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1. PURPOSE

In the stages of preservation, processing, and transfer of your personal data in accordance with the Law on the Protection of Personal Data No. 6698 ("KVKK") and the principle of privacy of private life and protection of fundamental rights and freedoms of individuals, Bimed Teknik Aletler San. A.Ş., acting as a data controller and takes the necessary precautions. We would like to inform you about these issues.

Therefore, without being limited to those listed; we carry out the processing, storage, and transfer of all personal data acquired during our activities concerning our employees, visitors, business partners, customers, users visiting our website, and in short, all personal data according to the Personal Data Protection and Processing Policy ("Policy").

For the protection of personal data, we take all administrative and technical protection measures required by the nature of the relevant data in accordance with the legislation and up-to-date technology.

2. SCOPE

Not limited to those listed; The transactions regarding the processing, storage and transfer of data regarding all personal data of our employees, visitors, business partners, customers, users visiting our website, in short, all personal data we obtain during our activities, Bimed Teknik Aletler San. A.Ş. all personal data processed by this Policy is within the scope of this Policy.

The protection of personal data applies only to natural persons, and information concerning legal entities, which does not contain information relating to natural persons, is excluded from personal data protection. Therefore, this Policy does not apply to data pertaining to legal entities.

Our policy, applied to all activities related to the processing of personal data owned by or managed by Bimed Teknik Aletler San. ve Tic. A.Ş., is prepared and implemented in accordance with the Protection of Personal Data Law, relevant legislation concerning personal data, and international standards in this field.


3. DEFINITIONS and ABBREVIATIONS

This section provides brief explanations of special terms, expressions, concepts, abbreviations, etc., mentioned in the Policy.

3.1. Company Name: Bimed Teknik Aletler San. ve Tic. A.Ş.


3.2. Explicit Consent: Consent given on a specific subject, based on information and free will, in a clear way that leaves no room for hesitation, limited to that transaction only.

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- 3.3. Anonymization:** Anonymization is the process of rendering personal data in such a way that it can never be associated with or linked to an identified or identifiable individual, even when combined with other data.
- 3.4. Employee:** Employee refers to the personnel of Bimed Teknik Aletler San. ve Tic. A.Ş.
- 3.5. Former Employee:** Former Employee refers to the personnel who have worked within the structure of Bimed Teknik Aletler San. ve Tic. A.Ş. and have either voluntarily terminated their employment contract or have had their employment contract terminated.
- 3.6. Employee Candidate:** Candidate Employee refers to individuals who are not currently employed within Bimed Teknik Aletler San. ve Tic. A.Ş. but are being considered for employment positions.
- 3.7. Personal Data Subject (Data Owner):** The individual whose personal data is being processed. For example, Customers, suppliers, visitors, employees, and job applicants
- 3.8. Personal Data:** Any kind of information pertaining to an identified or identifiable natural person.
- 3.9. Sensitive Personal Data:** Data related to individuals' race, ethnic origin, political opinions, philosophical beliefs, religion, sect, or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.
- 3.10. Processing of Personal Data:** Any operation performed on personal data, whether by automated means or not, such as collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, retrieval, classification, or prevention of use of data.
- 3.11. Data Processor:** A natural or legal person who processes personal data on behalf of the data controller based on the authorization given by the data controller.
- 3.12. Data Controller:** The natural or legal person responsible for the establishment and management of the data recording system, determining the purposes and means of processing personal data.
- 3.13. Data System:** The record system where personal data is processed based on specific criteria.
- 3.14. Personal Data Protection Board:** The regulatory authority responsible for overseeing and enforcing compliance with the Personal Data Protection Law.
- 3.15. Personal Data Protection Authority:** The institution responsible for the implementation and enforcement of the Personal Data Protection Law.

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3.16. Personal Data Protection Law: The Personal Data Protection Law, published in the Official Gazette dated April 7, 2016, and numbered 29677.

3.17. KEP: Registered Electronic Mail address. It is a system that ensures the secure transmission of all kinds of commercial and legal correspondence and document sharing, identifies the recipient conclusively, ensures that the content remains unchanged, and makes the content legally valid, secure, and conclusive evidence.

3.18. Policy: The Policy on Protection and Processing of Personal Data.

4. PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

One of the key priorities for our company is to adhere to the general principles prescribed by the legislation regarding the processing of personal data. In this regard, our company must act in accordance with the Constitution of the Republic of Turkey, the laws, and the Law on the Protection of Personal Data in processing personal data. Below are the principles that our company must adhere to:

4.1. Conducting Personal Data Processing Activities in Compliance with Law and Integrity

Our company must conduct personal data processing activities in compliance with Article 4 of the Personal Data Protection Law, adhering to the principles of lawfulness and integrity. This includes processing personal data accurately and keeping it up to date when necessary, pursuing specific, clear, and legitimate purposes, ensuring that the processing is relevant, limited, and proportionate to the intended purposes. Our company should also consider the necessity of proportionality in processing personal data and refrain from using personal data beyond what is required by the purpose.

4.2. Ensuring the Accuracy and Timeliness of Personal Data

Our company must ensure that the personal data it processes is accurate and up-to-date, taking into account the fundamental rights of the data subjects and their legitimate interests. In this regard, necessary measures should be taken to establish systems aimed at ensuring the accuracy and timeliness of personal data.

4.3. Processing for Specific, Explicit, and Legitimate Purposes

Our company must process personal data for legitimate and lawful reasons. Our company should process personal data only to the extent necessary and in connection with the activities it carries out. Before starting any personal data processing activity, the purposes for which personal data will be processed by our company must be determined.

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5. OBLIGATIONS REGARDING THE PROTECTION AND PROCESSING OF PERSONAL DATA BY OUR COMPANY

5.1. Obligation to Register with the Data Controllers Registry

Our company must register with the Data Controllers Registry within the period determined and announced by the Personal Data Protection Board before commencing data processing activities.

The following information should be provided in the registration application to the Data Controllers Registry

- (1) Identity and address information of our company as the data controller and, if applicable, its representative.
- (2) The purposes for which personal data will be processed.
- (3) Explanations regarding the groups of data subjects and categories of data concerning these individuals.
- (4) Recipients or recipient groups to whom personal data may be transferred.
- (5) Personal data envisaged to be transferred to foreign countries.
- (6) Measures taken for personal data security.
- (7) Maximum duration required for the purposes of processing personal data.

5.2. Obligation to Inform the Personal Data Owner

During the collection of personal data, our company must inform the data subject about the following matters:

- (1) The identity of the data controller, including any representatives of the Community Company, if applicable.
- (2) The purposes for which personal data will be processed.
- (3) To whom and for what purpose the personal data may be transferred.
- (4) The method of collecting personal data and the legal reasons for such processing.
- (5) The rights of the data owner, including:
 - Learning whether personal data is being processed,
 - Learning the purpose of processing and whether it is used for that purpose,

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-Knowing the recipients to whom the personal data have been disclosed,

-Requesting correction of incomplete or inaccurate data and deletion of personal data if the conditions are met, and having these requests transmitted to third parties,

-Objecting to the occurrence of a result against oneself through the exclusive analysis of processed data by automated systems,

-Claiming compensation for damages suffered due to unlawful processing. In this context, channels for collecting personal data should be identified for fulfilling the obligation to inform; information points and texts compliant with the scope and conditions required by the Personal Data Protection Law should be determined; and appropriate processes should be designed accordingly.

5.3. Our Obligation to Ensure Data Security

In accordance with Article 12 of the Personal Data Protection Law, our company must take necessary technical and administrative measures to ensure an adequate level of security to prevent unlawful processing of personal data, unauthorized access to data, and to safeguard the data. In this regard, our company should conduct or arrange necessary audits to fulfill this obligation.

6. CLASSIFICATION OF PERSONAL DATA

6.1. Personal Data

Personal data; It is any information relating to an identified or identifiable natural person. The protection of personal data is only related to natural persons, and information belonging to legal entities that do not contain information about the real person is excluded from personal data protection. Therefore, this Policy does not apply to data belonging to legal entities.

6.2. Sensitive Personal Data:

Special categories of personal data include information regarding a person's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, disguise and dress, membership in associations, foundations, or unions, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.

7. TRANSFER OF PERSONAL DATA

7.1. Domestic Transfer of Personal Data

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Bimed Teknik Aletler San. ve Tic. A.Ş. must comply with the provisions stipulated in the Law on the Protection of Personal Data and the decisions and regulations issued by the Personal Data Protection Board regarding the transfer of personal data.

Subject to the exceptional cases stipulated in the legislation, personal data and special categories of data shall not be transferred to other individuals or legal entities by us without the explicit consent of the Data Subject.

In exceptional cases prescribed by the law and other relevant legislation, data may be transferred to administrative or judicial authorities authorized within the limits and manner prescribed by the legislation, even without the explicit consent of the Data Subject.

Special categories of personal data relating to the Data Subject's health and sexual life may only be transferred without explicit consent for the purposes of protecting public health, conducting preventive medicine, providing medical diagnosis, treatment, and care services, planning and managing healthcare services and financing, or to individuals or authorized institutions or organizations under the obligation of confidentiality, in accordance with the measures prescribed by the Personal Data Protection Board and relevant legislation.

7.2. Transfer of Personal Data Abroad

Personal data is not transferred abroad without the explicit consent of the Data Subject as a rule. However, in case of transfer abroad, it is necessary to ensure adequate protection in the foreign country where the personal data will be transferred, and in the absence of adequate protection, compliance with the written commitment of sufficient protection by data controllers in Turkey and the relevant foreign country and obtaining the permission of the Board will be ensured.

7.3. Institutions and Organizations to Which Personal Data is Transferred

Personal data may be transferred but not limited to the following;

1. Our suppliers,
2. Our business partners and professional connections,
3. Our affiliates,
4. Legally authorized public institutions and organizations, and group companies,
5. Legally authorized private legal entities,
6. Our shareholders, in accordance with the principles and rules described above.

7.4. Measures Taken for Lawful Transfer of Personal Data

7.4.1. Technical Measures

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In order to protect personal data, we undertake the following, but not limited to:

1. Conducting legality checks on all activities carried out by the Company's business units from data collection to deletion.
2. Establishing internal technical organization for the lawful processing and storage of personal data,
3. Creating technical infrastructure to ensure the security of databases where your personal data will be stored,
4. Monitoring and conducting audits of the processes of the established technical infrastructure,
5. Defining procedures for reporting on the technical measures taken and audit processes,
6. Periodically updating and renewing technical measures,
7. Reviewing risky situations to develop necessary technological solutions,
8. Utilizing antivirus protection systems, firewalls, and similar software or hardware security products, and establishing security systems in line with technological developments,
9. Accessing data through VPN connections,
10. Employing personnel with expertise in technical matters.

7.4.2. Administrative Measures


In order to protect your personal data, we undertake the following, but not limited to:

1. Informing and educating our employees about the laws on personal data protection and the lawful processing of personal data.
2. Including records in contracts, documents, and policies governing the legal relationship between our company and employees, stipulating the obligation not to process, disclose, or use personal data in violation of the regulations of the Law on the Protection of Personal Data.
3. Access to personal data should be limited to relevant company employees for the purpose of processing, and not every employee within the company should have access to every personal data held by the company.
4. Awareness should be created within relevant business units by companies to ensure legal compliance determined by each business unit, and implementation rules should be established. Companies should take necessary administrative measures to ensure the monitoring of these matters and the continuity of implementation, by implementing policies, procedures, and training. Audits should be conducted to ensure the security of the data.

8. STORAGE OF PERSONAL DATA

8.1.1. Storage of Personal Data for the Period Prescribed by Relevant Legislation or for the Purpose for Which They Were Processed

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Personal data are stored for the period prescribed by legislation, with the provision that the storage periods stipulated by legislation are reserved, and as long as necessary for the purpose of processing and continuity of products and services. In cases where personal data are processed for multiple purposes, if there is no legal obstacle to the deletion, destruction, or anonymization of data upon the cessation of processing purposes or at the request of the data subject, the data are deleted, destroyed, or anonymized. Compliance with legal provisions and decisions of the Personal Data Protection Board is ensured regarding deletion, destruction, or anonymization.

8.2. Measures Taken for the Storage of Personal Data

8.2.1. Technical Measures

1. We establish technical infrastructure and control mechanisms for the deletion, destruction, and anonymization of personal data,
2. We take necessary measures to securely store personal data,
3. We employ personnel with technical expertise and/or obtain support services.
4. We develop systems for business continuity and emergency plans against potential risks and ensure their implementation.
5. We implement security systems for storage areas of personal data according to technological advancements.

8.2.2. Administrative Measures

1. We raise awareness among our employees regarding technical and administrative risks associated with the storage of personal data.
2. In cases of collaboration with third parties for the storage of personal data, we include provisions in contracts with these parties ensuring that necessary security measures are taken for the protection and secure storage of transferred personal data.

9. PERSONAL DATA SECURITY

9.1. Our Obligations Regarding the Security of Personal Data

Personal data:

1. We take administrative and technical measures, considering technological capabilities and implementation costs, to prevent unlawful processing.
2. We take administrative and technical measures, considering technological capabilities and implementation costs, to prevent unlawful access.,
3. We take administrative and technical measures, considering technological capabilities and implementation costs, to ensure lawful storage of personal data.

9.2. Measures Taken to Prevent Unlawful Processing of Personal Data

1. We conduct and ensure necessary audits within our company,
2. We educate and inform our employees about the lawful processing of personal data.

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3. The activities conducted by our company are thoroughly evaluated across all departments, and based on this evaluation, relevant units process personal data in line with their commercial activities,
4. In cases where we collaborate with third parties for the processing of personal data, we include provisions in contracts with these entities to ensure that necessary security measures are taken by them,
5. In the event of unlawful disclosure of personal data or data breaches, we report the situation to the Personal Data Protection Authority, conduct investigations as required by legislation, and take necessary measures.

9.2.1. Measures Taken to Prevent Unauthorized Access to Personal Data

To prevent unauthorized access to personal data, we undertake the following technical and administrative measures;

1. Employing personnel with technical expertise,
2. Periodically updating and renewing technical measures,
3. Establishing procedures for reporting on the implementation of technical measures and audit processes.
4. Ensuring that data recording systems used in our company are compliant with regulations and conducting periodic audits of these systems.
5. Developing systems for emergency response plans to address potential risks and ensuring their implementation.
6. Providing training and information to our employees on accessing and authorizing personal data,
7. When collaborating with third parties for activities such as processing and storing personal data, ensuring that access to personal data by these companies is limited and governed by contractual terms, including provisions related to security measures
8. To prevent unauthorized access to personal data, we establish security systems incorporating technological advancements.

9.2.2. In The Event of Unauthorized Disclosure of Personal Data

We take administrative and technical measures to prevent unlawful disclosure of personal data and update them in accordance with our relevant procedures. In the event of unauthorized disclosure of personal data being detected, we establish systems and infrastructure to notify the Data Subject and the DPA (Data Protection Authority). Despite all administrative and technical measures taken, if an unlawful disclosure occurs, the DPA may, if deemed necessary, announce this situation on its website or through other means.

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10. DELETION AND DESTRUCTION OF PERSONAL DATA

Your personal data processed within the scope of the Personal Data Protection Law will be deleted, destroyed, or anonymized by our company in accordance with the decision to be taken or at the request of the data subject, within the framework of a record to be kept by the data controller and data processor, once the reasons requiring processing have ceased to exist and after the expiration of legal retention periods.

Other provisions regarding the deletion, destruction, or anonymization of personal data in other laws are reserved.

As deletion or destruction techniques, our company:

Electronically stored data is deleted and destroyed in a way that cannot be recovered by the Company's expert technical personnel or the expert to be contracted.

Physical documents are destroyed within the scope of the report to be kept by the data controller and the data processor.

11. RIGHTS OF THE DATA SUBJECT


Data subjects have the right to request information about their own data by applying in writing or through other methods determined by the Personal Data Protection Board.

In this regard, Group Companies must establish and implement procedures and processes in accordance with Article 13 of the Law on the Protection of Personal Data for the evaluation of data subjects' rights, providing necessary channels for applications, assessment of applications, internal procedures, responding to applications within the periods prescribed in the Law, and other administrative and technical regulations related to procedures and processes.

In this context, data subjects have the following rights:

- To learn whether personal data is being processed,
- If personal data has been processed, to request information regarding this,
- To learn the purpose of processing personal data and whether they are being used for their intended purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- If personal data is incomplete or incorrectly processed, to request their correction and, in this context, to request that the operation be notified to third parties to whom the personal data has been transferred,

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-To request the deletion or destruction of personal data in case the reasons requiring the processing of personal data cease to exist, despite being processed in compliance with the Law on the Protection of Personal Data and other relevant laws, and to request that the operation be notified to third parties to whom the personal data has been transferred,

-To object to the occurrence of a result against the individual due to the exclusive analysis of processed data through automated systems,

In case of suffering damage due to the unlawful processing of personal data, to request the compensation of the damage.

In the event that personal data owners submit their requests regarding their rights listed above to our Company in writing, our Company must conclude the relevant request free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request.

When processing the relevant application, Group Companies must provide information in a language and format that the individual can understand.

In cases where the personal data owner finds the application rejected, finds the answer insufficient or does not receive a respond to the application in due time, necessary warnings should be made and awareness should be raised within the Company that he has the right to file a complaint with the Personal Data Protection Board within 30 days and in any case within 60 (sixty) days from the date of application.

11.1. Exercise of Personal Data Rights

If the Data Owner wishes to contact our company under the scope of the Personal Protection Law, provide feedback, or manage their issues, they may send their petition containing their identification documents and request to our address, deliver it via a notary, or securely transmit it electronically signed to kvkk@bimedteknik.com.

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