purposes of our Company, based on and limited to at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, in accordance with the general principles specified in the Law, especially the principles specified in Article 4 of the Law regarding the processing of personal data.

RIGHTS OF THE PERSONAL DATA SUBJECT

Personal data subjects have the following rights:

- (1) To learn whether personal data is being processed,
- (2) To request information if his/her personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- (4) To know the third parties to whom personal data are transferred domestically or abroad,
- (5) 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,
- (6) 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 transaction made within this scope to third parties to whom personal data is transferred,
- (7) To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- (8) In case of damage due to unlawful processing of personal data, to claim compensation for the damage.

Exercising the Rights of the Personal Data Subject

Personal data subjects will be able to submit their requests regarding their rights listed in the "Rights of the Personal Data Subject" to our Company by the methods determined by the Board. In addition, applications to predosaglik@hs02.kep.tr e-mail address will be accepted and evaluated in the same way.

Our Company's Response to Applications

Our Company takes the necessary administrative and technical measures to finalize the applications to be made by the personal data subject in accordance with the Law and secondary legislation.

In the event that the personal data subject duly submits his/her request regarding the rights specified in the "*Rights of the Personal Data Subject*" to our Company, our Company will finalize the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.