

As Sapiens Genetik ve Sağlık Hizmetleri Anonim Şirketi; We have prepared this clarification text in order to inform you, our Visitors, Online Visitors, Customers, Potential Customers, Supplier Employees, Supplier Authorities regarding the processing, storage and transfer of your personal data within the framework of the Personal Data Protection Law No. 6698 ("KVKK") and its activities arising from the relevant legislation and legal regulations.

1) What are the Categories of Personal Data We Process and for What Purposes?

Your personal information will be processed by Sapiens Genetik ve Sağlık Hizmetleri Anonim Şirketi as stipulated in Article 4.2 of the KVKK;

- (i) Compliance with the law and good faith,
- (ii) Accurate and, where necessary, up-to-date,
- (iii) Processing for specific, explicit and legitimate purposes,
- (iv) Being relevant, limited and proportionate to the purpose for which they are processed,
- (v) Retention for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed being taken,

In accordance with the principles of the Law, within the scope of our established and ongoing business relationships with our business partners (it is possible for a person to fall into more than one category), it may be processed for the purposes set out below.

A. Our Visitors

<u>Identity information of our visitors</u> (*e.g. name*, *surname*), <u>physical space security information</u> (*e.g. camera recordings*);

- a) creation and follow-up of visitor records,
- **b)** will be processed for the purposes of ensuring physical space security.

B. Our Online Visitors

<u>Transaction security information</u> (e.g. your IP address information), marketing information (e.g. cookie logs) and (if you have notified us*) identification and contact information (e.g. your e-mail address) of online visitors to our website;

- a) execution of activities in accordance with the legislation,
- **b)** execution of information security processes,
- c) follow-up of requests/complaints,
- d) conducting communication activities,
- e) Informing authorized persons, institutions and organizations,
- f) will be processed in order to provide you with access to our website via the internet.



C. Our patients

<u>Identity information</u>, <u>contact information</u>, <u>health information</u>, <u>legal transaction information</u> of our natural person customers or authorized and/or employees of our legal person customers;

- a) execution of activities in accordance with the legislation,
- b) Conducting financial and accounting affairs,
- c) execution/supervision of business activities,
- d) Execution of after-sales support services for goods/services,
- e) Execution of goods/service sales processes,
- f) Conducting marketing analysis studies,
- g) execution of contract processes,
- h) Informing authorized persons, institutions and organizations,
- i) ensuring physical space security,
- j) resolving legal disputes,
- k) carrying out storage and archive activities,
- I) Execution of risk management processes,
- m) Conducting commitment processes to the company/product/services,
- n) will be processed for the purposes of carrying out communication activities.

D. Potential Patients

<u>Identity information</u> and <u>contact information</u> of our natural person customers or legal entity customers' officials and/or employees;

- a) Managing the sales processes of goods/services,
- b) execution of contract processes,
- c) ensuring physical space security,
- d) will be processed for the purposes of conducting marketing analysis studies

E. Supplier Employee

<u>Identity information</u>, <u>contact information</u>, <u>physical space security information</u> of our supplier employee,

- a) conducting communication activities,
- b) execution/supervision of business activities,
- c) ensuring physical space security,
- d) execution of supply chain management processes,
- e) execution of logistics activities,
- f) execution of activities in accordance with the legislation,
- g) will be processed for the purposes of carrying out occupational health/safety activities.



F. Our Supplier Authorized

Identity information, contact information, physical location security information, customer transaction information, financial information, marketing information, legal transaction information of our natural person suppliers or legal person supplier authorities;

- a) execution/supervision of business activities,
- **b)** Execution of goods/service procurement processes,
- c) Conducting financial and accounting affairs,
- d) execution of contract processes,
- e) execution of investment processes,
- f) ensuring physical space security,
- g) will be processed for the purposes of follow-up and execution of legal affairs.

2) What are the Methods of Collecting Your Personal Data?

Your personal data categorized above are collected through physical means such as order forms, contracts, visitor forms or through information systems and electronic devices (e.g. telecommunication infrastructure, computers and telephones), third parties (e.g. KKB and Findeks), our website and other documents declared by the relevant person by automatic or non-automatic means.

3) What is the Legal Reason for Collecting Your Personal Data?

Your personal data, by Sapiens Genetik ve Sağlık Hizmetleri Anonim Şirketi; In line with the realization of the purposes described above, as specified in Article 5 of the KVKK;

- (i) It is expressly provided for by law,
- (ii) Provided that it is directly related to the conclusion or performance of a contract; it is necessary to process personal data of the parties to the contract,
- (iii) It is mandatory for the data controller to fulfill its legal obligation,
- (iv) Data processing is necessary for the establishment, exercise or protection of a right,
- (v) Provided that it does not harm the fundamental rights and freedoms of the data subject, it is processed based on the legal reasons that data processing is mandatory for the legitimate interests of the data controller.

4) Do We Transfer Your Personal Data to a Third Party?

a) Personal data of our visitors may be shared with law enforcement and judicial authorities for the purpose of resolving legal disputes and upon request in accordance with the relevant legislation.



- **b) Personal data of our online visitors** may be shared with judicial authorities and authorized public institutions and organizations for the purpose of resolving legal disputes and upon request in accordance with the relevant legislation.
- c) Personal data belonging to our patients may be transferred to authorized public institutions and organizations, medical secretaries, domestic and foreign laboratories that we cooperate with for medical diagnosis, private insurance companies, law offices, e-nabiz system, medula system and financial advisors for the purposes stated above, if necessary, in order to provide information to prosecutors, courts and relevant public officials upon request and in accordance with the legislation, in matters related to public security and legal disputes that may arise.
- **d)** Personal data of our potential patients may be transferred to the law firm and judicial authorities from which we receive services in order to be used as evidence in legal disputes that may arise in the future.
- e) Personal data belonging to our supplier employees are transferred to authorized public institutions and organizations for the purposes of conducting activities in accordance with the legislation, following and conducting legal affairs, informing authorized persons, institutions and organizations, conducting/supervising business activities within the scope stipulated by the legal regulation; to group companies, IT company, suppliers, cargo companies, banks and our financial advisor to the extent necessary for the proper performance of the service. In addition, such personal data may be transferred to the law firm and judicial authorities from which we receive services in order to be used as evidence in legal disputes that may arise in the future.
- e) The personal data belonging to our supplier officer, within the scope stipulated by legal regulations, are transferred to authorized public institutions and organizations for the purpose of conducting activities in accordance with the legislation, following and conducting legal affairs, informing authorized persons, institutions and organizations, conducting / supervising business activities; to group companies, IT company, suppliers, cargo companies, banks and our financial advisor to the extent necessary for the proper performance of the service. In addition, such personal data may be transferred to the law firm and judicial authorities from which we receive services in order to be used as evidence in legal disputes that may arise in the future.

5) Do We Transfer Your Personal Data Abroad?

As Sapiens Genetik ve Sağlık Hizmetleri Anonim Şirketi, we do not transfer your personal data abroad.



6) How Can You Exercise Your Rights Regarding Your Personal Data?

You can send us your requests within the scope of Article 11 of the KVKK regulating the rights of the relevant persons through the "Application Form to the Data Controller" prepared for your convenience in accordance with the "Communiqué on the Procedures and Principles of Application to the Data Controller" at the address "https://sapiens.com.tr/" of Sapiens Genetik ve Sağlık Hizmetleri Anonim Şirketi.

Data Controller: Sapiens Genetik ve Sağlık Hizmetleri Anonim Şirketi

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