

Long Hair Center Hair Transplant Center, in its capacity as a data controller under Law No. 6698 and sub-laws on the Protection of Personal Data ("Law"), we also attach great importance to the protection of your data following the General Data Protection Regulation (GDPR). To inform you about the sources from which we obtain your data, the legal grounds on which we obtain and process personal data, the purposes for which we process your data, whether we disclose personal data and to whom we disclose it, and to inform you of your legal rights, this Clarification Text on the processing and protection of Personal Data ("Text") has been prepared.

Long Hair Center processes your data following the law, prevents unlawful processing of and access to your data and has adopted all necessary technical and administrative measures to ensure the most adequate level of security to guarantee the protection of personal information.

PERSONS WE PROCESS DATA

Long Hair Center, as data controller, processes personal data limited to the following categories of individuals.

- Our Employees,
- Our employee candidates (including references provided by applicants).
- Our interns and on-the- Job Trainees,
- Our Patients,
- Individuals who are interviewed and contacted to make a diagnosis, receive treatment, or receiving such services,
- relatives and companions of patients,
- Persons involved in commercial activities, or persons with whom we are or will be associated as a result of commercial activities, or representatives or employees of companies (supplies, advertising, support, marketing, accommodations, transportation, reference resources, etc.)
- Our legal advisers, solicitors, and consultants or authorized persons or employees of consultancy firms,
- Visitors
- Legal representatives, parents, guardians, or custodians of a data subject
- Persons involved in legal proceedings and their legal representatives
- Third parties with whom we have been in contact, although they have no business or legal relationship with our company.

PERSONAL DATA WE PROCESS

As a data controller, Long Hair Center processes the following personal health data, general and special personal data following the principles of "lawfulness", "necessity", "required for a specific purpose" and "limitation".

Identity Data

Name, surname, nationality, T.R. of the persons whose data are processed. Identity number, passport number and information if they are not Turkish citizens, or any identity-related data such as TR temporary identity number, place and date of birth, marital status, gender information.

Communication Data

This is all communication-related data such as residence address, mobile phone number, email address.

Visual and Audio Data

The visual and audio recordings are recorded by the company's security cameras, the audio recordings stored when you contact our call center, the confirmation and proof of advertising, research, medical or aesthetic-cosmetic procedures with express written consent and authorization. Personal data recorded by photographic or video recordings for convincing medical treatment of the candidates are the data in this section.

Comment and Complaint Data

It is the data of comments and complaints transmitted to our company by consent and agreement through the website or other channels to evaluate the services we offer.

Address or Location Data

This is address or location data that individuals transmit by any means and with their consent.

Transaction Security Data (IP data and cookies).

This includes IP address, browser information, website login and password information (Mac ID, IP address information, website login and password information).

Legal Data

It is all the data and enforcement data regarding the persons being the plaintiff or the defendant. It is the data about the employees working in the company and any person who has a lawsuit or enforcement proceeding with the company.

Financial Data

It is the data of individuals such as bank account number and IBAN. It is the data requested and processed in terms of employees working in the company and patients receiving service from the company.

Health Data

All types of health data collected in the provision of medical diagnostic, treatment and care services, such as laboratory and imaging results, medical test results, blood group, examination data, prescription information that must be kept in medical records for legal reasons, are processed with the consent of the data subject. In addition, the health report and other medical documents in the employee's file also fall within this scope.

Vehicle Number Plate data

If a company-owned parking lot or private valet is used, the license plates belong in this section.

Customer Transaction Data

Call center records, invoices, promissory notes, checks, cash receipts, order information, requisition information, etc.

Fashion Data

Clothing data, size data, etc., uniforms, material, shoe size, etc. fall within this scope.

Biometric data

Data such as palm information, fingerprints, retina scans, facial recognition, etc. fall within this scope.

Risk Management Data

Data processed for the management of commercial, technical and administrative risks fall within this scope.

Physical Space Security

Data in this scope includes information on the entry and exit registration of employees and visitors, as well as security camera footage.

III. PROCESSING PERSONAL DATA

A. OBTAINING PERSONAL DATA

1. Through Which Channels and How Personal Data are Collected

Your Personal Data;

- 1.2. as a result of the meeting with our call center,
- 1.3. as a result of the conversation conducted through the live support application on our website,
- 1.4. as a result of a conversation with Long Hair Center doctors or relevant staff via phone, WhatsApp application or email,
- 1.5. by the Long Hair Center's marketing and advertising professionals via phone, SMS or WhatsApp, etc. As a result of communication via the above applications,
- 1.6. When you contact Long Hair Center, you can contact the doctors or the relevant staff by phone, SMS or WhatsApp, etc. As a result of the conversations, you will make about the applications,
- 1.7. when you apply to the Long Hair Center, as a result of face-to-face meetings with doctors or relevant staff,
- 1.8. personal data of persons and officials or employees of the Company with whom business relations are established in the course of business, on the contract documents and other documents of a business, on the communication platforms,

- 1.9. as a result of the inclusion of personal data in the contractual and other business documents of our Legal Advisors, lawyers and consultants or agents or employees of consulting companies, on communication platforms,
- 1.10. as a result of requests made through buttons such as "Contact Us" or "Obtain Information", and as a result of advertisements and notices on social media,
- 1.11. as a result of requesting a mobile phone number for the personal data and encryption required by the legislation for the connection to the transmission in the wireless network (Wi-Fi) specifically for the guests within the wireless Internet service,
- 1.12. Obtaining data in the form of the record of MAC ID (Device Identity Information) from the logins on the website,
- 1.13. When we contact Long Hair Center, although there is no commercial or legal connection, or when we are contacted, personal data of third parties are included in the communication platforms,
- 1.14. Similarly, with other legal channels of data collection,

It is obtained through such channels.

B. PURPOSE OF PROCESSING PERSONAL DATA AND LEGAL REASONS

1. Purposes of collection and processing of personal data.

Your data mentioned above and your data of a special nature will be processed for the following purposes.

- 1-Fulfill legal obligations and conduct all types of business within the legal framework,
- 2-Fulfillment the provisions of the contract,
- 3-Providing Health Services (carrying out medical or medical-cosmetic diagnoses, analysis, treatments and care services of all kinds).
- 4-Commercial activity and management requirements,
- 5-Requirements of the sector (health);
 - 5.1. protection of public health, preventive medicine, medical diagnosis, treatment and care services, whether ill or not,
 - 5.2. Sharing of information requested by the Ministry of Health and all other relevant official institutions and organizations, following health legislation,
 - 5.3. financing the cost of health services, examinations, diagnoses and treatments through the departments of patient services, financial affairs and marketing,
 - 5.4. informing patients about the appointment through the customer service representative, call centers and other channels,
 - 5.5. patient services, identity confirmation through other departments,
 - 5.6. measuring, increasing and researching patient satisfaction via Hospital Management, Patient Rights and Patient Experience Departments,
 - 5.7. billing via Patient Services, finance, Marketing Departments,

- 5.8. Answering all kinds of questions and complaints about our health services via Hospital Management, Patient Rights and call centers, Patient Relations Department,
- 6. Technical requirements;
 - 6.1. planning and management of the internal functioning of the facility by the call center, patient care, hospital management,
 - 6.2. quality of service delivery, patient experience, research and analysis by the departments IT to improve the quality of health services,
 - 6.3. training of staff by the departments of human resource management and quality,
 - 6.4. Monitoring and prevention of abuse or unauthorized transactions by the departments Internal Audit and Data Processing Department,
 - 6.5. Implementation of risk management and quality improvement measures by the departments Quality and Information Technology,
 - 6.6. Taking all necessary technical and administrative measures within the framework of data security by the department's Hospital Management and IT,
 - 6.7. provision of the necessary communication by officials to carry out transport, accommodation and care services in the context of health tourism,
 - 6.8. participation in campaigns and provision of campaign information via Patient Relations Department, marketing, call centers, design of special content, tangible and intangible benefits on the Internet and other mobile channels, social media and exchanges with interlocutors,
 - 6.9. conducting training and activities through the educational institutions with which the institution cooperates,

2. Legal Reasons For The Collection And Processing Of Personal Data

Your data mentioned above and your data of special nature;

- Basic Law on Public Health No. 3359,
- Decree-Law No. 663 on the organization and functions of the Ministry of Health and its associated agencies,
- Personal Data Protection Act No. 6698,
- Private Hospitals Regulation,
- Decree on the processing of Personal Health Data and the Protection of Privacy,
- Law on identity reporting No. 1774,
- Labor Law No. 4857
- Social Insurance and General Health Insurance Act No. 5510,

It will be processed for legal reasons.

According to Article 6(3) of the Personal Data Protection Act No. 6698, personal data related to health and sexual life may only be used for the protection of public health protection, prevention, medical diagnosis, treatment and care services, planning and management of health services and financing. May be processed by persons or authorized bodies and organizations bound to secrecy without obtaining the explicit consent of the data subject.

C. TRANSFER OF PERSONAL DATA

Your data,

- Basic Law on Public Health No. 3359,
- Decree-Law No. 663 on the organization and functions of the Ministry of Health and its associated agencies,
- Personal Data Protection Law No. 6698,
- Private Hospitals Regulation,
- Decree on the processing of Personal Health Data and the Protection of Privacy,
- Law on identity reporting No. 1774,
- Labor Law No. 4857
- Social Insurance and General Health Insurance Law No. 5510,

Within the scope of its provisions and for the purposes described above;

- Ministry of Health, subunits and family medicine centers affiliated with the Ministry,
- Private insurance companies (health, pension, life insurance, etc.),
- Social Security Institution,
- Ministry of Family, Labor and Social Policies,
- Directorate General of Security and Other Law Enforcement Agencies,
- General Directorate of Population and Citizenship Affairs,
- Other authorized official institutions and organizations,
- Turkish Pharmacists Association,
- Judicial authorities, enforcement offices, mediators,
- Laboratories, medical centers, outpatient clinics, medical institutions and institutions that provide health services in the country or abroad and with which we cooperate in medical diagnosis and treatment,
- The health care institution to which the patient has been referred or to which the patient has self-referred,
- The legal representatives, parents and guardians with a written power of attorney
- Natural or legal third parties who receive consulting services, including lawyers, tax advisors and auditors with whom we contractually cooperate,
- Regulatory and supervisory institutions and official authorities,
- Companies within the group to which our hospital belongs,

- Banks with which our company or those of our patients or employees contractually associated with our company maintain accounts,
- Private pension providers operating under the statutory or voluntary IPS (Individual Pension System),
- Our suppliers, support service providers, record service providers and business associates whose services we use or with whom we work (more information is available upon written request to our hospital).
- To our business associates and business contacts,
- To our shareholders and persons or entities with whom discussions with shareholders have taken place.
- Outsourcing service providers,
- Freight or courier companies
- Passenger air, land or sea transportation companies,

It can be shared with.

IV. OUR MEASURES AND OBLIGATIONS ON THE PROTECTION OF THE PERSONAL DATA

Long Hair Center as data controller protects your personal and private data mentioned above in physical and electronic environments with great sensitivity and full compliance with the law, adopting all kinds of administrative and technical measures

Long Hair Center has taken all possible administrative and technical measures to protect your data as it is stored in VERBIS and contained in the Personal Data Inventory.

Long Hair Center is committed to protecting all personal data. To prevent unlawful processing and access to personal data and to ensure the protection of personal data, technical and administrative measures are implemented using various methods and security technologies to ensure an adequate level of security.

The Long Hair Center will not disclose the personal data received to third parties, in violation of the provisions of Law No. 6698 on the protection of personal data, and will not use them for purposes other than processing.

The Long Hair Center has prepared and signed all warnings or consent forms, undertakings and has carried out the necessary multi-level verification measures in cases where the disclosure (transfer) of personal data to outsourcing service providers and suppliers, consultants or lawyers is necessary.

V. PROCESSING FROM PERSONAL DATA COLLECTED TO COOKIES.

Long Hair Center does not set cookies on its website. While using our website and mobile application, IP address, browser information (Mac ID, IP

address information, website login and password information) are not received.

VI. YOUR RIGHTS REGARDING OF PROTECTION OF PERSONAL DATA.

According to Article 11 of Personal Data Protection Law, you may exercise your rights about the processing and protection of your data, provided that you can prove your identity by registering with Long Hair Center as a Data Controller.

A. YOUR RIGHTS REGARDING YOUR DATA.

- 1. To know whether or not your data is being processed,
- 2. If your data have been processed, to request information about it,
- 3. To know the purposes for which your data are processed and whether they are used for the purposes for which they are intended,
- 4. To know to which third parties, both domestic and foreign, your data are disclosed,
- 5. To request the rectification of incomplete or inaccurately processed personal data
- 6. To request the deletion or destruction of personal data,
- 7. to request the rectification and erasure or destruction of your data if they have been disclosed to third parties, if your data have been processed incompletely or inaccurately, to inform the third party concerned or to notify him/her thereof
- 8. to oppose the identification of your data through the analysis of data processed exclusively with automated systems
- 9. to claim compensation in the event of damage caused by the unlawful processing of personal data,

You have rights.

You may request the destruction (deletion, destruction or anonymization) of your data from Long Hair Center under the conditions of Article 7 of Personal Data Protection Law. However, the appropriate method will be assessed by our company depending on the circumstances of each case when evaluating your request for destruction. In this regard, you may at any time request information from Long Hair Center as to why we have chosen the destruction method we have chosen.

The personal data of persons under 18 years of age is limited to surname, first name, age and degree of relationship and can only be communicated to us by the relevant adults (parents or guardians).

SITUATIONS OUT OF THE SCOPE OF APPLICATION

According to Article 28 of Personal Data Protection Law, personal data holders cannot exercise their right to apply because the following cases are excluded from the scope of the PDP Law:

- Processing of personal data for purposes such as research, planning and statistics through anonymization with official statistics.
- Processing of personal data for purposes of art, history, literature or science or in the context of freedom of expression, unless it is contrary to national defense, national security, public safety, public order, economic security, privacy or personal rights or constitutes a criminal offense.
- Processing of personal data in the context of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or law enforcement authorities in the framework of the investigation, prosecution, judicial or enforcement proceedings.

Following Article 28(2) of the Law on the Protection of Personal Data, it is not possible to exercise the rights in the following cases, except for the right to compensation:

- The processing of the personal data is necessary for the prevention of crime or criminal investigations,
- The processing of personal data has been made public by the data subject,
- The processing of personal data is necessary for the performance of supervisory or regulatory tasks and disciplinary investigations or prosecutions by authorized and empowered public bodies and organizations and professional associations of a public character, based on the powers conferred by law,
- the processing of personal data is necessary for the protection of the economic and financial interests of the State concerning budgetary, fiscal and financial matters.

B. YOUR WAYS TO CONTACT OUR COMPANY TO USE YOUR RIGHTS

Your rights under the Personal Data Protection Law;

- 1- By filling out the form Application Form about the protection of Personal Data on our company's website at "www.longhaircenter.com",
- 2- By coming to Ataköy 7-8-9-10 Section E5 side road NEF-22 F Block Flat:167 Bakırköy/İstanbul where our company's headquarters is located, filling in the Application Form on the Protection of Personal Data to be obtained from the Human Resources Management department and handing it in person against signature,

- 3-By sending a letter through the notary,
- 4- By sending an email to info@longhaircenter.com with a secure electronic or mobile signature to the registered email address

You can use it.

Depending on the nature of your request and your application method, the Company may require additional verifications (e.g., sending a message to your registered phone number, calling you) to determine whether or not the application belongs to you to protect your rights. For example, if you apply through your email address registered with the Company, you may be contacted through another method of communication registered with the Company and asked to confirm that the application belongs to you.

As a rule, depending on the nature of the request, your requests will be processed free of charge within thirty working days at the latest. However, if the transaction requires a separate fee for the company, as stated in the Communiqué on the procedures and guidelines for the request on the website Data Controller, published in Official Gazette on 10.03.2018 and under the number 30356 of Personal Data Protection Authority, an amount of 50 (Fifty) TL cannot be exceeded. A fee may be charged. If your request is due to the fault of our company, the Data Controller, the fee paid will be refunded.

Your proper requests for protection from Personal Data will generally be processed free of charge within thirty business days of their receipt by our company.

To confirm that you are the correct person in the case of your application, "Long Hair Center" has the right to request some confirmatory information from you. Unless you withdraw your application, you will be deemed to have accepted these requests from Long Hair Center.

CONSENT and APPROVAL

By reading this Clarification Text, you accept, declare and undertake that you are fully and comprehensively informed that LONG HAIR CENTER carries out data processing in this context and that you have been informed about and have consented to the processing of your data.