

Privacy and Personal Data Protection Policy

1. Introduction

Op. Dr. Sina KADERİ Clinic (“Clinic”) attaches utmost importance to protecting the **fundamental rights and freedoms** of individuals, especially the **right to privacy**. In this regard, the Clinic processes and protects all personal data in accordance with the **Turkish Personal Data Protection Law No. 6698 (KVKK)** and, where applicable, the **European Union General Data Protection Regulation (GDPR)**.

The Clinic takes all necessary technical and administrative measures to prevent unauthorized access, unlawful use, or disclosure of personal data.

2. Purpose of the Policy

This Policy aims to inform **patients, clients, employees, job applicants, and visitors** about:

- How their personal data is collected, processed, stored, and protected,
- Their rights regarding personal data under **KVKK and GDPR**,
- The Clinic’s obligations to ensure transparency and security in data processing.

3. Scope

This Policy applies to all personal data processed by Op. Dr. Sina KADERİ Clinic, either fully or partially by automated means, or manually where part of a data recording system.

It applies to **natural persons only**. Legal entities are not covered by this Policy.

4. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.

- **Special Categories of Personal Data:** Data relating to health, biometric or genetic information, race, political opinions, religious beliefs, etc.
- **Processing:** Any operation performed on personal data, such as collection, storage, use, transfer, or destruction.
- **Data Subject:** The individual whose personal data is processed (e.g., patient, visitor).
- **Data Controller:** Op. Dr. Sina KADERİ Clinic, responsible for determining the purposes and means of processing personal data.

5. Categories of Personal Data

The Clinic may process the following categories of personal data:

- **Identity Information** (name, surname, ID/passport number, date of birth, gender)
- **Contact Information** (address, phone, email, IP address)
- **Health Data** (medical history, test results, diagnosis, treatment records, medications, images)
- **Financial Data** (billing, payment details, insurance information)
- **Employment Data** (for employees and job applicants)
- **Visual & Audio Records** (CCTV, photographs, video recordings)

6. Purposes of Processing

Personal data is processed for the following purposes:

- Providing **medical diagnosis, treatment, and healthcare services**
- Complying with **legal and regulatory obligations**
- Managing **patient files and appointments**
- Ensuring **patient safety and clinic security**
- **Financial transactions** and invoicing
- **Health tourism services**, including travel and accommodation arrangements
- Fulfilling **employment obligations** for staff
- Responding to **requests, complaints, and legal requirements**

7. Transfer of Personal Data

Personal data may be transferred to:

- **Authorized healthcare professionals** for consultation,
- **Hospitals, laboratories, and insurance companies,**
- **Regulatory authorities** (e.g., Ministry of Health),
- **Financial and legal advisors,**
- **IT service providers** (secure databases, clinical management software),
- **Travel and accommodation partners** for health tourism patients.

All transfers are carried out with appropriate safeguards in compliance with KVKK and GDPR.

8. Data Retention and Destruction

Personal data is retained only for the period required by law or for the purpose of processing.

When this period ends, data is **deleted, destroyed, or anonymized** in accordance with the Clinic's Data Retention and Destruction Policy.

9. Rights of Data Subjects

Under **KVKK (Art. 11)** and **GDPR**, individuals have the right to:

- Learn whether their data is being processed,
- Access and request a copy of their data,
- Request correction or updating of incomplete/incorrect data,
- Request deletion or anonymization of data,
- Object to unlawful processing or transfer,
- Restrict processing where permitted by law,
- Request data portability (GDPR),
- File complaints with the **Personal Data Protection Authority (KVKK)** or relevant **EU supervisory authorities**.

To exercise these rights, Data Subjects may apply in writing to:

Op. Dr. Sina KADERİ Clinic – Bostancı Mah, Bağdat Cad, Çınarlı Sk. No:10 D:7 34744 Kadıköy/İstanbul

10. Effective Date

This Policy entered into force on **01.09.2024** and is kept up-to-date in accordance with legal requirements.