

PRIVACY POLICY The aim is to increase the issue of protecting personal data, DENTAPOINT DIŞ HEALTH MEDİKAL HİZMETLERİ İNŞAAT PETROL ÜRÜNLERİ PAZARLAMA İÇ VE DIŞ TİCARET LİMİTED ŞİRKETİ corporate simple policy. As DENTAPOINT, in all commercial and social regular activities we carry out, utmost care and effort has been shown to protect the nature of everything from real persons, the confidentiality of personal data, or it has not been shared with a non-third party outside the regular or purpose of the legislation.

Before the Law No. 6698 on the Protection of Personal Data ("KVKK" or the Law), which started a new era in 2016 regarding personal data security, entered into force in the company, it has acted sensitively regarding the personal privacy and security of individuals. From now on, as DENTAPOINT, we undertake to comply with the principles, bases and procedures stipulated by the Law together with the universal basic principles related to this field.

Scope and Change First of all, we have endeavored to prepare this Policy document, which we present to the public and our interlocutors, in accordance with the basic principles and fundamentals listed in Law No. 6698.

Our Privacy Policy; While ensuring the life and protection of the automatically obtained data of our employees, potential customers, suppliers of goods and services, visitor partners, employee candidates, customers and employees of our businesses or other individual interlocutors, their institutional arrangements are made.

Personal data obtained from personal data owners with their explicit consent/approval or in accordance with other legal situations listed in the aforementioned Law; will be evaluated within the scope of our licensed and legitimate commercial interests, primarily to increase our product and service quality, human resources management, administrative and technical systems execution and financial growth. Apart from this, some data from the need options are anonymized in a way that cannot identify the owner in order to create a sustainable database. Therefore, it does not fall within the scope of Law No. 6698 and therefore this Policy.

As DENTAPOINT, we wish to review our Policy Document and all our internal regulations and regulations regarding personal data security, such as instructions, instructions, etc. that we have prepared based on this, in order to comply with the Law and to take more effective measures regarding data security.

BASIC RULES REGARDING PROCESSING PERSONAL DATA Being in compliance with the law and rules of honesty: DENTAPOINT attaches importance to the principles regarding the recorded record queries it collects or receives from other copies and their compliance with the law and rules of honesty.

Being accurate and up-to-date with the information: DENTAPOINT attaches importance to all data within the institution containing correct information, not containing incorrect information and finally, updating them if there is a change in personal data when it is communicated to it.

Processing for limited, clear and legitimate use: DENTAPOINT, data data only in a way limited to the features offered and providing approval from individuals during the service. You do not process, use or use data other than a work order.

The connection, limitation and moderation of their processing: DENTAPOINT is used only to the extent that the data is processed and the service can be continued.

It is not stored for the period necessary for the purpose of processing or changes in the relevant legislation: DENTAPOINT stores the data arising from the contracts as long as the requirements of the Law's conflict rules, trade and tax rules. Despite this, when this is eliminated, it anonymizes the data or. It deletes or destroys the products in accordance with the Personal Data Storage and Destruction Directive.

Data Minimization Principle According to this principle called the data minimization principle, the data reaching DENTAPOINT is processed by the system only as much as necessary. Therefore, which data we will play is determined according to the purpose. Unnecessary data is not collected. Excess information is not recorded, deleted or anonymized. These statistics are available.

Deletion, Destruction, Anonymization of Personal Data When the periods required by law to be stored are completed, the details of the analyses or other requirements are eliminated, these data are changed by the system or personal data is deleted, destroyed or anonymized upon the request of the relevant person. The relevant transactions are carried out in accordance with our corporate Personal Data Storage and Destruction.

Accuracy and Data Up-to-dateness The data within DENTAPOINT, It is processed in a regular manner and generally as declared by the relevant persons upon their declaration. DENTAPOINT is not obliged to investigate the accuracy of the data declared by customers or persons who contact DENTAPOINT, and this is not done legally and due to our working principles. The declared data is considered correct. The principle of accuracy and up-to-dateness of personal data has also been adopted by DENTAPOINT. Our company updates the personal data it has processed from official documents received or upon the request of the relevant person. It takes the necessary measures for this.

Privacy and Data Security

Personal data is confidential and DENTAPOINT complies with this confidentiality. Only authorized persons can access personal data within DENTAPOINT according to data categories. All necessary technical and administrative measures are taken within the possibilities to protect the personal data collected by DENTAPOINT and to prevent it from falling into the hands of unauthorized persons and to prevent the data owner from being victimized. Within this framework, it is ensured that the software complies with the standards, third parties are carefully selected and the Privacy Policy is complied with within DENTAPOINT. Third parties with whom we share personal data in accordance with the law are also requested to protect the data. **Data Processing Purposes**

All transactions defined as processing of personal data in the law will be carried out in accordance with the purposes specified in the Disclosure Text prepared regarding the processing of personal data.

Data of Customers, Prospective Customers, Business Partners

Collection and Processing of Data for Contractual Relationships

If a contractual relationship has been established with our customers and potential customers, the collected personal data may be used without the customer's consent (PDPL Art. 5). This use is made

in line with the purpose of the contract. Data is used to the extent of better execution of the contract and the requirements of the service and updated by contacting the customers when necessary.

Data of Business Partners

Our company adopts the principle of acting in accordance with the law when sharing data with business partners. Data is shared with business and solution partners with a commitment to data confidentiality and only to the extent required by the service, and these parties are requested to take measures to ensure data security.

Data Processing for Promotion, Awareness and Advertisement Purposes

DENTAPOINT uses electronic, visual and audio media such as websites, social media or printed materials in order to create awareness among the public and its interlocutors, to promote and market its goods and services, to promote its business or to increase its recognition with content such as campaigns, celebrations and wishes. Regardless of the category, the explicit consent of the data subject whose personal data is processed is a must.

It has the knowledge and awareness that when it is necessary to send electronic messages or SMS to the mobile devices of individuals for advertising purposes, the condition of obtaining prior consent must be fulfilled in accordance with the Regulation on Commercial Communication and Commercial Electronic Messages.

Data Processing Due to DENTAPOINT's Legal Obligation or Being Clearly Foreseen in the Law

Personal data may be processed without obtaining additional consent if the processing is clearly stated in the relevant legislation or for the purpose of fulfilling a legal obligation determined by the legislation. The type and scope of data processing must be necessary for the legally permitted data processing activity and must comply with the relevant legal provisions.

Data Processing

DENTAPOINT may process personal data in line with its legitimate purposes/interests for the products and services it offers. However, the data may not be used for any unlawful transactions or activities.

Processing of Special Data

DENTAPOINT takes all necessary administrative and technical measures determined by the Personal Data Protection Board in the processing of special personal data. Special personal data in our company is processed in accordance with the principles specified in the "Personal Data Protection and Processing Policy". In addition, the provisions of the Regulation on Personal Health Data are taken into account in the processing of health information in the special category.

Data Processed by Automatic Systems

DENTAPOINT acts in accordance with the Law regarding data processed through automatic systems. Information obtained from this data cannot be used against the person without the express consent of the person. However, DENTAPOINT can make decisions regarding the persons it will process using the data in its own system.

User Information and Internet

DENTAPOINT is a website used by itself (domain), and in the event of collection, processing and use of personal data on websites and other systems or applications, the relevant persons are informed about the privacy statement and, if necessary, cookies.

Data Belonging to Our Employees

Processing of Data for Business Relationship

Our employees' personal data is processed to the extent necessary in terms of labor law and social security legislation which cannot be processed without obtaining consent (PDPL Art. 5). However, DENTAPOINT ensures the confidentiality and protection of the data belonging to its employees.

Processing Due to Legal Obligations

DENTAPOINT may process the personal data of its employees without obtaining consent, provided that the processing is clearly stated in the relevant legislation or for the purpose of fulfilling a legal obligation determined by the legislation. This matter is limited to the obligations arising from the law.

Processing for the Benefit of Employees

DENTAPOINT may process personal data without obtaining consent for transactions that provide socio-economic benefits to its employees, such as private health insurances. DENTAPOINT may also process the data of its employees for disputes arising from business relationships.

Processing of Special Data

According to the Law, data related to the race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures of individuals, as well as biometric and genetic data are special personal data.

DENTAPOINT takes sufficient measures determined by the Board in addition to the consent of the relevant person in the processing of special personal data. Special personal data can be processed without the consent of the person only in cases permitted by the Law and special legislation such as the Occupational Health and Safety Law No. 6331 and to a limited extent, and the provisions of the Regulation on Personal Health Data are taken into account.

Data Processed by Automatic Systems

Employees' data processed by automatic systems can be used in DENTAPOINT internal promotions and performance evaluations. Our employees have the right to object to the result reached against them and they do this by complying with DENTAPOINT internal procedures. Employees' objections are also evaluated within DENTAPOINT.

Telecommunication and Internet

DENTAPOINT computers, telephones, e-mails and other applications allocated to employees are allocated to the employee only for business purposes. The employee cannot use any of these tools allocated to him/her by DENTAPOINT for his/her private purposes and communication. DENTAPOINT may control and audit all data on these tools.

Transfer of Personal Data Domestically and Internationally

DENTAPOINT may share data with shareholders and board members in line with the requirements of administrative transactions and activities related to the top management and with solution partners due to administrative and commercial obligations brought by the business partnership.

In addition, personal data that we procure from external suppliers of goods and services (servers, cloud services, etc.) and to ensure that the goods and services required for the fulfillment of our Company's commercial activities are provided may be transferred to our Company's suppliers.

Therefore, DENTAPOINT is authorized to transfer personal data domestically and internationally in accordance with other conditions in the Law and subject to the approval of the person within the conditions determined by the Board.

Rights of the Relevant Person

As a Data Owner, you have the rights clearly listed in Article 11 of the Personal Data Protection Law No. 6698 in order to ensure that you have control over the fate of your personal data. When exercising these rights, you can obtain a special Application Form that we have created to facilitate and assist you from our website upon your request.

Regarding personal data, you can apply to the relevant person announced by DENTAPOINT on our website;

- a) You have the right to learn whether your personal data has been processed,
- b) If your personal data has been processed, to request information about it,
- c) To learn the purpose of processing personal data and whether it is used in accordance with its purpose,
- ç) To know the third parties to whom personal data is transferred domestically or abroad,
- d) To request correction of personal data if it is processed incompletely or incorrectly,
- e) To request deletion or destruction of personal data within the framework of the conditions stipulated in Article 7,
- f) To request notification of the transactions made pursuant to clauses (d) and (e) to third parties to whom personal data is transferred,

g) To object to the emergence of a result against the person by exclusively analyzing the processed data through automated systems,

ğ) To request compensation for the damages incurred due to the unlawful processing of personal data.

However, individuals do not have any rights regarding anonymized data within DENTAPOINT. DENTAPOINT may share its records containing personal data with relevant institutions and organizations in accordance with the business and contractual relationship, for the purpose of exercising the legal powers of a judicial duty or state authority. As personal data owners, you can submit your requests regarding your rights specified above by filling out the application form, which you can obtain from DENTAPOINT's official website, and also submitting your wet signature and a photocopy of your ID (only a photocopy of the front face for the ID card)

(sufficient) and send it to our correspondence address or contact us via our KEP address. Your applications will be answered as soon as possible depending on the content of your application or within 30 days at the latest after it reaches our Company. You must make your applications by coming to our Company in person, through a notary, or by sending an e-mail to our Corporate e-mail address from the e-mail address you have provided to us. In addition, only the part of your applications that concerns you will be answered, and an application made about your spouse, relative or friend will not be accepted.

DENTAPOINT may request other relevant information and documents from applicants if necessary.

Privacy Policy

The data of employees or other persons in DENTAPOINT is confidential. No one may use, copy, reproduce, transfer this data to others or use it for purposes other than business purposes without a contract or compliance with the law.

Transaction Security

All necessary technical and administrative measures are taken within the possibilities to protect the personal data collected by DENTAPOINT and to prevent it from falling into the hands of unauthorized persons and to prevent our customers and prospective customers from being victimized. Within this framework, it is ensured that the software complies with the standards, third parties are carefully selected and the Privacy Policy is also observed within DENTAPOINT. Security measures are constantly renewed and improved.

Audit

In accordance with the mandatory provision in Article 12 of the Law, DENTAPOINT, as the data controller, is audited by DENTAPOINT Managers regarding the protection of personal data and external audits are carried out when necessary.

Notification of Violations

DENTAPOINT acts with the awareness that it must notify the Personal Data Protection Board without delay and within 72 hours at the latest from the date of learning of any violations related to personal data when it is notified. It minimizes the damage to the relevant party and compensates for the damage. In case personal data is obtained by unauthorized persons from outside, it immediately notifies the Personal Data Protection Board.

You can apply for the notification of violations according to the procedures specified on our corporate website.