

PROCESSING AND PROTECTION OF PERSONAL DATA

CLARIFICATION TEXT

A. INTRODUCTION – DATA SUPERVISOR

Data privacy is of the utmost importance to Pharmananda Domestic and Foreign Trade INC. (“PHARMANANDA”), and we attach particular importance to the openness and transparency of our processing of your personal data. In this context, we would like to inform you about your personal data in order to fulfill our disclosure obligation arising from Article 10 of the Protection of Personal Data Law No. 6698 (“PDPL”). The legal reason and your rights regarding the personal data in question are listed below.

PHARMANANDA contact information is as follows:

- CENTRAL REGISTRATION SYSTEM Number:0333-1943-0970-0001
- Post Address: Küçükbakkalköy Mah. Yüksel Sok. Manolya Ecza Deposu Blok No:3 İç Kapı No:3 Ataşehir/İSTANBUL- TÜRKİYE
- Phone: +90 (216) 469 30 00
- E-mail: info@pharmananda.com

B. PRINCIPLES ON PROCESSING AND TRANSFERRING PERSONAL DATA

The following table shows the types of personal data we collect from you, the purpose of collection, collection methods, legal basis/legal reason and transfer conditions to third parties:

POTENTIAL BUSINESS PARTNER

Processed Personal Data Categories:

ID Information(Full Name), **Contact Information** (Phone Number, E-mail, Address, Country), **Company Information**(Business Data)

Purposes of Processing Personal Data:

Web

If you fill in the contact form on our site and request us to contact you, your identity and contact information will be processed for the purpose of carrying out communication activities, making use of the services offered and deemed appropriate by PHARMANANDA, establishment, execution, resolution of requests, problems, questions and complaints, providing general information about services, defining business partner/customer and/or potential business partner/customer, confirming information, informing authorized persons, institutions and organizations, accounting and purchasing processes monitoring, legal processes and compliance with the legislation, ensuring information and transaction security and preventing malicious use, making necessary arrangements to ensure that the processed data is accurate and up-to-date, establishing and implementing processes for ensuring information security and internal process improvements, financing our products and services, planning and execution of necessary audit activities, creation, follow-up and archiving of business partner/customer records in order to achieve reconciliation, ensure that activities are carried out in accordance with our company's procedures and relevant legislation, negotiating contracts concluded or planned to be concluded.

Legal Basis for Personal Data Processing:

Your personal data within this scope, for the realization of the above-mentioned purposes by PHARMANANDA, as specified in the relevant legislation and Article 5 of the PDPL;

- Request of the person concerned,
- Necessity to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- Data processing being mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject,

processed on the basis of legal reasons.

Personal Data Collection Methods:

Your above-mentioned personal data is collected through electronic media (corporate website), forms that you contact with our Company.

Transfer of Personal Data:

Your personal data mentioned above:

Provided that it does not harm the fundamental rights and freedoms of the data subject, the legitimate interests of the data controller are based on legal reasons; In order to fulfill our legal obligations to group companies, partners, to provide information, documents and other related obligations to authorized persons and official institutions in accordance with legal regulations and legislation, and to use our legal rights such as litigation and reply rights (use of the right), based on legal reasons; To our consultants such as legal advisors, financial advisors and legally authorized persons, institutions and organizations, On the basis of legal reasons that it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract; Information technology etc. It is transferred to our company's professional service providers (database and server service providers, e-mail server service providers, archiving service providers) in order to receive product and service support in matters requiring expertise.

C. DELETING, DESTROYING OR ANONYMIZING PERSONAL DATA

Although it has been processed in accordance with the Protection of Personal Data Law No. 6698 and the provisions of other relevant laws, in the event that the reasons for processing are no longer valid, the personal data is deleted, destroyed or anonymized by the data controller, either officially or upon the request of the data subject.

In cases where PHARMANANDA has the right and/or obligation to preserve personal data in accordance with the provisions of the relevant legislation, the right not to fulfill the request of the data owner is reserved.

Your personal data obtained during our company activities comply with the general principles and regulations specified in our Company's Clarification Text and procedures regarding storage and destruction prepared in accordance with the provisions of the PDPL, the Regulation on the Deletion, Destruction or Anonymization of Personal Data, and other relevant legislation, in particular the Constitution of the Republic of Turkey, are properly stored for 10 years and destroyed at the end of the storage period. The personal data you have shared with the Company through the channels mentioned in this Clarification Text will be processed in accordance with the legislation on the protection of personal data, especially the PDPL, and in accordance with the periods mandated by other legislation, as long as the above legitimate purposes do not disappear in any case. In this context, your personal data will be destroyed within the framework of the Personal Data Storage and Disposal Policy published within the company in the first destruction period, if all the personal data processing conditions in Article 5 of the PDPL are eliminated.

D. YOUR RIGHTS AS A CONCERNED PERSON STATED IN ARTICLE 11 OF PDPL

Your legal rights that you can use regarding your personal data are listed in Article 11 of the PDPL, briefly as follows:

- 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,
- Requesting the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the PDPL and requesting that the transactions made pursuant to these provisions be notified to third parties to which 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.

You can forward your questions and requests regarding your personal data to the Data Controller by the following methods, with a petition prepared in accordance with the conditions specified in the Communiqué on Application Procedures and Principles, or with the attached “PDPL Application Form”:

Application Method	Address to Apply
Personal Written Application	Küçükbakkalköy Mah. Yüksel Sok. Manolya Ecza Deposu Blok No:3 İç Kapı No:3 Ataşehir/ İSTANBUL- TÜRKİYE
Application Through Notary Public	Küçükbakkalköy Mah. Yüksel Sok. Manolya Ecza Deposu Blok No:3 İç Kapı No:3 Ataşehir/ İSTANBUL- TÜRKİYE
Application via Registered Electronic Mail (KEP) by Signing with Secure Electronic Signature or Mobile Signature	pharmananda@hs01.kep.tr
Application via your e-mail address previously notified to PHARMANANDA and registered in the system	info@pharmananda.com

As personal data owners, if you submit your requests regarding your rights to PHARMANANDA, PHARMANANDA will conclude your request free of charge within 30 (thirty) days at the latest. However, if the response to your application requires a cost in accordance with the legislation, the fee in the tariff determined by the Personal Data Protection Board may be charged by PHARMANANDA. In the event that your application is rejected, you find the answer insufficient or we are unable to respond to the application on time, you can make a complaint to the KVK Board within 30 (thirty) days from the date you learn our answer and, in any case, within 60 (sixty) days from the date of application.

The detailed Clarification Text, updated in the light of current KVK Board decisions and requirements, is followed by the PHARMANANDA Data Protection Committee and published on <http://www.pharmananda.com>. You can access the Clarification Text on the site whenever you want.

E. OUR CONTACT INFORMATION

- **Pharmananda Domestic and Foreign Trade INC.**
- Küçükbakkalköy Mah. Yüksel Sok. Manolya Ecza Deposu Blok No:3 İç Kapı No:3 Ataşehir/ İSTANBUL-TÜRKİYE
- Phone: +90 (216) 469 30 00 _____
- E-mail: info@pharmananda.com

APPLICATION FORM UNDER THE LAW ON THE PROTECTION OF PERSONAL DATA

This application form has been prepared in order to evaluate your applications in accordance with Articles 11 and 13 of the the Protection of Personal Data Law No. 6698 (“PDPL”) and to contact you when necessary.

As the person requesting the right to exercise your personal data within the scope of Articles 11 and 13 of the PDPL, you must fill in the following information. In this context, applications made through a written petition or this application form are accepted.

Contact Information

Full Name	
T.R. Identification Number For foreigners; a) Nationality: b) Passport Number or Foreigner Identity Number:	
Phone Number	
E-mail Address	
Address	
Your connection with PHARMANANDA	<input type="checkbox"/> Client <input type="checkbox"/> Employee <input type="checkbox"/> Other (Please specify) _____

Your Request/Requests Regarding Your Personal Data

I want to know whether personal data is processed about me	
If personal data about me is being processed, I request information about these data processing activities	

Contact Information

<p>If personal data is being processed about me, I would like to know the purpose of processing and whether they are used in accordance with the purpose of processing</p>	
<p>If my personal data is transferred to third parties at home or abroad, I would like to know about these third parties.</p>	
<p>I think that my personal data is incomplete or incorrectly processed and I would like them to be corrected. (Please specify reason)</p>	
<p>Although my personal data has been processed in accordance with the provisions of the law and other relevant laws, I think that the reasons for its processing are void and within this framework;</p> <ul style="list-style-type: none"> • a) I request that my personal data be deleted. • b) I request that my personal data be destroyed. • c) I request that my personal data be anonymized 	<p style="text-align: center;">Your choice:</p> <p style="text-align: center;">a)</p> <p style="text-align: center;">b)</p> <p style="text-align: center;">c)</p>
<p>I want the third parties to whom my personal data has been transferred to be notified in my requests that I have stated in numbers 5 and 6.</p>	
<p>I believe that my personal data processed by your company is analyzed exclusively through automated systems and as a result of this analysis, there is a negative outcome for me. I object to this conclusion.</p>	
<p>I suffered damage due to the illegal processing of my personal data. I demand compensation for this damage. (Please specify details)</p>	

Details of the request (Please specify the details of your request)

Contact Information

You can submit your application regarding these requests regarding the implementation of the PDPL by one of the methods specified below.;

1. *Ist hand,*
2. *By registered letter with return receipt,*
3. *With a wet signature to the address Küçükbakkalköy Mah. Yüksel Sok. Manolya Eczacı Deposu Blok No:3 İç Kapı No:3 Ataşehir/ İSTANBUL- TÜRKİYE through a notary public or,*
4. *Signing with your secure electronic signature issued under the Electronic Signature Law No. 5070 to pharmananda@hs01.kep.tr*
5. *To info@pharmananda.com via your e-mail address that you have previously notified to PHARMANANDA and registered in the system, or,*
6. *With another method prescribed by the Personal Data Protection Board,*

You must attach the documents that will enable you to identify your application and the documents supporting your objection/claim to your request.

Your request will be evaluated and finalized as soon as possible and in any case within the time specified in the PDPL. In written applications, the date of notification of the documents to PHARMANANDA, and in applications made by other methods, the date of receipt of the application by PHARMANANDA is the application date.

In order for third parties to apply on your behalf, there must be a special power of attorney issued through a notary public on behalf of the applicant. In applications to be made on behalf of children under custody/guardianship, a copy of the documents proving the custody/guardianship relationship must be sent.

Our company may request information and documents from you in order to determine whether you are the applicant, and may ask you questions about your application in order to clarify the matters stated in the application.

In order for your application to be answered in a timely manner, you must fill in all the information in this form completely and submit the relevant information and documents. Otherwise, you will be requested to complete the missing information before responding to you. This situation may extend the response time of your application.

In accordance with Article 13 of the PDPL, a response to your application will be sent in writing or electronically.

Specify the method of notifying you of the response to be given to your application by our company.

- I want it sent to my address.
- I want it sent to my e-mail address.

If the transaction requires a cost, our Company may charge the fee in the tariff determined by the Board.

Data Subject Relevant Statement

I request that the application I have made pursuant to the PDPL be evaluated and finalized within the framework of the request/requests I have stated above, I accept, declare and undertake that the information and documents I have provided in this application are correct, complete, up-to-date and belong to me.

APPLICANT PERSON;

Full Name :

TR ID NO :

Address :

Date :

Signature :