

AVİXA İLAÇ SANAYİ VE TİCARET LİMİTED ŞİRKETİ

PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. INTRODUCTION

1.1. Purpose and Scope

The “Personal Data Protection Law No. 6698” (“Law”) entered into force on April 7, 2016 and this “Avixa İlaç Personal Data Processing and Protection Policy” (“Policy”) has been prepared and put into effect for the purposes of ensuring the compliance of Avixa İlaç Sanayi ve Ticaret Limited Şirketi (“Company” or “Avixa İlaç”) with the Law and determining the principles to be followed by Avixa İlaç in fulfilling its obligations regarding the protection and processing of personal data.

This Policy determines the conditions for processing personal data and sets out the main principles adopted by Avixa İlaç in the processing of personal data. In this context, the Policy contains general explanations covering all personal data processing activities within the scope of the Law carried out by the Company for persons other than Avixa İlaç employees and all personal data owners whose personal data are processed by Avixa İlaç. Regarding the processes in which the personal data and sensitive personal data of the data subjects are processed, clarification texts prepared separately for the processes are presented.

1.2. Enforcement and Amendment

This Policy has been approved by Avixa İlaç and entered into force.

The Company reserves the right to make changes to the Policy in line with legal regulations. The current version of the policy can be accessed on the Avixa İlaç website.

In case of conflict with the legislation in force, especially the Law, and the regulations in this Policy, the provisions of the applicable legislation will be applied.

2. PRINCIPLES AND CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

2.1. Principles Regarding the Processing of Personal Data

Personal data is processed by Avixa İlaç in accordance with the personal data processing principles in Article 4 of the Law. These principles must be complied with in terms of each personal data processing activity:

- **Processing of personal data in accordance with the law and good faith;** The Company processes Personal Data in accordance with the law and the rules of good faith and on the basis of proportionality; attaches importance to processing personal data limited to the purpose of processing and taking into account the reasonable expectations of the person concerned.

- **Personal data is accurate and up-to-date;** The Company takes all necessary measures to ensure that the Personal Data is complete, accurate and up-to-date, and updates the relevant Personal Data in case the Data Subject requests changes to the Personal Data within the scope of the KVKK Regulations.

- **Processing of personal data for specific, explicit, and legitimate purposes;** Before the Processing of Personal Data, the purpose for which the Personal Data will be processed is determined by the Company. In this context, the Data Subject is enlightened within the scope of KVK Regulations and their Explicit Consent is obtained when necessary.
- **Personal data is relevant, limited and proportionate to the purpose for which it is processed;** Data processing activities by Avixa İlaç are limited to the personal data required to achieve the purpose of collection, and necessary steps are taken to prevent the processing of personal data that is not related to this purpose.
- **Storing personal data for the period stipulated in the legislation or required by the purposes of processing;** The Company retains Personal Data for as long as necessary in accordance with the purpose. In the event that the Company wishes to retain Personal Data for a longer period than the period stipulated in the KVK Regulations or required by the purpose of Personal Data Processing, the Company acts in accordance with the obligations specified in the KVK Regulations. After the period required by the purpose of Personal Data Processing expires, Personal Data is Deleted or Anonymized. In this case, it is ensured that the third parties to whom the Company transfers the Personal Data also delete, destroy or anonymize the Personal Data.
- The Data Controller Representative and the Committee are responsible for the operation of the Deletion, Destruction and Anonymization processes. In this context, the necessary procedure is established by the Data Controller Representative and the Committee.

2.2. Conditions Regarding the Processing of Personal Data

Your personal data is processed by the Company in the presence of at least one of the personal data processing conditions in Article 5 of the Law. Explanations regarding these conditions are given below:

- **In cases where the explicit consent of the Relevant Person and** other data processing conditions do not exist, in accordance with the general principles set out under heading 3.1, the personal data of the data subject may be processed by Avixa İlaç with the free will of the person concerned, with sufficient information about the personal data processing activity, without hesitation and limited to that transaction only.
- **If the personal data processing activity is clearly stipulated in the laws,** personal data may be processed by Avixa İlaç without the explicit consent of the person concerned. In this case, the Company will process personal data within the framework of the relevant legal regulation.
- **In the event that the explicit consent of the person concerned cannot be obtained due to actual impossibility and personal data processing is mandatory,** the personal data of the person concerned, who is unable to disclose his/her consent or whose consent cannot be validated, will be processed by Avixa İlaç in the event that personal data processing is mandatory in order to protect the life or physical integrity of the person concerned or a third party.
- **In the event that the personal data processing activity is directly related to the establishment or performance of a contract,** the personal data processing activity will be carried out if it is necessary to process the personal data of the parties to a written or oral contract established between the person concerned and Avixa İlaç.
- **In the event that it is necessary to carry out personal data processing activities in order for the data controller to fulfill its legal obligation,** Avixa İlaç will process personal data in order to fulfill its legal obligations stipulated within the scope of the applicable legislation.
- **The fact that the relevant person has made his/her personal data public, the personal data disclosed to the public in any way by the relevant person, and the personal data that have been opened to the knowledge of everyone as a result of publicization, may be processed by Avixa İlaç without the explicit consent of the relevant person, limited to the purpose of publicization.**

- ***In the event that personal data processing is mandatory for the establishment, exercise or protection of a right***, Avixa İlaç may process personal data without the explicit consent of the person concerned.

- ***Provided that it does not harm the fundamental rights and freedoms of the data subject, if data processing is mandatory for the legitimate interests of the data controller***, personal data may be processed by Avixa İlaç, provided that the interests of the person concerned are taken into account. In this context, in the processing of data based on legitimate interest, the Company first determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the person concerned and carries out the processing activity if it is of the opinion that the balance is not disturbed.

2.3. Conditions Regarding the Processing of Sensitive Personal Data

In Article 6 of the Law, sensitive personal data is specified in a limited number. These are the data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, disguise and dress, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

Avixa İlaç processes sensitive personal data in accordance with the relevant legal regulations and by ensuring that additional measures are taken by the Personal Data Protection Board ("Board") in the following cases:

- ***The processing of sensitive personal data other than health and sexual life*** can be processed without seeking the explicit consent of the person concerned, if it is clearly stipulated in the laws, in other words, if there is an explicit provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the person concerned will be obtained in order to process the relevant sensitive personal data.

- ***Personal data related to health and sexual life*** may be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking explicit consent. Otherwise, the explicit consent of the person concerned will be obtained in order to process the personal data of such special nature.

In the event that Sensitive Personal Data is processed in a physical environment, the Company will ensure that adequate security measures are taken (against electricity leakage, fire, flood, theft, etc.) according to the nature of the environment in which the Sensitive Personal Data is located. By ensuring the physical security of these environments, it will prevent unauthorized entry and exit.

3. TRANSFER OF PERSONAL DATA

The Company may transfer Personal Data to a third natural or legal person located in the country and/or abroad in accordance with the KVK Regulations by taking the necessary measures for the purposes of Personal Data Processing. In this case, the Company ensures that the third parties to whom it transfers Personal Data also comply with this Policy. In this context, necessary protective regulations are added to the contracts concluded with the third party. The clause to be added to the contracts concluded with third parties to whom all kinds of Personal Data are transferred is obtained from the Data Controller Representative. Each employee is obliged to go through the process specified in this Policy in case of Personal Data transfer. In the article communicated by the Data Controller Representative, Personal

In the event that the third party to whom the data is transferred requests a change, the employee immediately notifies the Data Controller Representative.

- **Transfer of personal data to third parties in the country,** In the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the Law and described in this Policy, and provided that the basic principles regarding data processing conditions are complied with, personal data may be transferred to third parties in the country by Avixa İlaç.

- **Transfer of personal data to third parties abroad:**

If the country to which the transfer will be made is one of the safe countries with adequate protection declared by the Board; In the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the Law and described in this Policy, and provided that the basic principles regarding data processing conditions are complied with, your personal data may be transferred to third parties abroad by Avixa İlaç.

If the country to which the transfer is to be made is not one of the safe countries with adequate protection declared by the Board; Personal data may be transferred to third parties abroad in the presence of at least one of the data processing conditions described in this Policy and in accordance with the basic principles specified in Article 4 of the Law in the following cases:

- Presence of explicit consent of the person concerned
- The Company and the data recipient in the relevant country undertake adequate protection in writing and obtain the Board's permission for the relevant transfer

Within the scope of the general principles of the Law and the data processing conditions in Articles 8 and 9, Avixa İlaç may transfer data to the relevant parties when necessary during the data processing process. The parties to whom personal data is transferred and the purposes of transfer are explained in the clarification text presented specifically for the process. The Company's employees and the Data Controller Representative are jointly and severally responsible for ensuring that the transfer of Personal Data to third parties abroad complies with the KVK Regulations.

4. DISCLOSURE AND RIGHTS OF THE PERSON CONCERNED

According to Article 10 of the Law, before the processing of personal data or at the latest at the time of processing personal data, the person concerned must be informed about the processing of personal data. Pursuant to the relevant article, the necessary internal structure has been established to ensure that the relevant person is enlightened in every case where personal data processing activities are carried out by Avixa İlaç as the data controller.

You can submit your requests regarding your personal data within the scope of Article 11 of the Law on the Protection of Personal Data in writing in accordance with the "Communiqué on the Procedures and Principles of Application to the Data Controller" or to the addresses below by using your registered electronic mail (KEP) address, secure electronic signature, mobile signature or your e-mail address that you have previously notified to Avixa İlaç and registered in our system.

Data Controller: Avixa İlaç San. Ltd. Sti.

Email:

Kep Address:

Address: Avixa İlaç San. Ltd. Sti. - IOSB Mah. YTU İkitelli Technopark Sk. Yıldız Tek.Uni. T. Park 1/224Basaksehir/ISTANBUL

5. DELETION, DESTRUCTION, ANONYMIZATION OF PERSONAL DATA

In the event that the reasons requiring its processing disappear, although it has been processed in accordance with the law in accordance with Article 7 of the Law, in cases where a longer storage period is not determined by Avixa İlaç in accordance with the law, taking into account the sectoral practices regarding the storage of personal data, personal data are submitted ex officio or upon the request of the person concerned, per the guidelines published by the Personal Data Protection Authority, periodic destruction periods and the application of the person concerned, and are deleted, destroyed or anonymized by Avixa İlaç as appropriate.