**CLARIFICATION TEXT**

As NTA Implant Industry and Trade Ltd. Co.(“Company”), safety and protection of the personal data is within our utmost care. In accordance with The Law on the Protection of Personal Data numbered 6698, the following declarations are related to all third parties; in case you get a service from us, you work with us, or within the scope of the legal relationship between us, and if you visit our website. The company holds the right of update and change of the Law on the Protection of Personal Data clarification text depending on the current legislation framework.

According to published Law on the Protection of Personal Data on 07.04.2016 dated and 29677 numbered Official Gazette of the Republic of Turkey, personal data means all types of information which may define your identity define or make it definable. Your personal data, processed by companies within NTA Implant network as controllers, and processing purposes, recipient groups, collection method, legal backgrounds of your personal data and your rights with respect to such personal data and the contact information in terms of using your rights are below.

**DEFINITIONS**

Explicit Consent: Consent on a particular subject, based on information and freely expressed, giving permission and authority to the addressee on the permitted subject.

Personal Data: All types of information which may define your identity define or make it definable

Sensitive Personal Data: Data about race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership to associations, foundations, or unions. Indicators of health, sexual life, criminal convictions and security measures, and biometric and genetic data.

The KVK Law: The Law on the Protection of Personal Data numbered 6698.

Board of KVK: The board of the Law on the Protection of Personal Data numbered 6698.

Processing Personal Data: Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or blocking by using personal data completely or partially by automatic or non-automatic means and any other operations that can be performed on the data.

**DATA** **CATEGORIZATION**

ID: Name and surname, Mother - father's name, Mother's maiden name, Date of birth, Place of birth, Marital status, ID serial number, ID number etc.

Contact: Address no, E-mail address, Contact address, Registered e-mail address (KEP), Telephone no. etc.

Personnel Information: Payroll information, Disciplinary investigation, Recruitment document records, Property declaration information, CV information, Performance evaluation reports, etc.

Legal Transactions: Information in correspondence with judicial authorities, Information about a case file, etc.

Customer Operations: Call center records, Invoice, Promissory Note, Check information, Information on box office receipts, Order information, Request information, etc.

Physical Space Security: Entry and exit registration information of employees and visitors, Camera recordings, etc.

Finance:Balance sheet information, Financial performance information, Credit and risk information, Asset information etc.

Work Experience: Diploma information, Courses attended, In-service training information, Certificates, Transcript information, etc.

Visual and Audio Recordings: Visual and Audio recordings etc.

Health Information: Information on disability status, Blood group information, Personal health information, Device and prosthesis information used, etc.

Biometric Data: Palm information, Fingerprint information, Retina scan information, Face recognition information etc.

**IDENTITY OF DATA CONTROLLER**

NTA Implant Industry and Trade Ltd. Co. is the “Data Controller” of the data which is collected by the Company according to the The Law on the Protection of Personal Data. The contact information of the Company can be found in the below.

**Address:** Tahılpazarı Mh. İsmetpaşa Cd. Zeynep Ertuğrul Apt. No:43/3 Muratpaşa/ANTALYA

**Phone :** 0 242 248 19 96

**E-Mail :** [info@ntaimplant.com](mailto:info@ntaimplant.com)

**KEP :** ntaimplant@hs01.kep.tr

**COLLECTION, PROCESSING AND PROCESSING PURPOSE OF PERSONAL DATA**

Your personal data which is collected may vary depending on the employment, service policy, or commercial activities provided by our Company. The personal data can be collected verbally, in writing or electronically, through automatic or non-automatic methods, through our Company's units and offices, Group Companies, website, social media channels, mobile applications and similar means.

For the purposes of determining and implementing our company's commercial and business strategies and ensuring the execution of our company's human resources policies, in line with the following matters, personal data can be processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law on the Protection of Personal Data No. 6698, can be transferred and to third party customers in order to carry out its purpose and subject.

In order to ensure security within the company;

* Ensuring the physical security of the workplace,
* Controlling the entrances and exits of the company headquarters, due to the necessity arising from the execution of the customer contracts,
* Making the right/unjust distinction of the customer in customer complaints, increasing customer satisfaction, understanding customer needs, and improving customer-related processes,
* Evaluating the service quality and training the staff,
* Establishing business relations within the framework of the business subject, conducting the service process, issuing policies,
* Follow-up and execution of communication processes with official institutions,
* Fulfilling legal obligations in accordance with employment contracts,
* Informing about the changes in the contracts,
* Conducting market research, planning, and organizing activities to ensure or increase loyalty to products and services,
* Performing all kinds of accounting transactions, including invoicing related to sales,
* Planning, auditing, and execution of information security processes,
* Providing e-mail to respond to customer requests,
* Making manual and online money collection and recording the payments, performing invoice cancellation and refund transactions,
* Registration of the customer in the systems and opening the current card,
* Conducting customer visits, participating in meetings with customers, informing customers on technical issues.

**TO WHOM AND FOR WHAT PURPOSES THE PROCESSED PERSONAL DATA MAY BE TRANSFERRED**

Your collected personal data: within the scope of the purposes explained in detail in article 4 of this Clarification Text, can be transferred to;

Our Company's relevant units, departments, other personnel, managers, shareholders, members of the board of directors, Company suppliers that the personnel are planned to work with, legally authorized public institutions and private individuals,

Courts and enforcement directorates, service provider companies and their officials and IT companies for the purpose of ensuring the record security and storage of documents,

Company customers and officials for whom the personnel are responsible or who are required to stay in contact due to necessity even if they are not responsible,

Insurance companies and officials with whom the Company has legal relations,

Telecommunication companies and its officials that we work with for the purpose of laying lines to personnel and telephone delivery,

And your credit card information to banks for the purposes of money collection, invoice cancellation and refund, personal data specified in Articles 8 and 9 of the Law on Protection of Personal Data No. 6698. within the framework of processing conditions and purposes.

**LEGAL GROUNDS FOR COLLECTION OF PERSONAL DATA AND COLLECTION METHOD**

Your personal data is obtained in all kinds of verbal, card system, written or electronic media, in order to carry out the business in line with the above-mentioned purposes and to fulfill the contractual and legal responsibilities of our Company completely and accurately. In accordance with the legitimate interest of the Company to ensure its security, your visual data can be obtained through the cameras and audio recorders we place in the Company. Your personal data collected for this legal reason can be processed and transferred by automatic or non-automatic methods for the purposes specified in Articles 3 and 4 of this text, within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law on the Protection of Personal Data No. 6698.

**STORAGE PERIOD OF PERSONAL DATA**

The storage period of your personal data is as follows;

If a period is determined for the storage of data in the law or the relevant legislation, the mentioned data must be kept for at least this period.

The storage period is determined by adding a period of 6 months to 1 year to the periods stipulated in the legislation for the storage of your data, considering the possibility that a possible court request or a request of an administrative authority authorized by law regarding the relevant data arrives late to us or a conflict that we may be a party to occurs. At the end of the period, the data in question is deleted, destroyed, or anonymized.

If the legislation does not foresee a period for the storage period of the data we process, it is stored for the required period of time as a requirement of the relationship between us. After the end of the aforementioned relationship or after the period specified in the contract, your data will be deleted, destroyed or anonymized without your request.

If you request the deletion or destruction of your data, the retention period of which is determined in the legislation, before the stipulated periods, your request will not be fulfilled. In cases where a certain period is not stipulated in the legislation regarding the retention period of personal data, if you request the deletion or destruction of your personal data, your data will be deleted, destroyed, or anonymized on the first periodic destruction date and within 6 months at the latest.

**YOUR RIGHTS IN TERMS OF PROTECTING YOUR PERSONAL DATA**

Pursuant to Article 11 of the Law, whether or not you have a Statement of Explicit Consent; By applying to our company, you can exercise your existing rights in the following matters regarding your personal data (Primarily, Articles 5-6 of the KVK Law and related regulations, as well as the regulations and rights regarding data processing in other legal regulations).

In this context, as personal data owners has the following;

• Learning whether personal data is processed or not,

• If personal data has been processed, requesting information about it,

• To learn the purpose of processing personal data and whether they are used in accordance with the purpose,

• Knowing the third parties to whom personal data is transferred in the country or abroad,

• Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,

• Requesting the deletion or destruction of personal data in the event that the reasons requiring it to be processed disappear, despite the fact that it has been processed in accordance with the Law on the Protection of Personal Data No. 6698 and other relevant laws, and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,

• Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,

• Requesting the compensation of the damage in case of loss due to unlawful processing of personal data,

rights.

In accordance with your legal rights stipulated in the relevant law and various legislation, you can personally submit your requests to our address above with a petition or send them through a notary public. In addition, in accordance with the 5th article of the "Communiqué on Application Procedures and Principles to the Data Controller", you can use the registered e-mail (KEP) address, secure electronic signature, mobile signature or the e-mail address you have previously notified to our Company and registered in our systems. You can forward it to [info@ntaimplant.com](mailto:info@ntaimplant.com).

The application made by following the above-mentioned procedure will be answered free of charge within a maximum of 30 days. In cases where the request is rejected, the response given is insufficient, or the application is not answered in due time; you have the right to make a complaint to the KVK Board within 30 (thirty) days following the notification of the answer to you, and probably within 60 (sixty) days from the date of application. However, in accordance with the legislation, it is not possible to apply for a complaint without exhausting the remedy.