



**Service Recipient (Customer)
Clarification Text**

Remed Uluslararası Destek ve Danışmanlık Hizmetleri Ticaret A.Ş. (hereinafter referred to as "AVİTA"), we have prepared this Clarification Text on Processing of Personal Data ("Clarification Text") in order to enlighten the data subjects regarding the processing, storage and transfer of your personal data within the framework of our activities arising from the Personal Data Protection Law No. 6698 ("KVKK") and related legislation and legal regulations.

The Clarification Text shall be valid as of the date of its publication by AVİTA. AVİTA may make changes to the Clarification Text at any time if necessary. The amendments to be made shall become effective immediately upon the publication of the Clarification Text on the website.

Contact Persons: Service Recipient (Customer)

AVİTA EAP "General Processes";

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
01- Identity	-Name, Surname -Age	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints.	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement, 5/2-ç- It is mandatory for the data controller to fulfil its legal obligations. 5/2-e- Data processing is mandatory to establish, exercise or protect a right.	Your identity data is collected via e-mail and voice recording
02- Contact Information	-Email -Telephone number	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints.	Turkish Commercial Code No. 6102, Law No. 6698 on the Protection of Personal Data, 5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement, 5/2-ç- It is mandatory for the data controller to fulfil its legal obligations. 5/2-e- Data processing is mandatory to establish, exercise or protect a right.	Your contact information data is collected via e-mail and voice recording
13- Visual and Audio Records	- Audio Records	Execution of Benefits and Benefits Processes for Employees, Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees, Execution of Goods / Services Production and Operation Processes, Execution of Activities in Accordance with the Legislation, Follow-up and Execution of Legal Affairs, Execution / Supervision of Business Activities, Execution / Supervision of Business Activities, Providing Information to Authorized Persons, Institutions and Organizations, Execution of Contract Processes, Storage and Archive Activities Execution, execution of activities for customer satisfaction, execution of performance evaluation processes.	Law No. 6698 on the Protection of Personal Data 5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement, 5/2-ç- It is mandatory for the data controller to fulfil its legal obligations. 5/2-e- Data processing is mandatory to establish, exercise or protect a right.	Your visual and audio recording data is collected voice recording



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In addition to the personal data specified in the Avita EAP "General Processes" table, the personal data processes received for the service provided;

General Information (Flight Ticket Purchase Process);

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
01- Identity	-TCKN -Date of birth -Passport Number	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Information Security Processes, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints.	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement, 5/2-ç- It is mandatory for the data controller to fulfil its legal obligations. 5/2-e- Data processing is mandatory to establish, exercise or protect a right.	Your identity data is collected via e-mail and voice recording
02- Contact Information	-Address Information	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests/Complaints, Execution of Communication Activities	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement, 5/2-ç- It is mandatory for the data controller to fulfil its legal obligations. 5/2-e- Data processing is mandatory to establish, exercise or protect a right.	Your contact information data is collected via e-mail and voice recording
10 - Finance	-Credit Card Information	Execution of Goods/Services After-Sales Support Services, Execution of Goods/Services Production and Operation Processes	Turkish Commercial Code No. 6102, 5/2-e- Data processing is mandatory to establish, exercise or protect a right. 5/2-f- Data processing is mandatory for the legitimate interests of the data controller, on condition that such processing does not violate the fundamental rights and freedoms of the data subject.	Your financial information is collected through the switchboard system.

General Information (Traffic Insurance Price Information Process);

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
01- Identity	-Identity number -Date of birth	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Information Security Processes, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement, 5/2-ç- It is mandatory for the data controller to fulfil its legal obligations. 5/2-e- Data processing is mandatory to establish, exercise or protect a right.	Your identity data is collected via e-mail and voice recording
26- Other	-Vehicle License Plate -License No.	Execution of Goods / Services Production and Operation Processes, Execution of Contract Processes, Follow-up of Requests / Complaints	Law No. 6698 on the Protection of Personal Data, Road Traffic Law No. 2918,	Your other data is collected via e-



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			<p>5/2-c- Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement,</p> <p>5/2-ç- It is mandatory for the data controller to fulfil its legal obligations.</p> <p>5/2-e- Data processing is mandatory to establish, exercise or protect a right.</p> <p>5/2-f- Data processing is mandatory for the legitimate interests of the data controller, on condition that such processing does not violate the fundamental rights and freedoms of the data subject.</p>	mail and voice recording
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General Information (Home Insurance Price Information Process):

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
01- Identity	-TCKN -Date of birth	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Information Security Processes, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, 5/2-ç- It is mandatory for the data controller to fulfill its legal obligation, 5/2-e- Data processing is mandatory for the establishment, exercise or protection of a right.	Your identity data is collected via e-mail and voice recording
02- Contact Information	-Address Information	Execution of Goods/Services After-Sales Support Services, Execution of Contract Processes, Follow-up of Requests/Complaints, Execution of Communication Activities	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, 5/2-e- Data processing is mandatory for the establishment, exercise or protection of a right.	Your contact information data is collected via e-mail and voice recording

General Information (Travel Insurance Price Information Process):

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
01- Identity	-TCKN -Date of birth	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Information Security Processes, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, 5/2-e- Data processing is mandatory for the establishment, exercise or protection of a right.	Your identity data is collected via e-mail and voice recording



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Legal Information Process;

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
01- Identity	-Date of birth -Signature	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Information Security Processes, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Contract Processes, Follow-up of Requests / Complaints	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Law No. 6698 on the Protection of Personal Data, 5/2-c- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, 5/2-ç- It is mandatory for the data controller to fulfill its legal obligation, 5/2-e- Data processing is mandatory for the establishment, exercise or protection of a right.	Your identity data is collected via e-mail and voice recording
02- Contact Information	-Address Information	Execution of Goods/Services After-Sales Support Services, Execution of Contract Processes, Follow-up of Requests/Complaints, Execution of Communication Activities	Turkish Commercial Code No. 6102, Law No. 6698 on the Protection of Personal Data, 5/2-c- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, 5/2-e- Data processing is mandatory for the establishment, exercise or protection of a right.	Your contact information data is collected via e-mail and voice recording
06- Legal Action	-Information in Correspondence with Judicial Authorities, Information in the Case File, Warnings and Other Documents/Documents Submitted by the Client	Execution of Goods/Services After-Sales Support Services, Execution of Contract Processes, Follow-up of Requests/Complaints	Law No. 6698 on the Protection of Personal Data 5/2-c- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, 5/2-ç- It is mandatory for the data controller to fulfill its legal obligation, 5/2-e- Data processing is mandatory for the establishment, exercise or protection of a right.	Your legal transaction information data is collected via e-mail and voice recording

Waist, Neck, Back Pain and Office Ergonomics, Psychological Support, Medical Counseling, Newborn Care Information and Healthy Nutrition Counseling Processes;

Data Category	Processed Personal data	Purposes of Processing Personal Data	Legal Reasons for the Processing of Personal Data	Methods of Collecting Personal Data
21- Health Information	-Health Status (Client Problems)	Execution of Activities in Accordance with the Legislation, Providing Information to Authorized Persons, Institutions and Organizations	Law No. 6698 on the Protection of Personal Data, Exceptions to Processing Sensitive Personal Data (Article 6/3 of the Law No. 6698)	Your health information data is collected via e-mail and voice recording



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To Whom and For What Purpose the Processed Personal Data Can Be Transferred

Your personal data collected by Avita is transferred in accordance with Articles 8 and 9 of the Law on the Protection of Personal Data No. 6698.

Data Category	Processed Personal data	Purposes of Transfer of Personal Data	To Whom We Transfer Personal Data	How We Transfer Personal Data
01- Identity	-Name, Surname -Live -TCKN -Date of birth -Passport Number -Signature	Follow-up and Execution of Legal Affairs, Execution of Goods/Services After-Sales Support Services, Follow-up of Requests/Complaints, Providing Information to Authorized Persons, Institutions and Organizations	Real Persons or Private Law Legal Entities, Suppliers, Authorized Public Institutions and Organizations	E-Mail
02- Contact Information	-Address -Email -Telephone number	Execution of Goods/Services After-Sales Support Services, Execution of Contract Processes, Providing Information to Authorized Persons, Institutions and Organizations	Real Persons or Private Law Legal Entities, Suppliers, Authorized Public Institutions and Organizations	E-Mail
06- Legal Action	- Information in Correspondence with Judicial Authorities, Information in the Case File, Warnings and Other Documents/Documents Submitted by the Client	Execution of Goods/Services After-Sales Support Services, Execution of Contract Processes, Follow-up of Requests/Complaints, Execution of Activities in Accordance with the Legislation, Providing Information to Authorized Persons, Institutions and Organizations	Real Persons or Private Law Legal Entities, Suppliers, Authorized Public Institutions and Organizations	E-Mail
10 - Finance	-Credit Card Information	Execution of Goods/Services After-Sales Support Services, Execution of Goods/Services Production and Operation Processes	Suppliers, Authorized Public Institutions and Organizations	Supplier Web Form
13- Visual and Audio Recordings	-Switchboard Voice Recording	Execution of Benefits and Benefits Processes for Employees, Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees, Execution of Goods / Services Production and Operation Processes, Execution of Activities in Accordance with the Legislation, Follow-up and Execution of Legal Affairs, Execution / Supervision of Business Activities, Execution / Supervision of Business Activities, Providing Information to Authorized Persons, Institutions and Organizations, Execution of Contract Processes, Storage and Archive Activities Execution, Execution of Activities for Customer Satisfaction, Execution of Performance Evaluation Processes	Suppliers, Authorized Public Institutions and Organizations	Encrypted transfer is provided.
21- Health Information	-Health Information (Medical reports containing examination, treatment and results, etc.)	Execution of Goods/Services After-Sales Support Services, Execution of Activities in Accordance with the Legislation, Providing Information to Authorized Persons, Institutions and Organizations	Real Persons or Private Law Legal Entities, Suppliers, Authorized Public Institutions and Organizations	E-Mail



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26- Other	-Vehicle License Plate -License No.	Execution of Goods / Services Production and Operation Processes, Execution of Goods / Services After-Sales Support Services, Execution of Contract Processes, Follow-up of Requests / Complaints	Real Persons or Private Law Legal Entities, Suppliers, Authorized Public Institutions and Organizations	E-Mail
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As a data owner, you are subject to Article 11 of the KVK Law. What are your rights listed in the article?

The rights of real persons whose Personal Data are processed in accordance with Article 11 of the KVK Law are as follows;

- to learn whether Personal Data is processed or not,
- to request information if your personal data are processed,
- to learn the purpose of your data processing and whether this data is used for intended purposes,
- to know the third parties to whom your personal data is transferred at home or abroad,
- to request correction if your personal data were processed incompletely or inaccurately and to request that third persons, to whom your personal data are transferred, get notified about the transactions carried out within this scope
- Despite being processed as per the provisions of the Law numbered 6698 and other relevant laws, in the event that reasons requiring the processing have disappeared, to request the erasure or destruction of your personal data and to request that third persons, to whom your personal data are transferred, get notified about the transactions carried out within this scope,
- to object to the processing, exclusively by automatic means, of your personal data, which leads to an unfavorable consequence for you,
- to request compensation for the damage arising from the unlawful processing of your personal data.

Your request, which includes your applications for your rights listed above, the necessary information identifying your identity, and your explanations regarding your right that you request to exercise from the rights specified in Article 11 of the KVK Law; **By filling out the** Data Owner Application Form **on the www.avita.com.tr website** , send a signed copy of the form **to the address** "Büyükdere Cad. No:237 Noramin İş Mrk. K:3 D:316 Maslak Sarıyer/İSTANBUL" **with documents identifying your identity** in person, through a notary public or **to our remed@hs03.kep.tr registered e-mail address with secure electronic signature, mobile signature or kvkk@remed.com.tr** You can send it as an e-mail to the address.

Depending on the nature of the request, Avita will conclude the request free of charge as soon as possible and within thirty (30) days at the latest. However, if the transaction requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board in the Communiqué on the Procedures and Principles of Application to the Data Controller may be charged. Applications must be made in Turkish. In the applications, name, surname and signature if the application is in writing, T.R. identification number for citizens of the Republic of Turkey, nationality for foreigners, passport number/identification number, residential or workplace address for notification, e-mail address for notification, telephone or fax number and subject of the request must be included.

In the application containing the explanations regarding the right that the Personal Data owner has and will make and requests to use the above-mentioned rights; The subject requested must be clear and understandable, the subject requested must be related to the person or if he is acting on behalf of someone else, he must be specifically authorized in this regard and document his authority, the application must contain identity and address information, and documents proving his identity must be attached to the application.

Within the scope of the KVK Law, we notify as "Data Controller".

Best regards

Remed Uluslararası Destek ve Danışmanlık Hizmetleri Ticaret A.Ş.

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