

# PRIVACY AND KVKK POLICY

As **PREDO SAĞLIK ÜRÜNLERİ SAN. VE TİC. A.Ş.** (hereinafter referred to as "**PREDO SAĞLIK**"), we would like to inform you that we attach importance to the protection of your Personal Data and that we take measures and steps in accordance with legal regulations in this field.

Our company takes the necessary measures to protect the personal data of our customers, suppliers, visitors, employees and other natural persons who establish a relationship with us by applying for a job or visiting our website or in any other way, and we have prepared this Personal Data Protection Policy and Privacy Policy in order to inform you about our Company rules and policies on the processing of personal data and the use of cookies and similar technologies within the framework of the Personal Data Protection Law No. 6698 ("KVKK Law").

We would like to remind you that you will be subject to the privacy policy contained in this text on the website named unipredo.com and **PREDO SAĞLIK**, and the confidentiality, protection, processing, use, utilization, modification, communications and other issues of customer, supplier, employee, candidate employee information, and that you should review this text to ensure that you accept the terms each time you use our website.

Depending on the type and nature of the relationship between our Company as the data controller and the data subject, it is possible for our Company to provide the data subject with personal data policies and/or notifications different from this text. In this case, such special policies and notifications provided to the data subject may contain matters different from or additional to the explanations contained in this Policy, and the special policies and notifications provided to the data subject by the data subject should be taken into consideration first.

## SCOPE OF THE POLICY

This Policy relates to all personal data of our customers, employees, employee candidates, visitors and customers whose personal data have been received through our company, employees of the institutions we cooperate with and third parties, which are processed automatically or non-automatically provided that they are part of any data recording system.

## MEASURES TAKEN TO ENSURE THE LAWFUL PROCESSING OF PERSONAL DATA

Our Company takes technical and administrative measures according to technological possibilities and cost of implementation in order to ensure that personal data is processed in accordance with the law.

## TECHNICAL MEASURES

The main technical measures taken by our Company to ensure the lawful processing of personal data are listed below:

- Personal data processing activities carried out within our Company are audited through technical systems established.
- The technical measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism.
- Departments have been established on technical issues and knowledgeable personnel are employed in this field.

## ADMINISTRATIVE MEASURES

Administrative measures taken by our Company for the lawful processing of personal data:

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- Our Company's employees, customers, suppliers and visitors are informed and trained on the law on the protection of personal data and the processing of personal data in accordance with the law.
- All personal data processing activities carried out by our Company are carried out in accordance with the personal data inventory and annexes created by analyzing all business units in detail.
- The personal data processing activities carried out by the relevant departments within our Company and the obligations to be fulfilled in order to ensure that these activities comply with the personal data processing conditions sought by the KVKK have been linked to written policies and procedures by our Company, and each business unit has been informed about this issue and the issues to be considered specific to the activity it carries out have been determined.
- The audit and management of the departments within our Company regarding personal data security is organized by the Information Security Committees. Awareness is created to ensure the legal requirements determined on a business unit basis, and the necessary administrative measures are implemented through internal policies, procedures and trainings to ensure the supervision of these issues and the continuity of the implementation.
- Service contracts and related documents between our Company and employees are accompanied by records containing information on personal data and data security, and additional protocols are made. Efforts have been made to create the necessary awareness for employees on this issue.

### **LEGAL BASIS AND GENERAL PRINCIPLES**

The protection of personal data is regulated primarily in Law No. 6698, Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed through These Publications, Law No. 6563 on the Regulation of Electronic Commerce and related secondary legislation. In addition, the Turkish Penal Code No. 5237 also stipulates a number of criminal sanctions for the protection of personal data.

In this context, when the Law on the Protection of Personal Data is examined, it is seen that the definition of "personal data" refers to all kinds of information regarding identified or identifiable natural persons. In other words, anonymous information, anonymized information and other data that cannot be associated with a specific person are not considered personal data under this Privacy Policy.

Data processing, on the other hand, refers to all kinds of operations that can be performed on personal data, such as obtaining, recording, storing, retaining, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system.

Our Company processes personal data in accordance with the principles listed below within the framework of the purposes specified in this Privacy Policy in order to take the necessary measures to protect confidentiality and to comply with all legal principles regarding the processing of personal data:

- Compliance with the law and good faith,
- Being accurate and up to date when necessary,

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- Processing for specific, explicit and legitimate purposes,
- Being relevant, limited and proportionate to the purpose for which they are processed,
- Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

### DATA PROCESSED BY AYRANPINAR GIDA TİCARET VE SANAYİ LİMİTED ŞİRKETİ

Our Company may process general and special categories of personal data with the explicit consent of the data subject or without explicit consent in cases stipulated in Articles 5 and 6 of the KVK Law. Although the general and special categories of data processed by our Company are exemplified below, which data will be processed for each data subject may vary depending on various factors such as the type of relationship between the data subject and our Company (customer, personnel, supplier, candidate personnel, etc.) and the communication channels used.

In line with the relevant legislation and the principles set out in this Policy, the following types of data may be processed by our Company in accordance with the type of relationship between the data subject and our Company (for example, customer, employee, business partner, service supplier, etc. relationship between our Company and our Company) and its nature:

- Data for identifying the data subject, such as name, surname, occupation, title, information about the institution/organization, educational background, work history, gender, marital status, citizenship status, tax liability status and information about the parent, guardian and proxy, if any,
- Data such as date of birth, place of birth, identity number in documents for identification purposes such as identity cards, passports and driver's licenses,
- Contact information such as address, telephone, e-mail and fax number of home, workplace or temporary place of residence,
- In the event that the data subject (customer-member) connects to our Company's website via social media accounts, the information that the data subject consents to be shared through those channels,
- Communication records such as telephone calls, e-mail correspondence and other audio and video data regarding the products purchased by the data subject,
- Internet protocol (IP) address, device ID, unique identifier information, device type, advertising ID, unique device icon, statistics on web page views, incoming and outgoing traffic information, routing URL, internet log information, location information, visited sites and information on transactions and actions performed through our websites, platforms, internet network and our advertising and e-mail content.

### Purposes for the Use of Personal Data

**PREDİ SAĞLIK** may process personal data for the purposes set out below in cases and to the extent permitted by the legislation and may be retained for the period required by these purposes.

- Fulfillment of legal and administrative obligations and exercise of rights arising from applicable legislation,

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- Providing information to public officials on matters related to public security upon request and as required by legislation,
- Negotiation, establishment and performance of contracts concluded/intended to be concluded (For example, the establishment of a distance sales contract between our Company and customers and the performance of the obligations undertaken pursuant to the distance sales contract and the contracts concluded under the relevant articles of the Law on Consumer Protection),
- Providing customers with a better shopping experience, identifying suitable products that customers may be interested in by taking into account their interests, informing customers about suitable products, informing them about campaigns, promotions and advantages, and providing an effective customer service,
- Providing suggestions and solutions to our customers by our contracted institutions and solution partners and informing our customers about the services we provide,
- Contacting our customers regarding the conditions, current status and updates of the contracts we have concluded under the distant sales contract and the relevant articles of the Law on Consumer Protection and providing the necessary information,
- Organizing all records and documents that will be the basis of the transaction in electronic (internet/mobile etc.) or paper environment,
- Evaluating customer complaints and suggestions regarding our products and services,
- Ensuring and improving coordination, cooperation and efficiency within or between units within our Company,
- Ensuring the security of the website and other electronic systems and physical environments used by our Company,
- Notification of changes in the legislation or in the rules and policies adopted by our Company or other notifications concerning the data subject,
- Investigation, detection, prevention and reporting of breaches of contract and law to the relevant administrative or judicial authorities,
- Resolution of existing and future legal disputes,
- Responding to requests and questions,
- Procurement of employee needs and execution, development and improvement of recruitment processes within the framework of our Company's human resources policies,
- Evaluating and finalizing the eligibility of job applications and contacting job applicants,
- Developing and improving our Company's human resources, public relations and marketing policies,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- Protecting the legitimate interests of our Company, provided that the fundamental rights and freedoms of the data subject are not harmed.

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## **Protection, Security and Audit of Your Personal Data**

Within the scope of the relevant legislation, our Company takes the necessary technical and administrative measures to ensure the appropriate level of security as a data controller in order to prevent unlawful processing of personal data and unlawful access to data and to ensure the protection of personal data. In this context, it is ensured that the business processes and activities of our Company are carried out in accordance with the internal policies and rules prepared for the protection of personal data. Studies are carried out to raise awareness among employees on the legislation on the protection of personal data and the internal policies and rules prepared in this direction, and necessary declarations and commitments are obtained from employees and persons and institutions that process data on behalf of our Company for the confidentiality and protection of data, and violations of these declarations and commitments are subject to certain sanctions. Necessary information security measures are implemented to prevent unauthorized access to personal data, and the adequacy of the measures taken is subject to periodic checks to continuously improve the existing data security system.

## **Sharing of Personal Data with 3rd Parties in Turkey/abroad and Retention Period**

Provided that complying with the general principles listed in Article 4 of the KVK Law and the conditions stipulated in Articles 8 and 9 and taking the necessary security measures, we may transfer personal data to third parties in the country and process and store them on servers or other electronic media located in the country for the purposes shown under the heading "Purposes of Processing Personal Data" of this Privacy Policy.

In this context, your personal data may be shared with program partner institutions and organizations that we cooperate with in order to carry out our activities, with domestic persons and institutions whose services we use for data storage, from which we receive physical server and/or cloud services, and with institutions from which we receive services for sending commercial electronic messages.

Except in cases where a longer period is required or permitted by law, our Company retains personal data only for the period necessary to fulfill the purposes specified in this Privacy Policy. Personal data whose retention period has expired are deleted, destroyed or anonymized by our Company within the framework of Article 7 of the KVK Law.

## **Rights of the Data Subject under the Law on the Protection of Personal Data**

As a data subject, pursuant to Article 11 of the KVK Law, if you wish to exercise any of the following rights as a data subject, you should review the Data Subject's Rights and Application Form on our website:

- 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 for their intended purpose,
- To know the third parties to whom personal data are transferred domestically,
- To request correction of personal data in case of incomplete or incorrect processing,
- To request the deletion or destruction of personal data in the event that the reasons requiring their processing disappear,

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- To request notification of correction and deletion to third parties to whom personal data are transferred,
- To object to the emergence of a result that is to your detriment by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, to claim compensation for the damage.

### **Method and Legal Grounds for Collection of Personal Data**

Your personal data may be obtained in written, verbal, audio or video recording or other physical or electronic forms for the purposes specified in this Privacy Policy within the framework of the conditions specified in Articles 5 and 6 of the KVK Law. Personal data may be collected through stores and other physical environments where data subjects may contact, website, mobile applications, social media and other public channels or through training, conferences and similar events organized or by investigation method.

Although we generally obtain personal data from data subjects, it is also possible to obtain personal data through business partners we work with within the framework of the conditions specified in Articles 5 and 6 of the KVK Law, and persons, institutions and organizations that are shown as references in job applications or are included in the applicant's work and education history, recruitment platforms, persons and institutions represented by the data subject / representing the data subject.