

BİLİM İLAÇ SANAYİİ VE TİCARET ANONİM ŞİRKETİ
PRIVACY NOTICE ON THE PROSPECTIVE DISABLED EMPLOYEE RECRUITMENT 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 the Prospective Disabled Employee Recruitment Processes (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 ensuring the security of our Company’s premises. 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 (e.g. job application form, hiring tests), face-to-face and/or online interviews, call center line, phone, facsimile, cargo/mail, e-mail, online meeting / communication platforms, various career / human resources platforms, professional human resources intermediaries (head-hunting companies), career offices, information desks at our Company’s headquarters and other premises and integrated systems with authorized public institutions 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

A. In Terms of the Recruitment Processes

Your personal data categories which are processed within the scope of the collection, evaluation and finalization of applications from prospective disabled employees (candidates) pursuant to article 30 of the Labor Code No. 4857; the conducting of face-to-face and/or online recruitment interviews / examinations and reference checks; the management of incentive programs benefited / to be benefited by our Company; the retention and evaluation of the curricula vitae for potential job opportunities concerning other existing and/or future vacancies at our Company and/or group companies; the management of recruitment and job offer processes; the management of audits and internal audits; 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); and the management of

communication, audit and reporting and storage and archiving processes within the scope of compliance with the policies and procedures of our group companies, and the purposes for and the legal basis for the processing of your personal data are thoroughly explained herein below.

***** Note to Prospective Employees (Candidates):** *No special categories of personal data (e.g. association / foundation / trade union memberships) should be included in your curriculum vitae to be submitted to our Company through the aforementioned channels.*

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
<p>Identification 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"> • Conducting of Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Carrying out 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; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>In addition, your personal data within this category are processed within the scope of the retention and evaluation of your curriculum vitae for potential job opportunities concerning different existing and/or future vacancies at our Company and/or group companies, other than the position for which you applied, 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), and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Selection and Placement of Prospective Employees / Interns / Students;

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
	<ul style="list-style-type: none"> • Conducting of Prospective Employee Application Processes; • Conducting of Communication Activities; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities.
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 Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Carrying out 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; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>In addition, your personal data within this category are processed within the scope of the retention and evaluation of your curriculum vitae for potential job opportunities concerning different existing and/or future vacancies at our Company and/or group companies, other than the position for which you applied, 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), and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Conducting of Communication Activities;

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
	<ul style="list-style-type: none"> • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities.
Visual and Audio Recording 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 Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Carrying out 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; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>In addition, your personal data within this category are processed within the scope of the retention and evaluation of your curriculum vitae for potential job opportunities concerning different existing and/or future vacancies at our Company and/or group companies, other than the position for which you applied, 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), and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Conducting of Communication Activities; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities;

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
<p>Professional Work Experience Data</p>	<ul style="list-style-type: none"> • Conducting of Storage and Archiving Activities. <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 Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Carrying out 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; • Planning of Human Resources Processes; • Conducting of Communication Activities; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations. <p>In addition, your personal data within this category are processed within the scope of the retention and evaluation of your curriculum vitae for potential job opportunities concerning different existing and/or future vacancies at our Company and/or group companies, other than the position for which you applied, 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), and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Conducting of Communication Activities; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities.

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
<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) 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"> • Carrying out 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; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations.
<p>Special Categories of Personal Data <i>(Our Company’s fundamental principle is the non-processing of special categories of personal data, except for statutory requirements, for the purpose of compliance by our Company with the general principles laid down in the LPPD, particularly the principle of data minimization. However, your health information (e.g. the state / degree of disability) may be processed, on the basis of your explicit consent, if such information are disclosed in your curriculum vitae within the scope of recruitment of disabled persons as per</i></p>	<p>Your health information, as limited with your disability shared / to be shared in your curriculum vitae are processed within the scope of (i) the collection, evaluation and finalization of the prospective disabled employee applications pursuant to article 30 of the Labor Code No. 4857; (ii) the conducting of face-to-face and/or online recruitment interviews; and (iii) the retention and evaluation of your for potential job opportunities concerning other existing and/or future vacancies at our Company and/or group companies, on the basis of the personal data processing condition (legal ground) of the existence of explicit consent, as stipulated in article 6(2) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> • Conducting of Selection and Placement of Prospective Employees / Interns / Students; • Conducting of Prospective Employee Application Processes; • Carrying out of Audit / Ethics Activities; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Planning of Human Resources Processes; • Conducting / Inspection of Business Activities; • Conducting of Storage and Archiving Activities.

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
<i>article 30 of the Labor Code No. 4857.)</i>	*** NB: The processing of your special categories of personal data pursuant to the exemptions to the LPPD, as listed in article 28 thereof, and their transfer within this scope are not subject to the legal condition of the existence of explicit consent.

B. In Terms of Reference Checking Processes

Your personal data categories which are processed within the scope of the conducting of reference checks; the management of audits and internal audits; 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); and the management of communication, audit and reporting and storage and archiving processes within the scope of compliance with the policies and procedures of our group companies, 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) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (ii) 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"> • Carrying out of Audit / Ethics Activities; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Planning of Human Resources Processes; • Conducting of Storage and Archiving Activities; • 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) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (ii) 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"> • Carrying out of Audit / Ethics Activities; • Follow-up and Conducting of Legal Affairs;

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
	<ul style="list-style-type: none"> • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Planning of Human Resources Processes; • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations.
<p>Professional Work Experience Data (Such data are processed as limited with the previous employer, title, duty and position details.)</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 establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (ii) 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"> • Carrying out of Audit / Ethics Activities; • Follow-up and Conducting of Legal Affairs; • Carrying out of Internal Audit / Investigation / Intelligence Activities; • Conducting of Communication Activities; • Planning of Human Resources Processes; • Conducting of Storage and Archiving Activities; • 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. human resources legal consultants, information technology and data hosting service providers) located in Turkey and/or abroad, as limited with the identification, contact, visual and audio, professional work experience and legal action and health information 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;
- to **online meeting / communication platforms** located in Turkey and/or abroad, as limited with the identification, contact, visual and audio and professional work experience personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to enable the conducting of online interviews within the scope of recruitment processes;

- to our **group companies including our Company's affiliates** located in Turkey, as limited with the identification, contact, visual and audio, professional work experience and legal action personal data categories and despite all warnings issued by our Company, if communicated within the scope of your curriculum vitae – association / foundation memberships and health information, 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 **your references which you expressly provided to our Company and for which you have given approval** located in Turkey and/or abroad, as limited with the identification and professional work experience personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to enable the conducting of reference checks; and
- to the **authorized public institutions and organizations** (e.g. courts, Turkish Employment Agency) located in Turkey, as limited with the identification, contact, visual and audio and legal action personal data categories and despite all warnings issued by our Company, if communicated within the scope of your curriculum vitae - association / foundation membership and health information, for the purposes as specified hereinabove for each data category, and particularly, in order to fulfill our Company's statutory obligations, the benefiting from and availing of the incentives for recruitment and other rights 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 destroyed accordingly. If you are recruited, your personal data which were disclosed in your job application will then be continued to be processed during the term of your employment contract and the subsequent statutory limitation periods, and if you are not recruited and you do not give explicit consent, your personal data will be destroyed at the first destruction period following the expiry of the probation period. However, if you give explicit consent, your personal background information will be continued to be processed for 2 (two) years following the sharing thereof with our Company for the purpose of the retention and evaluation of your curriculum vitae for potential job opportunities concerning other existing and/or future vacancies at our Company and/or our group companies, and 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.