

COOKIE PRIVACY NOTICE

Pursuant to Law No. 6698 on the Protection of Personal Data (the “Law”), Moment Eğitim Araştırma Sağlık Hizmetleri ve Ticaret Anonim Şirketi (“American Medical Center” or the “Institution”), acting in the capacity of data controller, makes use of certain technologies such as cookies, pixels and GIFs (collectively, “cookies”) in order to enhance your experience during your use of, or visit to, our websites (the “Site”) or any similar online or offline channels made available to you in the digital environment (all such channels being collectively referred to as the “Platform”). These technologies are used in compliance with the legislation to which we are subject, and in particular with the Law.

1. Identity of the Data Controller

Company Name	Moment Eğitim Araştırma Sağlık Hizmetleri ve Ticaret Anonim Şirketi
MERSIS Number	0068078344100012
Address	Bağdat Caddesi No. 130, Feneryolu, 34724 Kadıköy, İstanbul, Türkiye
Telephone	0 216 468 2 555
E-mail	kisiselveri@amerikanhastanesi.org
Registered Electronic Mail (KEP) Address	momentegitimarastirma@hs02.kep.tr

2. What Is a Cookie?

A cookie is a small piece of data sent by a website to your browser and stored on your computer. This data is retained through your browser for a specified period of time and may be used when you interact with the website again. Cookies are used for the purposes of enhancing the user experience and optimising website services.

The purpose of this Cookie Privacy Notice is to provide you with information regarding the processing of personal data obtained through the collection of personal data by means of cookies, pixels and similar technologies used during your use of the Platforms. In this notice, we wish to explain to you the types of cookies we use on our site and our application, the purposes for which they are used, and how you may control such cookies.

We may discontinue the use of the cookies employed on our site and our application, amend their types or functions, or add new cookies to our site and our application. Accordingly, we reserve the right to amend the provisions of this Cookie Privacy Notice at any time. Any amendment made to the current Cookie Privacy Notice shall take effect upon its publication on the site, the application or any publicly accessible channel.

3. For What Purposes Are Cookies Used?

As the Institution, we use cookies on our site and our application for various purposes and process your personal data by means of such cookies. These purposes are principally as follows:

- **To perform the basic functions necessary for the operation of the Site and the application.** For example, ensuring that members who have logged in are not required to re-enter their password when visiting different pages of the Site.

- **To analyse the Site and the application and to enhance the performance of the Site and the application.** For example, the integration of the different servers on which the Site operates, the determination of the number of visitors to the Site and the adjustment of performance settings accordingly, or facilitating visitors in finding what they are looking for.
- **To enhance the functionality of the Site and the application and to provide ease of use.** For example, sharing content on third-party social media channels via the Site, or remembering a visitor's username or search queries on a subsequent visit.
- **To carry out personalisation, targeting and advertising activities.** For example, displaying advertisements connected with visitors' areas of interest on the basis of the pages and products they have viewed.

4. Method of Collection of Personal Data and Legal Ground

Your personal data is collected electronically by means of cookies, as a result of your visit to our website or your use of our services, on the legal ground of the legitimate interests of our Institution, in accordance with Article 5/2-(f) of the Law, which provides that "processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject". Analytics cookies intended to analyse user behaviour and marketing cookies intended for targeting and profiling may be used only where your explicit consent has been obtained. The personal data collected may also be processed for the purposes set out in the "Description" column of the tables below, in accordance with Article 5 of the Law.

5. To Whom and For What Purposes Personal Data May Be Transferred

Your personal data falling within the scope of this Cookie Privacy Notice may be transferred to our suppliers, to public institutions legally authorised and to private persons legally authorised, limited to the fulfilment of the purposes set out above and in compliance with the applicable legislation, within the scope of the data processing conditions set out in Article 5 of the Law and in accordance with the rules governing the transfer of personal data set out in Article 8 of the Law.

6. Cookies Used on Our Site

Set out below are the different types of cookies used on our site and our application. Both first-party cookies (placed by the site you visit) and third-party cookies (placed by servers other than the site you visit) are used on our site and our application.

a. Strictly Necessary Cookies

The use of certain cookies is mandatory for the proper functioning of our site and our application. For example, the authentication cookies that are activated when you log in to our site ensure that your active session is maintained as you move from one page of our site to another.

Cookie	Provider	Description	Duration
TS015acd4e	The Institution	The BIG-IP ASM system validates these cookies returned from clients in order to ensure that the cookies set out in the security policy have not been modified.	Session
TS01b0667e	The Institution	The BIG-IP ASM system validates these cookies returned from clients in order to ensure that the cookies set out in the security policy have not been modified.	Session

Cookie	Provider	Description	Duration
CMSLandingPageLoaded	The Institution	This cookie is set by the Content Management System (CMS) and retains information specific to the landing screen, such as loading time.	Session
CMSUserPage	The Institution	This cookie is set by the Content Management System (CMS) and retains user page information.	Session
FPLC	The Institution	FPLC is a hash of the FPID cookie and is not HttpOnly, which means that JavaScript can access FPLC and use it for cross-domain tracking.	20 hours
FPID	The Institution	This cookie is designated as FPID (First-Party Identifier) by default. The value stored in FPID is used to set the Client ID in the request sent to Google's servers.	1 year
ASP.NET_SessionId	The Institution	ASP.NET_SessionId is a cookie used to identify the user session on the server. The session is an area on the server in which data may be stored between HTTP requests.	Session
CMSCsrCookie	The Institution	Stores a security token used by the system to validate all form data submitted through POST requests. It assists in protecting against cross-site request forgery.	Session
CMSPreferredCulture	The Institution	This cookie is set by the Content Management System (CMS) and retains preferred region or language information.	Session

b. Analytics Cookies

These cookies enable us to analyse your use of our site and our application and to carry out performance analysis, and thereby to improve the services we provide to you. For example, by means of these cookies we are able to determine which pages our visitors view most frequently, the duration of their visits, whether our site is operating as it should and any potential problems.

Cookie	Provider	Description	Duration
_clsk	The Institution	Stores data relating to the time spent on the website and its sub-pages during the current session.	24 hours
_ga_DWDYHN27M7	The Institution	Used by Google Analytics to retain user-specific statistical data.	1 year
_ga	The Institution	Registers a unique identifier used to generate statistical data on how the visitor uses the website.	1 year
_clk	The Institution	Collects data on the user's navigation of, and behaviour on, the website. This is used to compile statistical reports and heat maps for the website owner.	365 days
_gat_UA-12938141-1	The Institution	Used by Google Analytics to throttle the request rate.	Session
_gid	The Institution	Registers the unique identifier used to generate statistical data on how the visitor uses the website.	24 hours
FPGSID	The Institution	Records statistical data relating to users' behaviour on the website. Used by the website operator for internal analysis.	25 minutes
_gtmecn	The Institution	This cookie is set by Google Tag Manager within the scope of Event Enhancement. It is a secure cookie accessible only over HTTP and is used to enrich event data, improve event match quality and enable conversions to be attributed more accurately to marketing campaigns.	90 days

c. Marketing Cookies

These cookies may be placed through our site by our advertising partners. They may be used and shared by such companies for the purpose of building a profile of your areas of interest and displaying to you relevant advertisements on other sites. This process is based on the unique identification of your browser and internet device. Should you not permit these cookies, you will be exposed to less targeted advertising.

Cookie	Provider	Description	Duration
AVPUID	imagazine.advertserve.com	Used to identify the visitor across visits and devices. This enables the website to serve relevant advertising to the visitor. The service is provided by third-party advertising hubs that facilitate real-time bidding for advertisers.	9 hours
fr	Facebook	Used by Facebook to deliver a range of advertising products, such as real-time bidding from third-party advertisers.	2 hours
sp_landing	Spotify	This cookie is set by the cookie provider Spotify. It is used to implement audio content from Spotify on the website. It also assists in collecting information on user interaction with such audio content.	1 minute
sp_t	Spotify	This cookie is set by the cookie provider Spotify. It is used to implement audio content from Spotify on the website. It also assists in collecting information on user interaction with such audio content.	9 hours
IDE	DoubleClick	Used by DoubleClick to record and report the actions of the website user following the display of, or a click on, one of the advertiser's advertisements, for the purpose of measuring the effectiveness of an advertisement and serving the most appropriate retargeted advertisements to the user.	10 hours
ANONCHK	Clarity	Records data relating to visitors across multiple visits and multiple websites. This information is used to measure the effectiveness of advertisements on websites.	Session
MR	Clarity	This cookie is used to track visitors across websites. The purpose is to display advertisements that are relevant and engaging for the individual user and therefore of greater value to publishers and third-party advertisers.	10 minutes
MUID	Clarity	This cookie enables visitors to leave comments on their use of the website. This information is used to optimise the website.	9 hours
SM	Clarity	Registers a unique identifier that identifies the user's device on repeat visits across websites using the same advertising network. The identifier is used to enable targeted advertising.	Session
SRM_B	Bing	Tracks the user's interaction with the search bar function of the website. This data may be used to present relevant products or services to the user.	9 hours
MR	Bing	This cookie is used to track visitors across websites. The purpose is to display advertisements that are relevant and engaging for the individual user and therefore of greater value to publishers and third-party advertisers.	10 minutes
MUID	Clarity	This cookie enables visitors to leave comments on their use of the website. This information is used to optimise the website.	9 hours
CLID	The Institution	Collects data on the user's navigation of, and behaviour on, the website. This is used to compile statistical reports and heat maps for the website owner.	9 hours
VisitorStatus	The Institution	This cookie is set automatically by our Content Management System (CMS). It records the general status of the visitor for the purpose of tracking site visitors in web analytics.	Session

Cookie	Provider	Description	Duration
_gcl_au	The Institution	Conversion tracking cookie for Google Conversion Linker (Ads/Analytics).	90 days
_fbp	The Institution	Used by Facebook to deliver a range of advertising products, such as real-time bidding from third-party advertisers.	90 days

7. How Can I Control the Use of Cookies?

The preferences of our visitors and users regarding the use of cookies and similar technologies are of fundamental importance to us. Notwithstanding this, the use of Cookies that are mandatory for the operation of the Platform is necessary. In addition, we would remind you that, should certain cookies be disabled, some functions of the Platform may cease to operate in whole or in part.

Where you click the “I accept all cookies” button on the information notice presented to you regarding the use of cookies at the moment you first visit our site, you will thereby have consented to all cookies on our website. Where you click the “Reject” button, you will thereby have rejected those cookies on our website that are subject to user consent, other than the necessary cookies. Where you click the “Cookie Settings” button, you may determine the types of cookies in accordance with your preference. You may withdraw your consent at any time and amend your cookie settings by clicking on the “Manage Your Cookie Settings” heading located in the footer.

8. What Are Your Rights as a Data Subject under Article 11 of the Law?

As a Data Subject, you may at any time submit your requests under Article 11 of the Law in respect of the personal data processed by us to the addresses set out below, in writing or by using a registered electronic mail (KEP) address, a secure electronic signature, a mobile signature or the electronic mail address that you have previously notified to us and that is registered in our system, in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller. If you so wish, you may also submit your applications to our Institution by completing the Data Subject Application Form accessible at <https://www.amerikanhastanesi.org/amerikan-tip-merkezi/kisisel-verilerin-korunmasi>.

E-mail	kisiselveri@amerikanhastanesi.org
Registered Electronic Mail (KEP) Address	momentegitimarastirma@hs02.kep.tr
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