

ABDİ İBRAHİM İLAÇ SANAYİ VE TİCARET A.Ş.
PERSONAL DATA PROTECTION AND
PROCESSING POLICY

Version 0.1

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1. INTRODUCTION

1.1. Purpose and Scope of the Policy

The Law on Protection of Personal Data no. 6698 (“the Law”) was made effective as of April 7, 2016, and the Personal Data Protection and Processing Policy (“the Policy”) of Abdi İbrahim İlaç Sanayi ve Ticaret Anonim Şirketi (“Abdi İbrahim” or “the Company”) aims to ensure compliance of Abdi İbrahim İlaç Sanayi ve Ticaret Anonim Şirketi to the Law, and to set out the principles to be followed for the purpose of performance of obligations concerning protection and processing of personal data by the Company.

The Policy specifies the personal data processing requirements and establishes the fundamental principles adopted by the Company to process such personal data. Within this framework, the Policy covers all personal data processing activities performed by the Company within the scope of said Law, as well as all and any personal data processed thereunder, and data subjects thereof.

Issues with regard to processing the personal data of employees of the Company are not covered by the Policy, but regulated as a separate subject in Abdi İbrahim İlaç Sanayi ve Ticaret Anonim Şirketi Personnel Personal Data Protection and Processing Policy. Definitions of the terms used in the Policy are presented in APPENDIX-1 attached hereto.

1.2. Effective Dates and Amendments

The Policy is disclosed by the Company on its website. If and when there is a conflict between the issues discussed in the Policy and the applicable laws and regulations pertaining thereto, particularly the Law mentioned hereinabove, then and in this case, the provisions of the latter shall prevail.

The Company reserves its right to amend the Policy in line with the applicable laws and regulations. Current version of the Policy is available on the website of the Company: www.abdiibrahim.com

2. DATA SUBJECTS, PURPOSES OF DATA PROCESSING, AND DATA CATEGORIES USED FOR PERSONAL DATA PROCESSING ACTIVITIES OF OUR COMPANY

2.1. Data subjects

Within the scope of the Policy, the term ‘data subject’ refers to all and any natural persons personal data of whom are processed by the Company, save for its own employees. Within this framework, data subject categories used are generally as follows:

DATA SUBJECT CATEGORIES		DEFINITION
1.	Customer	Refers to natural persons benefiting from products and services offered by the Company.
2.	Potential Customer	Refers to natural persons showing interest in products and services offered by the Company and having a potential to turn into a customer.
3.	Parties Having an Interest in Health Sector	Refers to all personnel of health sector, including healthcare professionals.

4.	Visitor	Refers to natural persons visiting the Company headquarters, stores, premises and website.
5.	Prospective Personnel	Refers to natural persons who have applied for a job by sending a CV to the Company or using any other means and methods.
6.	Third Parties	Refers to all and any natural persons, excluding data subject categories given hereinabove and the Company's own personnel.

Data subject categories are presented only for general information purposes. It should also be kept in mind that a data subject's not being eligible for insertion in any one of the categories cited above does by no means prejudice to his data subject status as further described in and arising from the Law.

2.2. Purposes of Personal Data Processing

Your personal data and specific personal data may, in accordance with the personal data processing requirements stipulated in the Law and other relevant applicable laws and regulations, be processed by the Company for the following purposes:

MAIN PURPOSES	SUB-PURPOSES
Planning and conduct by the relevant business units of the operational processes aimed at installation and execution of business trading activities performed by the Company	<ol style="list-style-type: none"> 1. To conduct and follow up research and development operations 2. To plan and perform business trading activities 3. To handle corporate communication processes 4. To manage organisations, invitations and events 5. To install and supervise activities aiming at assuring the business continuity 6. To plan and schedule, and assure the feasibility of, information access authorisations granted to parties to a business relationship with our Company 7. To manage corporate sustainability and social responsibility activities 8. To plan, follow up and perform logistic operations
To conduct strategic planning initiatives for commercial and operational activities of the Company	<ol style="list-style-type: none"> 1. To improve and monitor relationships with business partners and suppliers

<p>Planning and performance by business units of the operations need to offer products and services of the Company to target customer base</p>	<ol style="list-style-type: none"> 1. To manage processes for execution and performance of agreements, as well as probable legal claims thereunder 2. To design, develop and perform processes for patients 3. To implement customer relations management activities 4. To plan and conduct processes for collection and assessment of customer requests and complaints
<p>To develop and manage human resources procedures of the Company</p>	<ol style="list-style-type: none"> 1. To plan and handle recruitment processes for interns and students 2. To follow up human resources as and when needed for business activities of our Company
<p>Installation and execution of activities aimed at introduction and promotion of products and services offered by the Company through customization according to preferences and needs of target customer base</p>	<ol style="list-style-type: none"> 1. To design and execute market researches and studies for the products and services offered by our Company 2. To plan and perform activities in such manner to make sure that consumers reap the maximum possible benefit out of the products and services offered by our Company 3. To plan and conduct processes performed with healthcare professionals 4. To handle marketing processes for the products and services offered by our Company
<p>To plan and perform processes destined for legal, technical and commercial safety of both the Company and the related persons involved in a business relationship therewith</p>	<ol style="list-style-type: none"> 1. To plan and perform activities for management of emergencies and contingencies 2. To send all and any notices imposed by the applicable laws and regulations to legally authorised recipients thereof 3. To follow up activities relating to the performance of legal duties and obligations, and manage legal affairs in connection therewith 4. To install and conduct processes for security of premises and facilities of our Company 5. To keep and store records of entrance and exit of the workers of business partners and suppliers into/from the premises of our Company 6. To manage and follow up processes on adverse events 7. To plan and perform processes within the scope of occupational health and safety 8. To keep and follow up records for visitors 9. To plan and perform audit processes 10. To assure that data are accurate and up-to-date by all means 11. To follow up financial risk processes of our Company

2.3. Personal Data Categories

Your personal data categorised hereinbelow may be processed by the Company in accordance with personal data processing requirements of the Law and other relevant applicable laws and regulations pertaining thereto:

PERSONAL DATA CATEGORISATION	DEFINITION
Identity Data	Refers to all and any identity data given about a person in the documents such as driving license, identification card, certificate of residence, passport, lawyer identity card, marriage license.
Communication Data	Refers to information such as telephone number, address and e-mail used to communicate with data subject.
Customer Information	Refers to information collected and generated about target customer base as a result of our business activities and operations performed by our business units therewithin.
Information about Family Members and Relatives	Refers to information about family members and relatives of personal data subjects processed with regard to products and services offered by the Company or with the purpose of protecting legal interests of both the Company and the data subjects.
Customer Transaction Information	Refers to information such as records relating to use of our products and services, as well as instructions and requests to the extent needed for use of the products and services by customers.
Physical Location Security Information	Refers to personal data relating to records and documents such as camera and fingerprint records taken during entrance into physical locations and the time spent therein.
Transaction Security Information	Refers to personal data processed to ensure technical, administrative, legal and commercial security by all means during our business activities.
Financial Data and Information	Refers to personal data processed with regard to information, document and records showing all and any financial results created according to the type of legal relationships between our Company and the relevant personal data subject.
Prospective Personnel Information	Refers to personal data processed with regard to individuals who have applied for a position in our Company, or are treated as prospective personnel in tandem with our Company's needs for human resources, or are presently a party to employment relations with our Company, as per not only customs of trade, but also good faith and honesty rules and principles.
Information on Legal Transactions and Compliance with Laws	Refers to personal data processed for identification and protection of our rights and interests, and for performance of our legal liabilities and repayment of our debts, and for checking compliance with our Company's policies pertaining thereto.
Information on Audits and Inspections	Refers to personal data processed in order to make sure that our Company performs its legal liabilities and complies with its policies.
Specific Personal Data	The term "specific personal data" refers to such data as race, ethnical origin, political thought, philosophical belief, religion, sect or other beliefs, attire and appearance, membership of associations, foundations or unions, health, sexual life, past convictions or security measures of persons, as well as their biometrical and genetic data.

Marketing Information	Refers to personal data processed for marketing of our products and services by customising the same in tandem with use habits, tastes and needs of personal data subject, as well as reports and reviews resulting therefrom.
Information on Request/Complaint Management	Refers to personal data relating to the process of collecting and reviewing all and any requests or complaints addressed to our Company.
Information on Reputation Management	Refers to information collected to protect our Company's commercial reputation, as well as evaluation reports and actions related thereto.
Information on Event Management	Refers to personal data processed to take necessary legal, technical and administrative measures against certain events with the aim of protecting commercial rights and interests of our Company and the relevant rights and interests of our customers.

3. PRINCIPLES AND REQUIREMENTS ON PROCESSING OF PERSONAL DATA

3.1. Principles on Processing of Personal Data

Your personal data are processed by the Company in accordance with the principles on processing of personal data stipulated in Article 4 of the Law. It is obligatory to comply therewith in the course of each and every personal data processing activity:

- **Processing personal data in accordance with the applicable laws and good faith and honesty:** While processing your personal data, the Company acts in compliance with the applicable laws, secondary regulations and general principles of law, and puts emphasis on processing the personal data solely and exclusively for the original purposes of personal data processing, and on taking reasonable expectations of the data subjects into consideration.
- **Accuracy and currency of personal data:** Care should be taken to ensure your personal data processed by the Company is up-to-date, and it is duly controlled in the course of processing activities. Accordingly, data subjects are entitled to request correction or deletion of inaccurate and noncurrent data related to them.
- **Processing personal data for specified, clear and legitimate purposes:** Prior to each and every personal data processing activity, the Company defines the purposes thereof and takes care to ensure that said purposes are not illegal.
- **Personal data being associated with, limited to and proportionate with the purpose of data processing activity:** Data processing activity performed by the Company is limited to personal data necessary for the original data collection purpose and required actions are taken in order not to process personal data non-associated therewith.
- **Personal data being kept only for the period imposed by the applicable laws and regulations or by the purposes of data processing:** Personal data are deleted, destroyed or anonymised after elimination of the original purpose of personal data processing determined by the Company or at the end of the period stipulated by the laws and regulations therefor.

3.2. Requirements on Processing of Personal Data

Your personal data are processed by the Company only upon satisfaction of at least one of the personal data processing conditions and requirements stipulated in Article 5 of the Law. Such conditions and requirements are clarified as follows:

- **When explicit consent of the personal data subject is received**, but other data processing conditions and requirements are not fulfilled: In accordance with the general principles given under title no. 3.1., personal data of the data subject can be processed by the Company providing that the data subject declares its consent by its free will and volition in such manner to leave no room for doubt based on sufficient information about personal data processing activity and solely and only for the subject activity.
- If and when **personal data processing activity is clearly required pursuant to the applicable laws and regulations**: Personal data may be processed by the Company without obtaining an explicit consent of the data subject. In that case, the Company shall process personal data within the frame of applicable regulations.
- **If and when it is absolutely needed to process personal data; however, an explicit consent of the data subject cannot be obtained due to actual impossibility**: Personal data of the data subject who is in a situation making it impossible to declare its own consent or whose consent cannot be verified or validated shall be processed by the Company in the event that it is obligatory to process personal data in order to protect the life or physical integrity of the data subject or a third party.
- **If and when personal data processing activity is directly associated with the execution or performance of an agreement**: Personal data will be processed in the event that it is required to process personal data of parties to an agreement executed or already signed between the data subject and the Company.
- **If and when it is required to process personal data in order to meet data supervisor legal obligations**: Personal data are processed by the Company with an objective of meeting its legal obligations stipulated in the applicable laws and regulations in connection therewith.
- **Data subject's making its own personal data public**: Personal data disclosed and made known to everyone by the data subject itself for any reason whatsoever as a result of publicizing shall be processed by the Company solely and to the extent needed for publicizing purposes even without a prior open consent of the data subject.
- **If and when it is required to process personal data in order to create, use or protect a right**: The Company can process personal data of a data subject without obtaining its explicit consent as per the related requirements.
- **If and when it is mandatory to process data for legitimate interests of the data supervisor on condition that basic rights and freedoms of the data subject are not impaired**: Personal data can be processed by the Company providing the balance between the Company and the data subject is protected. Accordingly, if the Company processes such data based on a legitimate interest, then it should primarily specify and identify its resulting legitimate interest. The Company evaluates possible impacts of personal data processing activity on data subject's rights and freedoms and carries out this activity only if it comes to the conclusion that said balance is maintained and protected.

3.3. Requirements on Processing of Specific Personal Data

In Article 6 of the Law, specific personal data are indicated in a limited number. These specific personal data are race, ethnical origin, political thought, philosophical belief, religion, sect or other beliefs, attire and appearance, membership of associations, foundations or unions, health, sexual life, past convictions or security measures of persons or their biometrical and genetic data.

The Company can process specific personal data in the following situations by ensuring additional actions specified by the Personal Data Protection Board are taken in relation therewith:

- **Processing specific personal data other than health and sexual life:** Such data can be processed only if data subject declares its explicit consent or if and when it is required by the applicable laws and regulations.
- **Personal data on health and sexual life:** Such data can be processed without obtaining an explicit consent of the data subject by persons or authorised institutions and entities under confidentiality obligations solely for the purposes of public health protection, preventive medicine, medical diagnosis, performance of treatment and care services, planning and managing health services and funding.

4. TRANSFER OF PERSONAL DATA

In accordance with additional regulations contemplated in Articles 8 and 9 of the Law and issued by the Personal Data Protection Board, the Company can transfer personal data at home or abroad upon satisfaction of certain conditions precedent stipulated for transfer of personal data as detailed below:

- **Transfer of personal data at home to third parties:** Upon satisfaction of at least one of the data processing conditions and requirements stipulated in Articles 5 and 6 of the Law and defined under the title no. 3 of this Policy and providing that the fundamental principles on data processing requirements are complied with, your personal data can be transferred by the Company.
- **Transfer of personal data abroad to third parties:** Where an explicit consent of the relevant person is not available, upon satisfaction of at least one of the data processing conditions and requirements stipulated in Articles 5 and 6 of the Law and defined under the title no. 3 of this Policy and providing that the fundamental principles on data processing requirements are complied with, your personal data can be transferred abroad by the Company.

If the recipient country is not one of the safe countries to be announced by the Personal Data Protection Board, personal data can be transferred to third parties resident or seated abroad, only upon receipt of a written statement of adequate protection from both the Company and the data supervisor in the relevant jurisdiction, with a prior permission received from the Personal Data Protection Board, and upon satisfaction of at least one of the data processing conditions and requirements stipulated in Articles 5 and 6 of the Law (see: Title 3 of this Policy).

Within the scope of data processing conditions and requirements contemplated both in the general principles and in Articles 8 and 9 of the applicable Law, the Company can transfer data to the parties categorised hereinbelow:

CATEGORY OF PARTIES WITH WHOM DATA ARE SHARED	SCOPE	PURPOSE OF TRANSFER
Business Partner	Refers to parties with whom the Company gets into business partnership while conducting its commercial activities.	To share personal data solely for ensuring that the goals of business partnership are achieved in due course.
Supplier	Refers to parties providing services for continuity of commercial activities of the Company in reliance upon an agreement executed with and in line with the directions of the Company.	Data transfer solely for receipt of services outsourced to the supplier.
Affiliate	Refers to companies that are affiliates of the Company.	To transfer personal data solely for conduct of commercial activities requiring involvement of the affiliates.
Legally Authorised Public Institution	Refers to public institutions and entities legally authorised to receive information and documentation from the Company.	Sharing personal data with the relevant entities and administrations solely for purposes underlying their information requests.
Legally Authorised Private Institution	Refers to private institutions and entities legally authorised to receive information and documentation from the Company.	Sharing personal data with the relevant provide institutions and entities solely for purposes underlying their information requests within the frame of their legal authorization relating thereto.
Universities	State-owned Universities and Foundation Universities	To organise campus events, to promote and introduce our Company in such universities, for clinical researches and for other causes set out by the applicable laws and regulations.

5. INFORMING DATA SUBJECTS AND THEIR RIGHTS THEREOF

According to Article 10 of the Law, data subject must be informed about its processed personal data prior to or at the latest during the process. Under the relevant article, necessary in-house organization structure should be generated to guarantee that data subjects are informed for each and every personal data processing activity performed by the Company as data supervisor. In connection therewith:

- Please review Section 2.2 of this Policy to learn the purpose of processing of your personal data.
- Please review Section 4 of this Policy to learn the parties to whom your personal data are transferred and the reason of transfer.
- Please see Sections 3.2 and 3.3 of this Policy to review requirements on processing of your personal data that can be collected through different channels in physical or

electronic media.

- We accept and declare that you, as the data subject, have the rights listed hereinbelow pursuant to and under Article 11 of the Law:
 - To learn whether your personal data are processed or not,
 - If processed, to request information thereabout,
 - To learn the purpose of processing, and whether your personal data are used in accordance with the original purpose of processing or not,
 - To learn all and any third parties at home and abroad to whom your personal data are transferred,
 - If your personal data are processed incompletely or inaccurately, to request correction or completion of them, and if you use this right, to request that such correction or completion is further notified to third parties to whom your personal data have previously been disclosed,
 - If the original reasons of processing are no longer applicable even though your personal data are processed in accordance with the Law and relevant provisions of other applicable laws and regulations, to request deletion or destruction of your personal data, and if you use this right, to request that such deletion or destruction is further notified to third parties to whom your personal data have previously been disclosed,
 - To raise an objection against the outcome reached against you through analysis of your data exclusively through automatic systems,
 - If you have suffered damages and losses due to your personal data being processed illegally, to claim an indemnity therefor.

You can communicate to our Company your requests with respect to your rights listed hereinabove by filling out the Data Subject Application Form of Abdi İbrahim İlaç Sanayi ve Ticaret Anonim Şirketi available on www.abdiibrahim.com. Your request shall be concluded free of charge as soon as possible and no later than thirty days depending on the type and nature thereof; however, if the process requires further costs, you can be asked to pay additional fees according to the tariff specified by the Personal Data Protection Board.

While evaluating applications, the Company should primarily determine whether the applicant is the real owner of such rights. However, the Company may request further detailed information for better understanding of the application if and when it deems necessary.

The Company communicates its response to the data subject's applications in writing or via electronic media. If an application is rejected, reasons thereof with necessary justifications will be explained to the data subject.

If and when personal data are not obtained directly from the data subject, necessary activities to inform the data subject are performed by the Company (1) within a reasonable period from the moment of receipt of personal data or (2) at the first time of communication if these personal data will be used to communicate with the data subject or (3) at the first time of transfer of personal data at the latest if and when personal data will be transferred.

6. DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA

According to Article 7 of the Law, the Company, ex officio in its own initiative or upon request of the data subject relating thereto, deletes, destructs or anonymises personal data in compliance with the guidelines published by the Authority in the event that reasons of data processing are no longer applicable even if personal data have been processed in accordance with applicable laws and regulations.

7. SCOPE OF THE LAW AND IMPLEMENTATION RESTRICTIONS THEREON

The following cases are not within the scope of the Law:

- Personal data being processed by the natural persons for the activities related completely to themselves or their family members living under the same roof providing that these data are not disclosed to the third parties and obligations under data protection are fulfilled.
- Personal data being processed for official statistics and for purposes such as research, planning and statistics by anonymization.
- Personal data being processed for artistic, historical, literary or scientific purposes or within the scope of freedom of expression if and to the extent national defence and security, public security and order, economic security are not violated and rights of privacy or personal rights are not infringed and no crime is committed.
- Personal data being processed within the scope of preventive, protective and informative operations performed by the public entities and administrations assigned and authorised according to the applicable laws and regulations to maintain national defence and security, public security and order or economic security.
- Personal data being processed by judicial authorities or enforcement services for investigation, prosecution, proceeding or execution purposes.

For the following cases listed hereinbelow, the Company is not obliged to inform the data subjects and the data subjects shall not use the rights contemplated in the Law save for the rights regarding compensation of damages and losses:

- If and when personal data are required to be processed to avoid commitment of a crime or for a criminal investigation.
- When personal data publicised by the data subject itself are processed.
- When personal data are required to be processed, based on the authorisation given according to the applicable laws and regulations, by the public entities and administrations and the professional organizations classified as public entities assigned and authorised in order to perform supervision or regulation duties and for disciplinary proceedings and prosecutions.
- If and when personal data are required to be processed for the reason of protecting economical and financial interests of the Government with relation to budget, taxes and other financial issues.

APPENDIX-1: DEFINITIONS

DEFINITION	
Explicit/Open Consent	Refers to a consent given on a certain issue or matter, and based on concrete information, and declared by free will and volition.
Anonymization	Refers to the process of making personal data non-associable with a particular identified or identifiable natural person by any means or ways whatsoever even by matching of personal data to other data and information.
Personnel	Refers to natural persons employed by the Company.
Prospective Personnel	Refers to natural persons that are not personnel of the Company, but are treated and considered within the status of prospective personnel according to various methods.
Personal health data	Refers to all kinds of personal health data and records with respect to a particular identified or identifiable natural person.
Personal Data	Refers to all kinds of data and information regarding a particular identified or identifiable natural person.
Data subject	Refers to natural persons whose personal data are processed.
Processing of Personal Data	Refers to all kinds of transactions performed on personal data and information, such as acquisition, registration, storage, safeguarding, modification, rearrangement, disclosure, transfer, takeover, making acquirable, classification or prevention of use of personal data by various different ways or methods which are either fully or partially automatic, or are not automatic subject to the condition of being a part of any data recording system.
Law	Refers to the Personal Data Protection Law no. 6698 published in the Official Gazette edition 29677 on April, 7th, 2016.
Specific Personal Data	Refers to such data as race, ethnical origin, political thought, philosophical belief, religion, sect or other beliefs, attire and appearance, membership of associations, foundations or unions, health, sexual life, past convictions or security measures of persons or their biometrical and genetic data.
Policy	This Personal Data Processing and Protection Policy of Abdi İbrahim İlaç Sanayi ve Ticaret Anonim Şirketi
Company / Abdi İbrahim	Abdi İbrahim İlaç Sanayi ve Ticaret Anonim Şirketi
Business Partners	Refers to persons and entities with whom the Company gets into partnership by executing an agreement within the frame of its business activities.
Data subject	Refers to natural persons whose personal data are processed.
Data Processor	Refers to natural and legal persons processing data on behalf of a certain data supervisor based on the authorisation given thereby.
Data Supervisor	Refers to the person defining objectives and means of processing personal data and managing database where data are kept systematically.