

Please make sure that the following special categories of personal data are not included in the requests, complaints and/or suggestions to be communicated to our Company:

- race;
- ethnic origin;
- political opinion;
- philosophical belief, religion, religious sect or other belief;
- clothing and attire;
- memberships to associations, foundations and trade union;
- health;
- sexual life;
- criminal convictions and security measures;
- biometrics; and
- genetics.

BİLİM İLAÇ SANAYİİ VE TİCARET ANONİM ŞİRKETİ
PRIVACY NOTICE ON NON-PHARMACOVIGILANCE CALL CENTER AND REQUEST / COMPLAINT / SUGGESTION PROCESSES

1. Data Controller

Your personal data are processed by Bilim İlaç Sanayii ve Ticaret Anonim Şirketi, a joint stock company registered at Istanbul Trade Registry Directorate with the registration number of 79251-0 and having its registered office situated at Kaptanpaşa Mah. Zincirlikuyu Cad. No: 184 Beyoğlu / İstanbul (the “**Company**”), in its capacity as a data controller, in accordance with the provisions of the Law No. 6698 on the Protection of Personal Data (the “**LPPD**”) and pursuant to this Privacy Notice on Non-Pharmacovigilance Call Center and Request / Complaint / Suggestion Processes (the “**Privacy Notice**”).

This Privacy Notice is applicable to the activities concerning the request / complaint / suggestion and call center processes carried out not only by our Company but also by our group company Hüsnu Arsan İlaçları Anonim Şirketi.

Our Company respects your rights regarding your privacy and the protection of your personal data, and aims to establish and maintain a relationship with your party that is based on trust. Within this scope, our Company processes your personal data in accordance with all legal regulations on the protection of personal data, particularly the LPPD, and adopts all security measures which are required to ensure the security of your data. This Privacy Policy is intended to provide clarifications on the scope of processing of your personal data which are collected by our Company within the framework of your request / complaint / suggestion applications and/or via our call center. For further details on the processing of your personal data by our Company, please visit Bilim İlaç Sanayii ve Ticaret Anonim Şirketi’s Policy on the Protection and Processing of Personal Data, which is accessible from <https://www.bilimilac.com.tr/en/protection-of-personal-data>

2. The Methods of Collection of Your Personal Data

Your personal data are collected by our Company wholly or partly by automated means or provided that the process is a part of any data filing system, through non-automated means, from physical and/or electronic environments, via our Company’s websites – particularly www.bilimilac.com.tr, printed forms, call center, information desks at our Company’s headquarters and other premises,

mobile application, e-mail, SMS, phone, facsimile, request / complaint / suggestion platforms, cargo/mail, online meeting / communication platforms, Company information technology systems, field force visits, internal integrated systems and integrated systems pertaining to authorized public institutions and organizations and private organizations and other methods (channels) which may be included in the future.

3. The Categories of Your Processed Personal Data and the Purposes for and the Legal Basis of the Processing of Your Personal Data

Your personal data categories which are processed within the scope of the collection, evaluation and conclusion of requests / complaints / suggestions; the conducting of communications with request / complaint / suggestion holders and the ensuring of satisfaction thereof in this regard and the improvement of their experiences; the management of customer satisfaction and customer relations; the improvement of customer experience; the management of quality standards procedures including product / service / process improvement processes; the carrying out of statistical evaluations; the management of audits and internal audits; the management of call center; the management of legal and consultancy affairs including the discharge of the statutory obligations and the conducting of disputes, to which the Company is a party and/or in which the Company is involved (e.g. lawsuits, execution proceedings, mediation); the management of communication, audit and reporting within the scope of compliance with the policies and procedures of our companies; the conducting of reputation and crisis management; the management of accounting and financial affairs; the carrying out of operations management; the management of storage and archiving activities; and the management of information security activities, and the purposes for and the legal basis for the processing of your personal data are thoroughly explained herein below.

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
|-------------------------------|---|
| Identification Data | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Information Security Processes; • Conducting of Audit / Ethics Activities; • Conducting of Activities in accordance with the Legislation; • Conducting of Finance and Accounting Affairs; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Attainment and Evaluation of Recommendations for the Improvement of Business Processes; |

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
|-----------------------------|---|
| | <ul style="list-style-type: none"> • Conducting of Activities for Ensuring Business Continuity; • Conducting of Logistics Activities; • Carrying out of After-Sale Support Services for Goods / Services; • Conducting of Goods / Services Manufacturing and Operations Processes; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. |
| Contact Details Data | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Information Security Processes; • Conducting of Audit / Ethics Activities; • Conducting of Activities in accordance with the Legislation; • Conducting of Finance and Accounting Affairs; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Attainment and Evaluation of Recommendations for the Improvement of Business Processes; • Conducting of Activities for Ensuring Business Continuity; • Conducting of Logistics Activities; • Carrying out of After-Sale Support Services for Goods / Services; • Conducting of Goods / Services Manufacturing and Operations Processes; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; |

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
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| | <ul style="list-style-type: none"> Furnishing of Information to Authorized Individuals, Institutions and Organizations. |
| Finance Data | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> Conducting of Information Security Processes; Conducting of Audit / Ethics Activities; Conducting of Activities in accordance with the Legislation; Conducting of Finance and Accounting Affairs; Follow-up and Conducting of Legal Affairs; Carrying out of Internal Audit / Investigation / Intelligence Activities; Conducting / Inspection of Business Activities; Conducting of Activities for Ensuring Business Continuity; Carrying out of After-Sale Support Services for Goods / Services; Conducting of Customer Relations Management Processes; Conducting of Storage and Archiving Activities; Conducting of Contractual Processes; Follow-up of Requests / Complaints; Furnishing of Information to Authorized Individuals, Institutions and Organizations. |
| Visual and Audio Recording Data <i>(processed only if you contact our Company via the call center.)</i> | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> Conducting of Information Security Processes; |

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
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| | <ul style="list-style-type: none"> • Conducting of Audit / Ethics Activities; • Conducting of Activities in accordance with the Legislation; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Attainment and Evaluation of Recommendations for the Improvement of Business Processes; • Conducting of Activities for Ensuring Business Continuity; • Carrying out of After-Sale Support Services for Goods / Services; • Conducting of Goods / Services Manufacturing and Operations Processes; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. |
| <p>Customer Transaction Data (<i>processed only if you are our customer.</i>)</p> | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Information Security Processes; • Conducting of Audit / Ethics Activities; • Conducting of Activities in accordance with the Legislation; • Conducting of Finance and Accounting Affairs; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Attainment and Evaluation of Recommendations for the Improvement of Business Processes; • Conducting of Activities for Ensuring Business Continuity; • Conducting of Logistics Activities; |

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
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| | <ul style="list-style-type: none"> • Carrying out of After-Sale Support Services for Goods / Services; • Conducting of Goods / Services Manufacturing and Operations Processes; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. |
| Legal Action Data | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Audit / Ethics Activities; • Conducting of Activities in accordance with the Legislation; • Conducting of Finance and Accounting Affairs; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. |

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
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| Processing/Transaction Security Data | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Information Security Processes; • Conducting of Audit / Ethics Activities; • Conducting of Activities Intended for Relations Management with and Satisfaction of Distributor's Customers; • Conducting of Activities in accordance with the Legislation; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting / Inspection of Business Activities; • Attainment and Evaluation of Recommendations for the Improvement of Business Processes; • Carrying out of After-Sale Support Services for Goods / Services; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; • Ensuring the Security of the Data Controller's Operations; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. |
| Request / Complaint / Suggestion Data | <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Information Security Processes; |

| Personal Data Category | Purposes for and Legal Basis of Processing of Personal Data |
|------------------------|---|
| | <ul style="list-style-type: none"> • Conducting of Audit / Ethics Activities; • Conducting of Activities in accordance with the Legislation; • Conducting of Finance and Accounting Affairs; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Attainment and Evaluation of Recommendations for the Improvement of Business Processes; • Conducting of Activities for Ensuring Business Continuity; • Conducting of Logistics Activities; • Carrying out of After-Sale Support Services for Goods / Services; • Conducting of Goods / Services Manufacturing and Operations Processes; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. |

4. The Domestic and Cross-Border Transfer of Your Personal Data to Third Parties

Your personal data which are retained by our Company may be accessed solely by our personnel who have been granted with restricted access authorization for the aforementioned purposes, to the extent as is necessary to fulfill their duties, and will not be transferred to third parties located in Turkey and/or abroad in cases where the conditions for transfer which are regulated in articles 8 and/or 9 of the LPPD are not satisfied. Nevertheless, your personal data which are processed within the scope of each personal data category listed hereinabove may be transferred to the following recipient groups if the aforesaid personal data processing conditions (legal grounds) for the data category concerned are further satisfied in terms of the purposes for transfer, and in accordance with articles 8 and/or 9 of the LPPD:

- to our **suppliers** (e.g. call center, information technology and data hosting service providers) located in Turkey and/or abroad, as limited with the identification, contact, finance, visual and audio, customer transaction, legal action, transaction security and request / complaint / suggestion personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to ensure the procurement of products and/services for the execution of our Company's operations;
- to our **group companies including our Company's affiliates** located in Turkey and/or abroad, as limited with the identification, contact, finance, visual and audio, customer transaction, legal action, transaction security and request / complaint / suggestion personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to enable the planning and/or materialization of the communication, audit and reporting activities for compliance with the policies and procedures of our group companies;

- to **potential buyers, sellers or other transacting parties** located in Turkey and/or abroad **and their employees, consultants and database service providers involved in the process, who are under a confidentiality obligation**, as limited with the identification, contact, visual and audio, customer transaction, legal action, transaction security and request / complaint / suggestion personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to facilitate the carrying out of the legal and financial due diligence of our Company in case of any potential corporate merger, acquisition, joint venture, de-merger and other structural changes; and
- to the **authorized public institutions and organizations** (e.g. courts, notaries, tax offices) in Turkey and/or abroad, as limited with the identification, contact, finance, visual and audio, customer transaction, legal action, transaction security and request / complaint / suggestion personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to fulfill our Company's statutory obligations and the follow-up the legal affairs thereof.

5. The Period for Processing of Your Personal Data

Your personal data which are acquired during our Company's operations are retained and destroyed pursuant to the general principles and regulations laid down in our Company's policies and procedures on retention and destruction, which are drafted in accordance with primarily, the Constitution, and the LPDD, the Regulation on the Deletion, Destruction and Anonymization of Personal Data and other applicable legislation.

Within this scope, if all of the aforementioned personal data processing conditions cease to exist, your personal data will be destructed accordingly. Your personal data will then be continued to be processed during the statutory limitation periods following the finalization of your request(s) / complaint(s). Please see section 6 of this Privacy Notice for your requests concerning the destruction of your personal data.

6. Your Rights under the LPPD

Pursuant to article 11 of the LPPD, you possess the following rights, as a data subject:

- being informed of whether your personal data are processed by our Company or not;
- requesting information thereon if your personal data have been processed;
- being informed of the purpose for the processing of your personal data and whether such data were used in conformity with such purpose or not;
- knowing the third parties in Turkey or abroad to whom/which personal data are transferred;
- requesting the rectification of incomplete or inaccurate personal data which were processed and the notification, of the operation carried out within this scope, to third parties to whom/which personal data were transferred;
- requesting the deletion or destruction of personal data despite the processing in accordance with the law and other applicable legal provisions, once the reasons necessitating the processing cease to exist, and within this scope, if the personal data were processed incompletely and inaccurately, the notification, of the operation carried out within this scope, to third parties to whom/which personal data were transferred;
- objecting to any outcomes to your detriment by means of the analysis of the processed data exclusively through automated means;
- claiming the compensation of your damages, in case you incur any damages due to the unlawful processing of personal data.

You may submit your application regarding your aforementioned rights, in accordance with the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller (in writing or electronically, via registered electronic mail (KEP) address, signed with secure electronic signature or mobile signature, or via your e-mail address which had previously been notified to our Company and which is recorded in our system - along with the information / documentation* verifying your identity in order to enable our Company to confirm your status as an actual right-holder/beneficiary (e.g. Turkish ID number or passport number for citizens of other countries, residential address / workplace address for notification/service, mobile phone / landline /facsimile number, e-mail address) through the channels which are indicated in the applicable legislation, in accordance with the procedures and principles which are laid down in the applicable legislation, particularly via the e-mail address of KVKKIRTIBAT@bilimilac.com. Your application will be concluded free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of your request; however, in case the transaction requires an additional cost, you may be charged according to the tariff determined by the Personal Data Protection Board.

* Please note that no special categories of personal data (e.g. religion or blood type information) should be included in the said documentation.