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## PRODUCT USER CLARIFICATION TEXT

As IFL Pharma İlaç Sanayi Ve Ticaret Anonim Şirketi (İFL Pharma Pharmaceutical Industry and Trade Inc.), your personal data and privacy are extremely important to us. In this context, we respect your personal data with sensitivity. Within the scope of the stated sensitivities, none of your data that is not legally mandatory is processed by our Company.

In our capacity as data controller, within the scope of our legal relationship with you, we hereby inform you that your personal data will be processed within the framework of the purpose that requires their processing and in connection with this purpose, in a limited and measured manner, that the personal data you have notified to our Company will be recorded, stored, preserved by maintaining the accuracy and the most up-to-date form as reported, that this personal data may be processed in the manner specified in Law No. 6698 for the purpose, that it will be shared with third parties, that your data will be destroyed following the disappearance of the reason for processing and the expiration of the periods stipulated for storage in the relevant laws.

### **1. METHOD OF COLLECTING PERSONAL DATA :**

Within the scope of the Product User Contract (CONTRACT) you have signed with IFL PHARMA, your personal data subject to the contract is collected using non-automatic methods by the method of transmission to IFL PHARMA by you based on your explicit consent.

### **2. PERSONAL DATA COLLECTED :**

Within the scope of the CONTRACT, the name and surname of the relevant person, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photographs and videos, the health data of the relevant person regarding the pre-use and post-use of the products offered by the COMPANY for human health are collected.

### **3. LEGAL REASONS AND PURPOSES OF PERSONAL DATA PROCESSING:**

Personal data transmitted to IFL PHARMA within the scope of the CONTRACT are processed

- a. In order to advertise and promote İFL PHARMA and its sub-brands and products and services to third parties and to increase the recognition level before third parties,
  - i. Pursuant to Article 5/1 of the Law, based on explicit consent,
    - Regarding the use of the products offered by the COMPANY for human health, the data set consisting of the image of the relevant person in the photographs and videos, the health data of the relevant person before and after use, through the social media accounts managed by İFL PHARMA on social media platforms and through the catalogs to be printed by the COMPANY to be used domestically and abroad,

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- ii. Within the scope of Article 5/2-c of the Law, based on the legal reason that it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
  - Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,
- b. To be able to defend the legal rights of IFL PHARMA and to manage the clarification processes with explicit consent,
  - i. Within the scope of Article 5/2-e of the Law, based on the legal reason that data processing is mandatory for the establishment, exercise or protection of a right and that it is mandatory for the data controller to fulfill its legal obligation,
    - Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,

#### **4. TRANSFER OF PERSONAL DATA:**

Personal data transmitted to IFL PHARMA within the scope of the CONTRACT can be transferred

- a. In order to advertise and promote IFL PHARMA and its sub-brands and products and services to third parties and to increase the recognition level before third parties,
  - i. Based on explicit consent pursuant to Article 5/1 of the Law, the data set consisting of the health data of the relevant person regarding the use of the products offered by the COMPANY for human health, the image of the relevant person in the photographs and videos, before and after use,
  - ii. Within the scope of Article 5/2-c of the Law, provided that it is directly related to the establishment or performance of a contract, based on the legal reason that it is necessary to process the personal data of the parties to the contract, Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,
    - to companies providing social media services at home and abroad,
    - to supplier companies that provide infrastructure in the field of information services,
    - to business partners providing services for the execution of advertising and promotional activities,
- b. Based on the legal reason that data processing is mandatory for the establishment, exercise or protection of a right pursuant to Article 5/2-e of the Law and that it is mandatory for the data controller to fulfill its legal obligation pursuant to Article 5/2-ç of the Law,

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- i. Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,
  - to lawyers, notaries,
  - to regulatory and supervisory institutions and courts and prosecutors' offices authorized to request your personal data,

### **DATA CONTROLLER:**

Within the scope of these clarification texts, the data controller is İFL PHARMA İLAÇ SANAYİ VE TİCARET ANONİM ŞİRKETİ(İFL Pharma Pharmaceutical Industry and Trade Inc.), Bahçelievler Mah. 323/1 Cad. located in Bahçelievler Mah. 323/1 Cad. C Blok Gazi Üniversitesi Teknokent Binası No: 10/50c İç Kapı No: 108 Gölbaşı / Ankara, registered with Ankara Trade Registry Office with the registration number 462411, Gölbaşı TO - tax no 4701260975 and 0470126097500001 mersis number.

### **YOUR RIGHTS LISTED IN ARTICLE 11 OF THE LAW NO. 6698:**

As the relevant person, the data controller from our Company; you have right

- To know whether your personal data have been processed or not,
- To request information regarding the personal data if they are processed,
- To learn the purpose of processing of your personal data and whether data are used in accordance with their purpose,
- To know the third parties in the country or abroad to whom your personal data have been transferred,
- To request correction of personal data if it is incomplete or improperly processed, and requesting that third parties to be notified of the processing carried out in this context,
- Although it has been processed in accordance with the provisions of Law No. 6698 and other relevant legislation, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To object to the emergence of a result to your detriment by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, to request compensation for the damage

You can enforce your rights in question,

- i. by coming to our company at Bahçelievler Mah. Bahçelievler Mah. 323/1 Cad. Gazi University Teknokent Binası No: 10/50c İç Kapı No: 108 Gölbaşı / Ankara in person or by registered mail with return receipt requested by registered mail,

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- ii. In order to determine your identity and not to provide information to false or unauthorized persons, they can make requests by submitting your requests through a notary public,
- iii. by using your e-mail address previously notified to our Company by you and registered in our system, by sending an e-mail to our address [kvkk@ifl.com.tr](mailto:kvkk@ifl.com.tr),
- iv. by sending an e-mail to our Company's registered e-mail address [iflpharma@hs01.kep.tr](mailto:iflpharma@hs01.kep.tr) via your own KEP address,
- v. by ensuring that your identity is confirmed.

In accordance with Article 13 of the Law, our Company will finalize the applications and requests within 30 (thirty) days at the latest, depending on the nature of the request. If the transaction requires cost, the tariff determined by the Personal Data Protection Board will be applied. If the request is rejected, the reason(s) for rejection shall be justified in writing or electronically.

#### **CONCEPTS AND ABBREVIATIONS IN THESE TEXTS:**

**IFL PHARMA / COMPANY:** IFL Pharma İlaç Sanayi Ve Ticaret Anonim Şirketi (İFL Pharma Pharmaceutical Industry and Trade Inc.)

**Personal Data** : Any information relating to an identified or identifiable natural person,

**User** : A real person whose personal data is processed by visiting/using the website and who is deemed to be a relevant person within the scope of the Law;

**Data Controller** : IFL PHARMA, which determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system,

**Processing of Personal Data:** Any operation performed on personal data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system,

**Law** : Law No. 6698 on the Protection of Personal Data,

**Explicit Consent** : Consent for the processing of personal data, regarding a specific subject, based on information and expressed with free will,

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