

**VEHBİ KOÇ FOUNDATION HEALTHCARE ORGANIZATIONS
PROTECTION AND PROCESSING OF PERSONAL DATA
PATIENT PRIVACY NOTICE**

1) Data Controller

Your personal data is processed by Moment Eğitim Araştırma Sağlık Hizmetleri ve Ticaret Anonim Şirketi (“**American Hospital**”) and Halikarnas Özel Sağlık Hizmetleri ve Sağlık Malzemeleri Sanayi ve Ticaret Anonim Şirketi (“**Bodrum American Hospital**”) and Koç University Hospital, the economic institution of Koç University (“**Koç University Hospital**”),(hereinafter referred together as the “**Institutions**” and separately as the “**Institution**”) as the data controller in accordance with the Personal Data Protection Law No. 6698 (“**Law**”) within the scope as specified below. The Institution which the physician or the specialist who provides the service is affiliated shall act as the data controller.

You may find detailed information on the purposes of processing your personal data by the Institution at the Personal Data Protection and Processing Policy (“**Policy**”) available at the <https://www.amerikanhastanesi.org/protection-of-personal-data> website.

2) Purposes for Processing Personal Data

In accordance with the conditions for processing personal data specified under Articles 5 and 6 of the Law, your collected personal data shall be processed within the scope of conducting the necessary activities by our business units in order to provide you the products and services offered by our Institution and executing the related business processes for the following purposes (“**Purposes**”);

- Evaluating the patient,
- Carrying out the inpatient or outpatient treatment of the patient,
- Carrying out the processes regarding the conducting the patient care procedures and in this context, delivery of food and cleaning support services by the concerning parties,
- Carrying out surgery activities,
- Carrying out necessary medical tests and examinations and conducting relevant processes,
- Providing information regarding appointment reminders, changes, and service delivery,
- Provision of medicines and relevant materials,
- Carrying out the medicine preparation processes and the controls whether the medicines are applied properly,
- Carrying out laboratory, visualization, etc. processes within the scope of diagnosis and treatment activities carried out with regard to the patient,
- Ensuring management of the patient’s personal belongings and providing vehicle protection services,
- Carrying out the processes related to the provision and performance of the products and services offered by the Institution,
- Carrying out the accounting and finance operations,
- Archiving/storing data on health and financial services provided in accordance with the legislation,
- Receiving and evaluating the requests and complaints,
- Planning and conducting patient relations management processes,
- Following-up and carrying out legal affairs,
- Fulfilling official institution requests,
- Carrying out information security processes,
- Conducting audit and ethical activities,
- Planning and conducting internal processes within the Institution,
- Providing air ambulance, ambulance rental services,

- Planning and conducting necessary activities for customization of the products and services offered by our Institution according to the likings, usage habits, and needs of the relevant persons and offering them to the relevant persons,
- Transmitting financial information to the e-mail address you stated during the registration,
- Contacting the patient to receive and evaluate feedback on products and services offered by the Institution.

3) Recipient Parties and Purposes for Transferring Personal Data

Your collected personal data may be transferred in order to meet the Purposes to our vendors, legally authorized public institutions, and legally authorized private persons in accordance with the conditions for transferring personal data specified under Articles 8 and 9 of the Law and within the scope of the data processing conditions specified under Articles 5 and 6 of the Law. Upon the existence of your explicit consent, your personal data may be transferred to the contracted private insurance company or the intermediary institution authorized by the private insurance company limited for the purpose of carrying out the provision and invoicing processes for the services you have received, ensuring that you benefit from private health insurance and requesting payment confirmation regarding your treatment costs. Additionally, upon the existence of your explicit consent, your concerning health data and other personal data may be transferred to your relatives or third parties that you have specified upon your request and limited to this.

4) Method and Legal Basis of the Collection of Personal Data

Your personal data will be collected in order to meet the Purposes through our websites, Call Center, Koç Healthcare Patient Portal, our systems including integrated hospital information management system, portal(s) where online services are offered, and e-mail channels in the electronic environment and through cargo/mail, fax, face to face interviews channels in the physical environment. If your relatives are provided with opportunities regarding the services of the Institution within the scope of agreements concluded between contracted insurance companies and the Institution from time to time, your personal data could be obtained through information and documents provided by your relative. Your personal data are processed based on the following legal grounds in accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law.

Personal data concerning your health can be processed within the scope of Article 6/3 of the Law by the persons subject to secrecy obligation for the purposes of medical diagnosis, conducting treatment and nursing services, planning and management of health-care services; and your personal data can be processed based on the legal basis regarding the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract within the scope of the Article 5/2(c) of the Law for the following purposes:

- Evaluating the patient,
- Carrying out the inpatient or outpatient treatment of the patient,
- Carrying out the processes regarding the conducting the patient care procedures and in this context, delivery of food and cleaning support services by the concerning parties,
- Carrying out surgery activities,
- Carrying out necessary medical tests and examinations and conducting relevant processes,
- Provision of medicines and relevant materials,
- Ensuring management of the patient's personal belongings and providing vehicle protection services,
- Carrying out the processes related to the provision and performance of the products and services offered by the Institution,
- Transmitting financial information to the e-mail address you stated during the registration,

- Carrying out laboratory, visualization, etc. processes within the scope of diagnosis and treatment activities carried out with regard to the patient
- Providing air ambulance, ambulance rental services.

Personal data concerning your health can be processed within the scope of Article 6/3 of the Law by the persons subject to secrecy obligation for the purposes of medical diagnosis, conducting treatment and nursing services, planning and management of health-care services; and your personal data can be processed based on the legal basis regarding the legitimate interests of the Institution within the scope of Article 5/2 (f) of the Law;

- Planning and conducting patient relations management processes,
- Carrying out information security processes,
- Conducting audit and ethical activities,
- Planning and conducting internal processes within the Institution,
- Contacting the patient to receive and evaluate feedback on products and services offered by the Institution.

Personal data concerning your health can be processed within the scope of Article 6/3 of the Law by the persons subject to secrecy obligation for the purposes of medical diagnosis, conducting treatment and nursing services, planning and management of health-care services; and your personal data can be processed based on the legal basis regarding the legal obligation of the Institution within the scope of Article 5/2 (ç) of the Law;

- Carrying out the medicine preparation processes and the controls whether the medicines are applied properly,
- Receiving and evaluating the requests and complaints,
- Following-up and carrying out legal affairs,
- Carrying out the accounting and finance operations,
- Archiving/storing personal data concerning health and financial services provided in accordance with the legislation,
- Fulfilling official institution requests.

Based on your explicit consent:

- Planning and conducting necessary activities for customization of the products and services offered by our Institution according to the likings, usage habits, and needs of the relevant persons and offering them to the relevant persons

5) Data Subjects Rights as Envisaged Under Article 11 of the Law

As personal data subjects, we hereby declare that you are entitled to the following rights, set forth under Article 11 of the Law:

- To learn whether your personal data are being processed,
- To request information if your personal data have been processed,
- To learn the purpose of the processing of your personal data and whether they have been used accordingly,
- To learn which third parties domestic or abroad your personal data has been transferred to,
- To request rectification in case your personal data has been processed incompletely or inaccurately and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
- To demand the erasure or destruction of your personal data in case the reasons necessitating the processing have disappeared even though it was processed in accordance with the Law and other

relevant provisions and to demand the operations in this regard be reported to third parties your personal data has been transferred to,

- To object the occurrence of any consequence that is to your detriment by means of analysis of personal data solely through automated systems,
- To demand compensation for the damages that you have suffered as a result of unlawful processing of your personal data.

You may convey your requests concerning your rights listed above, to our Institution in accordance with the relevant legislation. If you want, you can convey your application via the application form which is accessible at <https://www.amerikanhastanesi.org/protection-of-personal-data>. Depending on the nature of your request, your application will be concluded as soon as possible, within 30 days at the latest and in principle, free of charge. However, if the process requires additional costs, a fee may be demanded according to the tariff determined by the Personal Data Protection Board.