

# **CRANIOCATCH MEDICAL AND DENTAL INFORMATION TECHNOLOGIES INC. INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA**

## **DATA CONTROLLER**

- Personal data belonging to you is processed by CRANIOCATCH MEDICAL AND DENTAL INFORMATION TECHNOLOGIES INC. (“Craniocatch”) as the data controller through the Portal, which provides services via the domain [www.cranio catch.com](http://www.cranio catch.com) and the subdomains [app.cranio catch.com](http://app.cranio catch.com) and [edu.cranio catch.com](http://edu.cranio catch.com) (the Portal encompasses all websites, mobile sites, and mobile applications).
- This information notice has been prepared in accordance with Article 10 of the Law No. 6698 on the Protection of Personal Data (“Law”) and the “Communiqué on Procedures and Principles to be Complied with in Fulfilling the Obligation to Inform” to inform you about which of your personal data is processed, for which purposes, how and on what grounds it is processed, with whom it is shared, and how long it is retained.
- It is also important for you to review the “Terms of Use,” “Personal Data Protection Policy,” “Cookie Policy” texts, and the provisions and conditions of the “Membership Agreement” available on the Portal together with this information notice.

## **PROCESSED PERSONAL DATA**

- In the case of real persons registering as members on the Portal, the following personal data is processed: identity information (name, surname, identification number); contact information (phone number, email address, address); and commercial information (tax number, company name).
- When the Portal is visited, the IP address information of all visitors, whether registered or not, as well as internet access and exit logs, are processed for security purposes.
- If a demo request is made after visiting the Portal, the following information is processed: name, surname, phone number, and email address; additionally, when the contact form is filled out, institution information and the content of the message are also processed.
- When our facility is physically visited, visual data is processed through security cameras.
- Payment information of individuals is processed and stored by an Authorized Payment Institution established under Law No. 6493. Craniocatch Inc. does not store card information or any other payment information under its own management.
- Additionally, cookies are used on the Portal's website, and you can review our Cookie Policy for personal data processed through cookies.

- Real or legal persons purchasing the Craniocatch software act as data controllers regarding the personal data they process through the Portal. In this case, Craniocatch acts as a data processor and ensures the protection of the personal data it processes through appropriate administrative and technical measures, and does not use the processed personal data for purposes other than those for which it was obtained.
- You can also review our Personal Data Protection Policy regarding this matter.

### **PURPOSES OF PROCESSING PERSONAL DATA**

The processing of personal data is limited to the following purposes:

- Management of customer relationships regarding the products and services offered by Craniocatch,
- Monitoring of requests and complaints,
- Management of communication activities,
- Meeting contractual requirements,
- Management of financial transactions,
- Management of information security processes,
- Providing information to authorized persons, institutions, and organizations when required by legislation.

### **LEGAL GROUNDS FOR PROCESSING PERSONAL DATA**

These personal data are subject to the provisions of Article 5, Paragraph 2 of Law No. 6698.

- (a) if it is explicitly stipulated in laws;
- (c) if processing is necessary for the establishment or performance of a contract, provided it is directly related to the parties of the contract;
- (ç) if it is mandatory for the data controller to fulfill a legal obligation;
- (e) if processing is mandatory for the establishment, exercise, or protection of a right;
- (f) if it is necessary for the legitimate interests of the data controller, provided it does not harm the fundamental rights and freedoms of the data subject.

### **METHOD OF COLLECTING PERSONAL DATA**

- Your personal data is processed partially automatically or automatically through the forms available on the Portal, emails, and other computer technologies based on the legal grounds mentioned above.

## **TRANSFER OF PERSONAL DATA**

- All personal data processed by Craniocatch as the data controller through the Portal are **not shared with third parties** except for relevant public institutions, regulatory and inspection authorities, and judicial authorities upon request.
- The mentioned personal data is **not transferred abroad** in any way. Relevant personal data is stored on servers located within the country.
- All processed personal data is retained for the duration necessary for the purpose for which each data is processed, through the implementation of administrative and technical measures in accordance with the provisions of the KVKK (Law on the Protection of Personal Data).

## **RIGHTS OF DATA SUBJECT**

Within the scope of Article 11 of the Law, which regulates the rights of the data subject, individuals have the right to apply to the data controller regarding their personal data to:

1. Learn whether personal data is being processed,
2. Request information regarding the processed personal data,
3. Learn the purpose of processing personal data and whether they are being used in accordance with that purpose,
4. Know the third parties to whom personal data is transferred, whether domestically or internationally,
5. Request the correction of personal data if it is processed incompletely or inaccurately,
6. Request the deletion or destruction of personal data under the conditions specified in Article 7 of the Law,
7. Request notification of the operations performed under clauses (d) and (e) to third parties to whom personal data has been transferred,
8. Object to the occurrence of a result against themselves by means of exclusively automated systems analyzing the processed personal data,
9. Request compensation for damages in case of being harmed due to unlawful processing of personal data.

## **Regarding the Procedures and Principles for Application to the Data**

### **Controller**

- Data subjects must submit their requests in Turkish.
- Requests can be sent in writing to the data controller's address specified below, either in person, by registered mail with return receipt, or through a notary public.
- Requests can also be submitted electronically via a registered electronic mail (KEP) address with an electronic signature, or using the email address previously notified by the data subject and registered in the data controller's system.

- Applications must include the mandatory elements listed in Article 5, Paragraph 2 of the aforementioned regulation. Otherwise, the applications will not be considered for evaluation.
- Applications received in accordance with the procedures will be responded to as soon as possible, and in any case, within 30 (thirty) days at the latest.

#### **DATA CONTROLLER CONTACT INFORMATION**

**Address:** Büyükdere Mah. Prof. Dr. Nabi Avcı Blv. Teknopark Blok No 4/59 İç Kapı No 108 Odunpazarı/Eskişehir

E-mail : [info@craniocatch.com](mailto:info@craniocatch.com)

KEP : [craniocatch@hs01.kep.tr](mailto:craniocatch@hs01.kep.tr)