

BİLİM İLAÇ SANAYİİ VE TİCARET ANONİM ŞİRKETİ
PRIVACY NOTICE ON RELATIONS WITH HEALTHCARE PROFESSIONALS

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 Relations with Healthcare Professionals (the “**Privacy Notice**”).

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 within the framework of your relationship with our Company. 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 printed forms (e.g. value transfer form, congress attendance documents), entrance to our Company’s headquarters, our Company’s websites, our medical representatives, your websites and/or other channels where your personal data which are made public or the databases including such data, open access internet resources, request / complaint platforms, application systems used in medical representation processes, call center, e-mail, facsimile and social media platforms 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 fulfillment of the statutory obligations including the necessary reporting to the Turkish Ministry of Health in accordance with the applicable legal regulations, particularly the regulations on the promotion of healthcare, pharmaceutical, medicinal products for human use, which are applicable to the Company; the management of legal and consultancy affairs including the conducting of the disputes to which the Company is a party and/or in which the Company is involved (e.g. lawsuits, execution proceedings, mediation); the satisfaction by our Company of the conditions laid down in the applicable legislation, particularly the Regulation on the Promotional Activities of Medicinal Products for Human Use and the Application Guidelines on Scientific Meetings and Product Promotion Meetings, which are enacted thereupon, and the management of product meetings which are organized for the promotion of the products; the management of the protection of public health; the management of information and prevention activities (e.g. the provision of information on the medical – scientific properties of the

products, the systematic monitoring of the adverse reactions and benefit / risk balances in order to ensure a safe use of the products, the follow up of the quality of products and the investigation of the products which are defective or which may be defective and the recall thereof from the market – if and when so deemed as necessary); the management of communication activities within the scope of the information, prevention and/or promotional activities; the planning and materialization of visits and/or other activities; the performance of promotional activities concerning the products and/or services; the development of products and/or services; the management of quality standards procedures including product / service / process improvement processes; the management of satisfaction measurements; the identification of the requirements/needs for public health; the conducting of request / complaint management activities, and the management of analysis of usage habits, trends, reactions, satisfaction and loyalty in this regard; the planning and conducting of market research activities; the management of performance ratings of medical representatives; the management of samples and promotions; the organization of events such as online and/or face-to-face congresses / meetings / trainings / slide presentations etc., and the information/notification of the public institutions and organizations, particularly the Turkish Ministry of Health in this regard; the management of organization processes with the suppliers, particularly the bureaus, agencies, events companies from which support will be received for the relevant organizations; the management of the determination of commercial and administrative policies and promotional and sales strategies concerning the services to be offered within the scope of frequency, segmentation and other variables; the conducting of emergency management processes; the management of audits and internal audits; the conducting of ethics activities; the conducting of communication activities including mandatory communication; the conducting and inspection of business activities; the conducting of strategic planning activities; the conducting of storage and archiving activities and the conducting of information security processes; and the purposes for and the legal basis for the processing of your personal data are thoroughly explained herein below.

Personal Data Categories	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) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) 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; (iii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) 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 Emergency Management Processes; • Attainment / Monitoring / Evaluation / Reporting of Adverse Reactions; • Conducting of Information Security Processes; • Conducting of Audit / Ethics Activities;

	<ul style="list-style-type: none"> • Conducting of Training Activities; • Conducting of Authorizations for Access; • Conducting of Activities in accordance with the Legislation; • Carrying out of Company / Products / Services Loyalty Processes; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Protection of Public Health; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Conducting of Contractual Processes; • Conducting of Sponsorship Activities; • Conducting of Strategic Planning Activities; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>Your personal data within this category are also processed, on the basis of the personal data processing condition (legal ground) of the existence of explicit consent, as stipulated in article 5(1) of the LPPD (if so given), as limited with promotional / marketing and communication processes, and for the following purposes:</p> <ul style="list-style-type: none"> • Carrying out of Company / Products / Services Loyalty Processes; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Conducting of Marketing Analysis Studies; • Carrying out of Advertisement / Campaign / Promotions Processes; • Conducting of Product / Service Promotion Processes; • Conducting of Product / Service Marketing Processes.
<p>Contact Details Data</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</p>

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:

- Conducting of Emergency Management Processes;
- Attainment / Monitoring / Evaluation / Reporting of Adverse Reactions;
- Conducting of Information Security Processes;
- Conducting of Audit / Ethics Activities;
- Conducting of Training Activities;
- Conducting of Authorizations for Access;
- Conducting of Activities in accordance with the Legislation;
- Carrying out of Company / Products / Services Loyalty Processes;
- Follow-up and Conducting of Legal Affairs;
- Carrying out of Internal Audit / Investigation / Intelligence Activities;
- Conducting of Communication Activities;
- Conducting / Inspection of Business Activities;
- Protection of Public Health;
- Conducting of Customer Relations Management Processes;
- Conducting of Activities Intended for Customer Satisfaction;
- Organization and Event Management;
- Conducting of Storage and Archiving Activities;
- Conducting of Contractual Processes;
- Conducting of Sponsorship Activities;
- Conducting of Strategic Planning Activities;
- Follow-up of Requests / Complaints;
- Furnishing of Information to Authorized Individuals, Institutions and Organizations.

Your personal data within this category are also processed, on the basis of the personal data processing condition (legal ground) of the existence of explicit consent, as stipulated in article 5(1) of the LPPD (if so given), as limited with promotional / marketing and communication processes, and for the following purposes:

- Carrying out of Company / Products / Services Loyalty Processes;
- Conducting of Communication Activities;
- Conducting / Inspection of Business Activities;
- Organization and Event Management;
- Conducting of Storage and Archiving Activities;
- Conducting of Marketing Analysis Studies;
- Carrying out of Advertisement / Campaign / Promotions Processes;
- Conducting of Product / Service Promotion Processes;
- Conducting of Product / Service Marketing Processes.

<p>Professional Experience Data</p>	<p>Work</p> <p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) 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"> • Attainment / Monitoring / Evaluation / Reporting of Adverse Reactions; • Conducting of Audit / Ethics Activities; • Conducting of Training Activities; • Conducting of Activities in accordance with the Legislation; • Carrying out of Company / Products / Services Loyalty Processes; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Protection of Public Health; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Conducting of Sponsorship Activities; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>Your personal data within this category are also processed, on the basis of the personal data processing condition (legal ground) of the existence of explicit consent, as stipulated in article 5(1) of the LPPD (if so given), as limited with promotional / marketing and communication processes, and for the following purposes:</p> <ul style="list-style-type: none"> • Carrying out of Company / Products / Services Loyalty Processes; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Conducting of Marketing Analysis Studies; • Carrying out of Advertisement / Campaign / Promotions Processes; • Conducting of Product / Service Promotion Processes; • Conducting of Product / Service Marketing Processes.
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<p>Marketing Data</p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (ii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iii) 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; • 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; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>Your personal data within this category are also processed, on the basis of the personal data processing condition (legal ground) of the existence of explicit consent, as stipulated in article 5(1) of the LPPD (if so given), as limited with promotional / marketing and communication processes, and for the following purposes:</p> <ul style="list-style-type: none"> • Carrying out of Company / Products / Services Loyalty Processes; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Conducting of Marketing Analysis Studies; • Carrying out of Advertisement / Campaign / Promotions Processes; • Conducting of Product / Service Promotion Processes; • Conducting of Product / Service Marketing Processes.
<p>Legal Action Data</p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (ii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iii) 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; • 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; • Furnishing of Information to Authorized Individuals, Institutions and Organizations.
<p>Visual and Audio Recording Data</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"> • Attainment / Monitoring / Evaluation / Reporting of Adverse Reactions; • Conducting of Information Security Processes; • Conducting of Audit / Ethics Activities; • Conducting of Training Activities; • Conducting of Activities in accordance with the Legislation; • Carrying out of Company / Products / Services Loyalty Processes; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Protection of Public Health; • Conducting of Customer Relations Management Processes; • Conducting of Activities Intended for Customer Satisfaction; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Follow-up of Requests / Complaints; • Furnishing of Information to Authorized Individuals, Institutions and Organizations.

	<p>Your personal data within this category are also processed, on the basis of the personal data processing condition (legal ground) of the existence of explicit consent, as stipulated in article 5(1) of the LPPD (if so given), as limited with promotional / marketing and communication processes, and for the following purposes:</p> <ul style="list-style-type: none"> • Carrying out of Company / Products / Services Loyalty Processes; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Organization and Event Management; • Conducting of Storage and Archiving Activities; • Conducting of Marketing Analysis Studies; • Carrying out of Advertisement / Campaign / Promotions Processes; • Conducting of Product / Service Promotion Processes; • Conducting of Product / Service Marketing Processes.
<p>Processing/Transaction Security Data</p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (ii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iii) 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 Authorizations for Access; • 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; • Conducting of Storage and Archiving Activities; • Ensuring the Security of the Data Controller's Operations; • Furnishing of Information to Authorized Individuals, Institutions and Organizations.
<p>Request / Complaint / Suggestion Data</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</p>

	<p>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">• Attainment / Monitoring / Evaluation / Reporting of Adverse Reactions;• Conducting of Information Security Processes;• Conducting of Audit / Ethics Activities;• Conducting of Activities in accordance with the Legislation;• 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;• Protection of Public Health;• Conducting of Customer Relations Management Processes;• Conducting of Activities Intended for Customer Satisfaction;• Conducting of Storage and Archiving Activities;• Follow-up of Requests / Complaints;• Furnishing of Information to Authorized Individuals, Institutions and Organizations.
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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. printing and distribution service providers, events and organization management service providers, postal (parcel) / mail / courier service providers, information technology service providers, legal / tax / auditing service providers) located in Turkey and/or abroad, as limited with the identification, contact, professional work experience, marketing, legal action, visual and audio, 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 **social media platforms, other press / broadcasting organizations** located in Turkey and/or abroad, and **third parties to which/whom such contents are communicated / made available/accessible through social media platforms, invitations, magazines, brochures, internal / external publications, web sites and other similar channels**, located in Turkey and/or abroad, as limited with the identification, contact, professional work experience, marketing, visual and audio personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to ensure the improvement of our Company's corporate identity, recognition/repute and value, the creation of corporate promotions and content, the planning and/or materialization of communication activities, the planning and/or materialization of sweepstakes, competitions and events, the announcement of results of sweepstakes / competitions, the creation and publication/posting of interviews and other contents, the formation of memberships over the social media platforms or the realization of posting function on social media platforms;
- to our **group companies including our Company's affiliates** located in Turkey and/or abroad, as limited with the identification, contact, professional work experience, marketing, legal action, visual and audio, 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, professional work experience, marketing, legal action, visual and audio, 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 the transfer of the activities conducted within the scope of the relations with healthcare professionals – in case of any structural change; and
- to the **authorized public institutions and organizations (e.g. courts, tax offices, İleti Yönetim Sistemi A.Ş. (Message Management System Joint Stock Company))** in Turkey and/or abroad, as limited with the identification, contact, professional work experience, marketing, legal action, visual and audio, 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. Your personal data which are processed on the basis of the requirement of the attainment of explicit consent for personal data processing will be destroyed at the first destruction period following the revocation of your explicit consent. 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.