

**PROTECTION AND PROCESSING OF PERSONAL DATA POLICY OF EIP ECZACIBAŐI
İLAC PAZARLAMA ANONİM ŐRKETİ**

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1. INTRODUCTION

1.1. Purpose and Scope of this Policy

The Law No. 6698 on the Protection of Personal Data (the “**Law**”) came into force on April 7, 2016, and this Processing and Protection of Personal Data Policy of EIP Eczacıbaşı İlaç Pazarlama Anonim Şirketi (the “**Policy**”) aims to ensure compliance of EIP Eczacıbaşı İlaç Pazarlama Anonim Şirketi (“**EIP**” or the “**Company**”) with the Law and to determine the principles to be followed by the Company in fulfilling its obligations regarding the protection and processing of personal data.

This Policy determines the conditions for the processing of personal data and sets out the main principles adopted by the Company in the processing of personal data. In this context, this Policy covers all personal data processing activities by the Company as covered by the Law, the owners of all personal data processed by the Company and all personal data processed by the Company.

The issues regarding the processing of personal data of the company employees are not covered by this Policy and are regulated separately in the Policy on the Processing and Protection of Employees’ Personal Data of EIP Eczacıbaşı İlaç Pazarlama Anonim Şirketi.

Definitions related to the terms used in this Policy are given in ANNEX-1.

1.2. Enforcement and Amendment

This Policy was published on the website by the Company and made public. In case of any conflict between the current legislation, especially the Law, and the regulations in this Policy, the provisions of the legislation shall prevail.

The Company reserves the right to amend this Policy in line with the legal regulations. You can find the current version of this Policy on the Company website at www.eczacibasiilac.com.tr.

2. DATA OWNERS, DATA PROCESSING PURPOSES AND DATA CATEGORIES FOR PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY

2.1. Data Owners

The data owners under this Policy are all natural persons except the employees of the Company whose personal data are processed by the Company. In this context, the categories of data owners are as follows:

DATA OWNER CATEGORIES		DESCRIPTION
1	Customer	It means the natural persons who benefit from the products and services offered by the Company.

2	Potential Customer	It means the natural persons that are potential customers and showing their interest of using the products and services offered by the Company.
3	Visitor	It means the natural persons visiting the Company, the Company's building, compound and website.
4	Employee Candidate	It means the natural persons who apply for a job by sending a CV to the Company or other methods.
5	Third Parties	It means the natural persons other than the Company's employees and the categories of data owners listed above.

The data owner categories are given for information purposes. The fact that any data owner does not fall under any of these categories does not disqualify them from being a data owner as specified in the Law.

2.2. Purposes of Personal Data Processing

Your personal data and private personal data may be processed by the Company in accordance with the personal data processing conditions specified in the Law and the related legislation for the following purposes:

MAIN PURPOSES	SECONDARY OBJECTIVES
Design, coordination, development, execution of company-specific commercial activities, planning and execution of activities for business development and commercial activities	<ol style="list-style-type: none"> 1. Planning and execution of customer relationship management processes 2. Processes for establishing and executing contracts and performing post-contract services 3. Performing legally required notifications/transactions/records Follow-up and execution of legal affairs, providing legal opinions 4. Execution of contracts with customers and conduct, management, planning and execution of relations with customers 5. Planning, monitoring and execution of activities for finance and accounting 6. Performance of legal obligations, communication with public institutions, execution of activities related to contract follow-up 7. 8. Planning and execution of the establishment and management of information technologies infrastructure

	<ol style="list-style-type: none"> 9. Planning and execution of activities for the development, monitoring and control of commercial activities, studies and operations
<p>Customizing products and services for the individuals, designing and executing activities for profiling, promotion and marketing</p>	<ol style="list-style-type: none"> 1. Planning and execution of activities such as events and information for healthcare professionals 2. Planning and execution of sales and marketing activities and activities such as promotion, information, sample delivery, trial product delivery, and receiving feedback on products 3. Planning and execution of activities such as events and information for healthcare professionals
<p>Design, execution and development of Human Resources operations and activities</p>	<ol style="list-style-type: none"> 1. Fulfillment of obligations arising from labor contracts and/or legislation for the Company's employees 2. Performing the operations that must be performed within the scope of the employees' contracts
<p>Ensuring the legal, technical and commercial-occupational safety of the Company and the persons in a business relationship with the Company, and carrying out activities for the performance of the legal obligations</p>	<ol style="list-style-type: none"> 1. Giving information to authorized institutions and organizations due to the legal obligations, and performing the activities and obligations related to the audits 2. Fulfillment of the obligations regarding occupational health and safety and, for this purpose, the design, execution, control and development of OHS operations such as measures and emergency action plans. 3. Planning and execution of internal and external audit activities 4. Planning and execution of actions and operations regarding the corporate and partnership law 5. Keeping records of the parties in business relation with the company, and planning and execution of listing activities 6. Planning and execution of organizational structuring, follow-up and works for conducting company activities in accordance with the company policies, guidelines, articles of association and the relevant legislation. 7. Carrying out activities to ensure that data are kept accurate and up to date.
<p>Planning, execution and management of corporate relations</p>	<ol style="list-style-type: none"> 1. Management, development, planning and execution of relations with suppliers/dealers/business partners 2. Design, development and execution of corporate management and communication activities 3. Planning and execution of business continuity activities 4. Planning and execution of external training activities

Design and execution of request and complaint management and aftersales processes	1. Planning and execution of request and complaint management activities for receiving, evaluating and finalizing requests and complaints
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2.3. Personal Data Categories

Your personal data categorized below may be processed by the Company in accordance with the personal data processing conditions specified in the Law and the related legislation:

PERSONAL DATA CATEGORIZATION	DESCRIPTION
Identity Data	All information regarding the identity of any person in the documents such as driver’s license, ID card, certificate of residence, passport, attorney ID, marriage certificate
Communication Data	Information to contact the data owner, such as phone number, address, email
Customer Data	Information obtained and generated about the concerned person as a result of our commercial activities and the operations carried out by our business units.

Data on Family Members and Close Relatives	Information about the family members and close relatives of the personal data owner that is processed for the products and services we offer or to protect the legal interests of the Company and the data owner.
Customer Transaction Data	Information on the records about the use of our products and services, and information such as the instructions and requests of the customer required to use our products and services
Security Data of the Physical Location	Personal data regarding the records and documents such as camera records and fingerprint records taken during the entrance to and stay in the physical location
Transaction Safety Data	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities
Financial Data	Personal data processed regarding information, documents and records showing all kinds of financial results created as per the type of the legal relationship established by our company with the owner of the personal data
Employee Candidate Data	Personal data processed about the individuals who applied to become an employee of our company or the individuals who are evaluated as employee candidates in line with the human resources needs of our company as per the commercial custom and honesty rules or the individuals who currently work at our Company
Legal Action and Compliance Data	Personal data processed within the scope of determining and tracking our legal receivables and rights, and the performance of our debts, and those processed for compliance with our legal obligations and our company policies
Audit and Inspection Data	Personal data processed within the scope of our company's legal obligations and compliance with the company policies
Private Personal Data	Data belonging to persons, relating to their race, ethnicity, political convictions, philosophical beliefs, religions, denominations or other beliefs, clothing, memberships to associations, foundations or unions, their health, sexual life, criminal conviction and security measures, as well as biometric and genetic data, are considered to be private personal data.
Promotion Data	Personal data processed for the promotion and advertisement of our products and services in line with the usage habits, tastes and needs of the owner of the personal data, and reports and assessments created as a result of such processing
Request/Complaint Management Data	Personal data regarding the receipt and evaluation of any request or complaint addressed to our company
Reputation Management Data	Information collected for the purpose of protecting the commercial reputation of our company and information related to the actions taken and the related assessment reports
Incident Management Data	Personal data processed in order to take necessary legal, technical and administrative measures against the emerging events in order to protect the commercial rights and interests of our company and the rights and interests of our customers.

5. PRINCIPLES AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

3.1. Principles for the Processing of Personal Data

Your personal data is processed by the Company in accordance with the personal data processing principles set out in Article 4 of the Law. It is imperative to comply with these principles for each personal data processing activity:

- ▢ ***Processing of personal data in accordance with the law and the honesty rules***; the Company acts in accordance with the laws, secondary regulations and general principles of law in the processing of your personal data, and it is committed to processing any personal data as limited to the purpose of such processing, and taking into account the reasonable expectations of data owners.
- ▢ ***The accuracy and up-to-date status of personal data***; the Company is committed to ensure that your personal data processed by the Company are up-to-date and that the relevant checks are made. Data owners are entitled to request correction or deletion of their inaccurate and outdated data.
- ▢ ***Processing personal data for specific, clear and legitimate purposes***; the Company determines the purposes of data processing prior to each personal data processing activity and ensures that these objectives are not illegal.
- ▢ ***Personal data should be associated with, limited and restrained to the purpose for which it is processed***; the data processing is limited by the Company only to the personal data required to achieve the purpose of data collection, and necessary steps are taken to avoid processing personal data not associated with this purpose.
- ▢ ***Keeping personal data for as long as required by the legislation or the purposes of processing***; personal data is deleted, destroyed or anonymized after the purpose of processing such personal data by the Company or after the period stipulated in the legislation expires.

3.2. Conditions for 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 such conditions are given below:

- ▢ ***In cases where the owner of the personal data has given his/her express consent*** where other data processing conditions do not exist,
In accordance with the general principles under 3.1, the personal data of the data owner may be processed by the Company upon the consent of the data owner given with the free will of the data owner who has sufficient information about the personal data processing, without any hesitation and only as limited to such purpose.
- ▢ ***In case the personal data processing is clearly stipulated by the law***, personal data may be processed by the Company without the express consent of the data owner. In this case, the Company may process personal data within the framework of the relevant legal regulation.
- ▢ ***In case the explicit consent of the data owner may not be obtained due to actual impossibility, yet personal data processing is mandatory***, personal data belonging to the data owner, who is unable to give his/her consent or whose consent cannot be validated, may be processed by the Company if it

is mandatory to process such personal data to protect the life or bodily integrity of the data owner or any third party.

- ***In the event that the personal data processing is directly related to the establishment or performance of a contract***, personal data shall be processed if it is necessary to process such personal data that belongs to the parties of a contract established or already signed by and between the data owner and the Company.
- ***In the event that the Company is obliged to carry out personal data processing to fulfill its legal obligation as the data controller***, the Company processes personal data in order to fulfill its legal obligations under the current legislation.
- ***The fact that the data owner has publicized his/her personal data***, any personal data disclosed to or made public in any way by the data owner may be processed by the Company, even without the explicit consent of the data owner, as limited to the purpose of publicity.
- ***In the event that personal data processing is necessary for the establishment, use or protection of a right***, the Company may, to the extent of such necessity, process the personal data of the data owner without the explicit consent of the data owner.

□

Provided that no harm is done to the fundamental rights and freedoms of the data owner, in the event that data processing is mandatory for the legitimate interests of the data controller, personal data may be processed by the Company, provided that the interest balance of the data owner and the Company is ensured. In this context, the Company determines the legitimate interest to be obtained by the Company as a result of the processing in the processing of the data based on the legitimate interest. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data owner and, if it deems that this balance is protected, it processes such data.

3.3. Conditions for the Processing of Private Personal Data

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

The Company may process private personal data by providing additional measures determined by the Personal Data Protection Board in the following cases:

□

The processing of private personal data other than data on health and sexual life may be carried out if the data owner gives explicit consent or when clearly prescribed by law.

□

Data relating to health and sexual life may only be processed without explicit consent of the data owner by individuals or authorized institutions or organizations under the confidentiality obligation for the purposes of protection of public health, the conduct of preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and financing.

6. TRANSFER OF PERSONAL DATA

In accordance with the additional regulations listed in the Articles 8 and 9 of the Law and determined by the Personal Data Protection Board; in case there are conditions for the transfer of personal data, the Company may transfer personal data domestically or abroad.

□

The transfer of personal data to third parties domestically: Your personal data may be transferred by the Company, provided that at least one of the data processing conditions set forth in Articles 5 and 6 of the Law that are explained under Section 3 of this Policy, and in accordance with the basic principles regarding the data processing conditions.

□

The transfer of personal data to third parties abroad: Your personal data may, without the explicit consent of the data owner, be transferred by the Company abroad, provided that at least one of the data processing conditions set forth in Articles 5 and 6 of the Law that are explained under Section 3 of this Policy, and in accordance with the basic principles regarding the data processing conditions.

If the country to which the data will be transferred is not among the safe countries as announced by the Personal Data Protection Board, personal data may be transferred to third parties abroad in the presence of at least one of the data processing conditions set forth in Articles 5 and 6 of the Law (see Section 3 of this Policy) when the company and the data officer in the country concerned undertake the sufficient safety in writing and if the Personal Data Protection Board allows this operation.

In accordance with the general principles of the law and the data processing conditions in Articles 8 and 9, the Company may transfer data to any parties categorized in the table below:

CATEGORIZATION OF PARTIES SUBJECT TO TRANSFER	SCOPE	PURPOSE OF TRANSFER
Business Partner	Parties with which the Company has established a business partnership while carrying out its commercial activities	Limited disclosure of personal data to ensure the fulfillment of the business partnership's objectives
Supplier	Parties that provide services for the Company to continue its commercial activities in accordance with the instructions received from the Company and based on their contract with the Company.	Limited transfer for the services outsourced from the supplier
Subsidiaries	Any company which is a subsidiary of the Company	Limited transfer of personal data for the purpose of carrying out commercial activities that require the participation of the subsidiaries

Legally Authorized Public Authority	Public institutions and organizations legally authorized to receive information and documents from the Company	Disclosure of personal data as limited to the purpose of information request by relevant public institutions and organizations
Legally Authorized Private Institution	Private legal persons legally authorized to receive information and documents from the Company	Disclosure of personal data as limited to the purpose of requests by the relevant private legal persons within their legal authority

7. DISCLOSURE TO DATA OWNERS AND THE RIGHTS OF DATA OWNERS

According to Article 10 of the Law, the data owners should be informed about the processing of personal data before or at the time of processing such data. In accordance with the relevant article, the necessary structure within the company has been established to ensure that the data owners are enlightened in every situation where the Company, as the data controller, processes any personal data. In this context:

- Please review section 2.2 of this Policy for the purposes of processing your personal data.
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Please review Section 4 of this Policy for the parties to which your personal data is transferred and for the purpose of such transfer.

□

Please refer to section 3.2 and 3.3 of this Policy to review the conditions for processing your personal data, which can be collected through different channels in physical or electronic media.

□ We would like to indicate that you, the data owner, have the following rights in accordance with Article 11 of the Law:

- To know if your personal data is processed or not,
- If your personal data has been processed, to request information in this regard,
- To know the purpose of processing of your personal data and whether or not such has been used for its intended purpose,
- To know the identities of the domestic or foreign third parties to which your personal data has been transferred,
- To request the correction of your personal data in case of incomplete or inaccurate data, to request that this correction be communicated to third persons to which such personal data has been transferred in the first place,
- Although your personal data has been processed in accordance with the provisions of the Law and other related laws, to request the deletion or destruction of your personal data in case the reasons that require such processing cease to exist, and to request that this action be communicated to third persons to which such personal data has been transferred,
- Object to the occurrence of a result which is detrimental to the person concerned as a result of analyzing the processed data exclusively through automatic systems,
- To request compensation for any loss suffered by you in case your personal data is processed in violation of the relevant legislation.

You can submit your requests regarding your rights listed above to our Company by filling out the Data Owner Application Form of EIP Eczacıbaşı İlaç Pazarlama Anonim Şirketi available at this [link](#). Depending on the nature of your request, your submission shall be concluded free of charge as soon as possible and within thirty days in any case; however, if this operation requires any cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

During the evaluation of the applications, the Company first determines whether the requesting party is the real right holder. However, the Company may request detailed and additional information in order to better understand the request when it deems necessary.

The Company sends the replies for the applications of the data owner in writing or electronically. If the application is rejected, the justifications for rejection shall be explained to the data owner.

In case the personal data is not obtained directly from the data owner, the Company enlightens the data owners (1) within a reasonable time from the acquisition of personal data, (2) at the initial communication, if personal data will be used for communication with the data owner, (3) until when the personal data is transferred for the first time if such personal data is to be transferred.

8. DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA

Although it has been legally processed pursuant to Article 7 of the Law, the Company deletes, destroys or anonymizes personal data in accordance with the guidelines published by the Authority in case the reasons requiring such processing no more apply or if requested so by the data owner.

9. THE SCOPE OF THE LAW AND RESTRICTIONS ON ITS PRACTICE

The following situations are out of the scope of the Law:

- The processing of personal data by natural persons within the scope of activities related to the data owner or his/her family members living in the same residence, provided that such data is not given to third parties and the obligations regarding data safety are complied with.
- The processing of personal data for research, planning and statistical purposes by anonymization of the same with official statistics.
- The processing of personal data for art, history, literature and scientific purposes or freedom of thought provided that such processing does not violate the national defense, national security, public safety, public order, economic security, the privacy of personal life or any personal right.
- The processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to provide national defense, national security, public safety, public order or economic security.
- The processing of personal data by judicial authorities or enforcement authorities regarding investigations, prosecutions, trials or enforcement proceedings.

There is no need for disclosure to the data owners by the Company in the cases listed below, and the data owners may not exercise their rights specified in the Law, except for their right to remedy their damages:

- Personal data processing is necessary for the prevention of crime or for any criminal investigation.
- The processing of personal data publicized by the person concerned.
- The fact that personal data processing is necessary for the execution of supervisory or regulatory tasks and for disciplinary investigations or prosecutions by the authorized public institutions and organizations and the occupational institutions with public institution status based on their legal power.
- The fact that personal data processing is necessary for the protection of the State's economic and financial interests in relation to budget, tax and financial matters.

ANNEX-1: DEFINITIONS

DEFINITION	
Explicit Consent	An informed consent freely given on a particular subject.
Anonymization	Rendering it impossible for personal data to be associated in any manner with the identity of a natural person who is identified or identifiable, even if they are matched with other data.
Employee	Any natural person who is the employee of the Company.
Employee Candidate	Any natural person who is not the Company's employee, but has the status of Company employee candidate through various methods.
Personal Health Data	It is any and all kinds of health information about any identified or identifiable natural person.
Personal Data	It is any and all kinds of information about any identified or identifiable natural person.
Data Owner	Any natural person whose personal data is processed.
Processing of Personal Data	Any transaction carried out on any data, such as obtaining, recording, storage, preservation, alteration, reorganization, disclosure, transfer, takeover, making available, classifying the personal data or preventing its use, by fully or partly automatic means, or by non-automatic means provided that they are part of a data entry system.
The Law	The No. 6698 on the Protection of Personal Data published in the Official Gazette with issue number: 29677 and dated April 7, 2016.
Private Personal Data	Any data that is related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
Policy	Personal Data Protection and Processing Policy of EIP Eczacıbaşı İlaç Pazarlama Anonim Şirketi
Company/EIP	EIP Eczacıbaşı İlaç Pazarlama Anonim Şirketi
Business Partners	Persons with whom the Company has established a partnership within the scope of contractual relations within the scope of its commercial activities.
Data Owner	Any natural person whose personal data is processed.
Data Processor	Any natural or legal person who processes personal data on behalf of the data controller based on the authority entitled by such data controller,

Data Controller	Any person who determines the purposes and means of processing personal data and manages the place where such data is kept systematically.
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