

BİLİM İLAÇ SANAYİİ VE TİCARET ANONİM ŞİRKETİ
PRIVACY NOTICE ON THE RETENTION OF INTERNET ACCESS RECORDS

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 Retention of Internet Access Records (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 access to the internet. 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 electronic environments, including the visitor internet network, 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 conducting of our Company’s operations in compliance with the legal regulations, in particular the Law No. 5651 on the Regulation of Broadcasts via the Internet and the Prevention of Crimes Committed through such Broadcasts and other secondary legislation; the combatting of crimes committed on the internet; the management of visitor internet access records; the management of audits and internal audits, the management of storage and archiving activities; the management of communication, audit and reporting within the scope of compliance with the policies and procedures of our group companies; 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 information security management processes, and the purposes for and the legal basis for the processing and transfer of your referred personal data are thoroughly explained herein below.

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
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) 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 Information Security Processes; • Carrying out 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; • 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 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; • Carrying out 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;

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
	<ul style="list-style-type: none"> • Conducting of Storage and Archiving Activities; • Furnishing of Information to Authorized Individuals, Institutions and Organizations.
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 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; • Carrying out 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; • 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) 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"> • Conducting of Information Security Processes; • Carrying out 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;

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
	<ul style="list-style-type: none"> Furnishing of Information to Authorized Individuals, Institutions and Organizations.

4. The Domestic 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 article 8 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** located in Turkey (incl. our group companies in the capacity of/acting as a supplier), as limited with the identification, contact, processing/transaction security and legal action 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, as limited with the identification, contact, processing/transaction security and legal action 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; and
- to the **authorized public institutions and organizations** in Turkey, as limited with the identification, contact, processing/transaction security and legal action 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 personal data processing conditions stipulated in Article 5 of the LPPD cease to exist, your personal data will be destroyed accordingly. Your personal data will then be continued to be processed during the statutory limitation periods pertaining to the specific process. 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.