



ER-KIM GLOBAL POLICY

POLICY ON PROTECTION AND PROCESSING OF
PERSONAL DATA

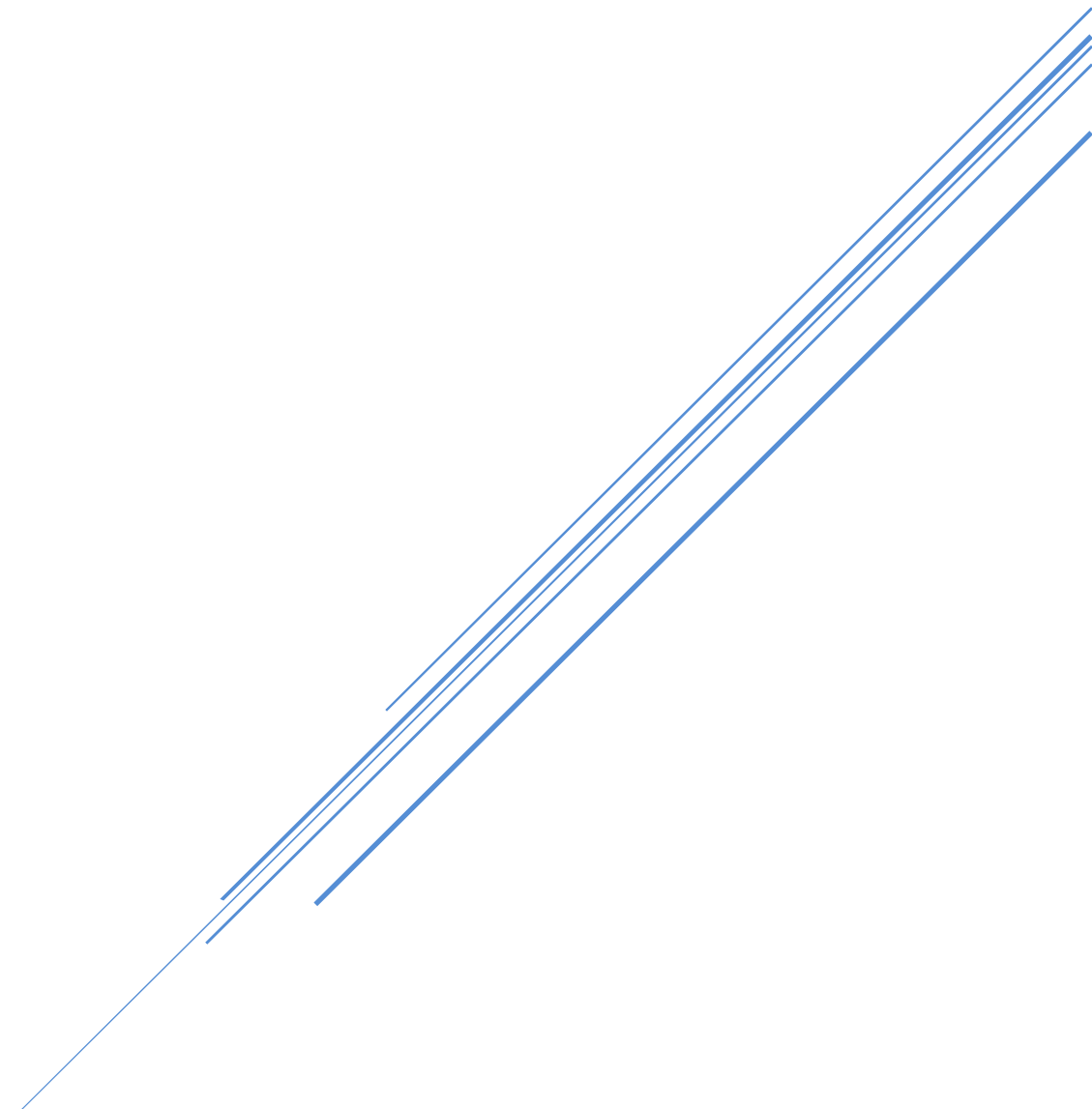




Table of Contents

1.	INTRODUCTION	2
2.	SCOPE AND APPLICABILITY	2
3.	DEFINITIONS	2
4.	PERSONAL DATA PROCESSING PRINCIPLES	3
5.	PERSONAL DATA PROCESSING CONDITIONS AND EXCEPTIONAL CIRCUMSTANCES	4
7.	PERSONAL DATA CLASSIFICATION	5
8.	ENSURING THE SECURITY OF PERSONAL DATA	6
9.	PURPOSES OF PROCESSING PERSONAL DATA	6
10.	TRANSFER OF PERSONAL DATA DOMESTICALLY AND ABROAD	9
11.	DESTRUCTION OF PERSONAL DATA	10
12.	RIGHTS OF THE PERSONAL DATA SUBJECT	10
13.	APPLICATION TO THE DATA CONTROLLER	11
14.	YOUR RESPONSIBILITIES	11
15.	RECORD KEEPING	11
16.	TRAINING AND COMMUNICATION	11
17.	MONITORING AND REVIEW	12
	ANNEX 1 DOCUMENT HISTORY AND VERSION CONTROL RECORD	13



1. INTRODUCTION

Regarding your personal data processed by our Company; your personal data processed, principles of processing personal data, purposes and conditions of personal data processing, transfer of your personal data domestically and abroad, destruction of your personal data and practices and principles regarding your rights on your personal data processed are notified to you below.

Er-Kim İlaç Sanayi Ve Ticaret Anonim Şirketi (hereinafter referred to as "Er-Kim Turkey" or "Company") will act in accordance with the procedures and processes set out in this Policy in order to ensure compliance with the legislation on the protection of personal data and the processing, use, destruction, transfer and other issues of your personal data in accordance with the law and other regulations.

The purpose of this policy is:

- a. To comply with the Law No. 6698 on the Protection of Personal Data ("KVKK") published in the Official Gazette dated 07.04.2016 and numbered 29677 and related legal regulations and
- b. To determine the procedures and principles adopted by our Company and to be applied within the scope of the disclosure obligation of the data controller.

2. SCOPE AND APPLICABILITY

This policy applies to all Er-Kim Turkey employees and data subjects who are in any way connected with Er-Kim Turkey.

3. DEFINITIONS

EXPLICIT CONSENT	Consent on a specific issue, based on information and freely given.
ANONYMIZATION	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
PERSONAL DATA	Any information relating to an identified or identifiable natural person.
PROCESSING OF PERSONAL DATA	Any operation performed on personal data such as obtaining, recording, storing, preserving, modifying, reorganizing, 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.



PERSONAL DATA OWNER	The natural person whose personal data is processed.
(DATA SUBJECT)	
SENSITIVE PERSONAL DATA	Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive personal data.
DATA PROCESSOR	A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.
DATA CONTROLLER	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

4. PERSONAL DATA PROCESSING PRINCIPLES

Our Company carries out personal data processing activities within the framework of the principles and principles listed below in accordance with Article 4 of the KVKK, which regulates the procedures and principles regarding the processing of personal data.

a) COMPLIANCE WITH LAW AND GOOD FAITH

Our Company processes your personal data in accordance with the KVKK and other laws and regulations that must be complied with due to the work performed.

b) BEING ACCURATE AND UP-TO-DATE

Our company fulfills the necessary procedures and takes technical and administrative measures to ensure that the personal data provided by the data owner is not changed without permission and inaccurately, and to update the personal data if requested by the data owner when there is a change in the processed data.

c) PROCESSING FOR SPECIFIC, EXPLICIT AND LEGITIMATE PURPOSES

Your personal data processed by our Company are processed in accordance with the processing purpose notified to you and within the notified framework.

d) RELEVANT, LIMITED AND PROPORTIONATE TO THE PURPOSE OF PROCESSING



Our Company does not process personal data that do not overlap with its activities, are not required within the framework of Company activities and exceed the purpose of processing.

e) RETENTION FOR THE PERIOD STIPULATED IN THE RELEVANT LEGISLATION OR REQUIRED FOR THE PURPOSE FOR WHICH THEY ARE PROCESSED

Your data processed within the framework of KVKK and other relevant laws and regulations are retained for the periods stipulated in the relevant legislation or required to be retained due to the nature of the personal data processed.

5. PERSONAL DATA PROCESSING CONDITIONS AND EXCEPTIONAL CIRCUMSTANCES

GENERAL PERSONAL DATA TO BE PROCESSED WITHIN THE FRAMEWORK OF THE COMPANY'S ACTIVITIES;

- a) Provided that the explicit consent of the data subject is obtained or
- b) That which is expressly provided for in the law,
- c) It is mandatory for the protection of the life or bodily integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid,
- d) The processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract,
- e) Mandatory for the data controller to fulfill its legal obligation,
- f) That which has been made public by the data subject,
- g) Data processing is mandatory for the establishment, exercise or protection of a right,
- h) Provided that it does not harm the fundamental rights and freedoms of the data subject, if there is one of the situations where data processing is mandatory for the legitimate interests of the data controller, it can be processed without obtaining the explicit consent of the data subject.

SENSITIVE PERSONAL DATA TO BE PROCESSED WITHIN THE FRAMEWORK OF THE COMPANY'S ACTIVITIES;

- It will not be processed without the explicit consent of the data subject,
- Except for special categories of personal data relating to health and sexual life, data can be processed without the explicit consent of the data subject in cases stipulated by law,
- Special categories of data relating to health and sexual life may be processed without the explicit consent of the data subject for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.



7. PERSONAL DATA CLASSIFICATION

Identity Information	Name, surname, mother's name, father's name, place of birth, date of birth, marital status, religion, blood group, province, district and neighborhood where registered and information written in your identity card, including but not limited to.
Contact Information	Your contact data such as home phone number, mobile phone number, residence address or other address information, e-mail address, etc. requested from you or provided by you in order to contact you.
Personal Information	<ul style="list-style-type: none"> • Photocopy of identity card, • Population registration sample, • Certificate of Residence, • Health report • Diploma photocopy, • Criminal record, • Passport size photo, • Proof of family status, • Proof of military service, • Employment Contract / Service Contract, • SSI employment declaration, • Information and documents regarding your health condition.
Bank Account Information	<ul style="list-style-type: none"> • Bank account number, IBAN number, credit card and other information related to the debit card.
Background Information	<ul style="list-style-type: none"> • Your education information written in your CV document or requested by our Company or provided by you, school information, certificate information, educational status and information about your education, • Information about the place, date and duration of your work experience written in your CV document or requested by our Company or provided by you, information about your previous job and position, any information about your work experience,



	<ul style="list-style-type: none"> • Your photograph written in your CV document or requested by our Company or provided by you, • Your driver's license and the information written on your driver's license written on your resume document or requested by our Company or given by you, • Information about your references and references written in your CV document or requested by our Company or provided by you.
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8. ENSURING THE SECURITY OF PERSONAL DATA

As Er-Kim İlaç, we carry out the technical and administrative measures deemed necessary to ensure the security of your personal data that we process within the framework of company activities in accordance with the KVKK and the relevant legislation, within the framework of the necessary technological infrastructure; in this direction, we carry out the necessary audits by taking measures against data breach, unauthorized access, data loss, unauthorized modification of data and other threats.

In this context, we identify existing risks and threats, conduct awareness activities by training our employees, determine policies and procedures regarding personal data security, ensure personal data minimization, and create the necessary confidentiality agreements with data processors; we use firewalls and up-to-date anti-virus programs to ensure cyber security, configure our existing software and hardware, perform software updates and audits; we ensure the security of physical and electronic media containing personal data, and take necessary measures to prevent unauthorized breaches of your data security by unauthorized persons through key management, access logs, user account management, penetration control and encryption methods.

9. PURPOSES OF PROCESSING PERSONAL DATA

Your personal data is processed for the purposes of and limited to the fulfillment of company activities and obligations arising from the law.

In this direction,

a) REGARDING THE SECURITY CAMERA APPLICATION AT THE WORKPLACE

- Within Er-Kim, in accordance with the provisions of the Occupational Health and Safety Law No. 6331, Labor Law No. 4857 and secondary legislation, security cameras are monitored at the entrance to the workplace in order to protect the safety of life and property of employees, to ensure the security of the workplace and to carry out disciplinary and legal processes within the framework of these purposes. In the area where monitoring is carried out, the camera warning sign informs that monitoring is being carried out.
- The security camera was positioned by observing the limit of proportionality within the framework of ensuring security at the workplace and the legitimate interest of the employer.



b) REGARDING PERSONAL DATA OF CUSTOMERS, PROSPECTIVE CUSTOMERS AND BUSINESS AND SOLUTION PARTNERS

- Providing more effective service with our suppliers and business partners; making the necessary notifications to public institutions and organizations within the framework of legal and financial processes,
- Ensuring workplace safety, commercial and economic security,
- Within the scope of audits, authorized private law natural and legal persons can audit the compliance of business activities carried out by authorized private law natural and legal persons,
- Including visuals on corporate social media accounts regarding the organization and other activities of our Company,
- Carrying out the necessary work flow processes by our relevant departments in order to fulfill and improve the service offered by our company,
- Identity information, contact information, financial identity information and other personal data provided to us and/or requested by us for the purposes of fulfilling the obligations arising from the law and the contract may be processed in electronic and physical environments.

c) IN TERMS OF PERSONAL DATA OF HEALTH PROFESSIONALS

- Execution of value transfer and sponsorship processes carried out by Er-Kim Pharmaceuticals within the framework of the "*Regulation on Promotional Activities of Medicinal Products for Human Use*", Corruption Laws and other legislation provisions,
- Recording personal data of healthcare professionals by the Company and transferring them to third parties in Turkey or abroad in order to organize activities such as fairs, seminars, trainings, conferences, trips, social events organized by the Company and/or third parties on behalf of the Company and to provide accommodation and transportation services, to carry out visa procedures, to complete insurance transactions,
- Providing information about the product to Healthcare Professionals upon request,
- Processing of personal data made public by the Healthcare Professional to facilitate communication,
- Your identity information, contact information, CV information and other personal data provided to us and/or requested by us for the purposes of making the necessary notifications to the Ministry of Health, Turkish Medicines and Medical Devices Agency in accordance with the legal obligation are processed in electronic and physical environments.

d) IN TERMS OF PERSONAL DATA OF PROSPECTIVE EMPLOYEES



- Initiating, executing and terminating recruitment processes at the Headquarters and Regional Offices where Er-Kim İlaç operates, recording recruitment processes, monitoring and improving recruitment processes and procedures,
- Job applications and resumes can be forwarded to the relevant department to check suitability for the job and proceed to the interview process,
- Determining, confirming, recording, conducting tests and analyzing whether you provide sufficient and necessary qualifications for the position applied for by the employee candidate at the time of job application, during the job application process and during all kinds of transactions to be carried out after the job application,
- Calling your references and getting references about you,
- At the end of the job application process, if the interview results positively, you can be placed in your position at the workplace,
- At the end of the job application process, in case the job interview results in a negative result, your identity information, contact information, resume information and other personal data provided to us and / or requested by us in line with the purposes and methods of informing you about the job opportunity by making the necessary evaluations again when a suitable position is opened in our Company are processed in electronic and physical environments.

e) IN TERMS OF PERSONAL DATA OF EMPLOYEES

- Ensuring internal order, workplace peace and security,
- Processing of personal data belonging to employees for the purpose of fulfilling legal obligations such as the creation and storage of personnel files and sharing them with auditing public institutions and organizations and authorized private law real or legal persons during workplace audits,
- All operations performed in the Fileserver system are recorded through logging,
- Use of programs deemed appropriate by the Company within the scope of the Company's commercial and other activities,
- Including visuals on corporate social media accounts regarding the organization and other activities of our Company,
- The use of entry-exit timing methods and other electronic surveillance methods to ensure the safety of the workplace and employees and to protect life and property,
- Sharing personal data of employees with the private insurance company with which the company is a business partner, if necessary for the establishment of private health insurance and other rights of employees,



- Recording of personal data belonging to employees by the Company and transferring them to third parties in Turkey or abroad within the scope of activities such as fairs, seminars, trainings, conferences, trips, social events by the Company and/or third parties on behalf of the Company and the necessary organization for the provision of accommodation and transportation services, visa procedures, completion of insurance procedures, informing about the developments about the Company, contacting him/her and his/her relatives when necessary, motivational gifts (such as gifts, promotions), promotion and advertisement of the Company's activities and other purposes,
- Processing general and private personal data of employees within the scope of documents and papers to be kept within the scope of OHS activities, sharing them with the workplace doctor and OHS Specialist,
- Keeping records of the GSM line, credit card or vehicles allocated to the employee within the scope of the employer's management right,
- Your identity information, CV information, personal information, health information, bank account information, contact information and other personal data provided to us and/or requested by us in line with the purposes and methods of keeping the correspondence carried out with the corporate e-mail account allocated to the use of the employee and e-mail files containing these correspondences recorded in the cloud system available abroad can be processed in electronic and physical environments.

10. TRANSFER OF PERSONAL DATA DOMESTICALLY AND ABROAD

Your personal data may be transferred;

- In order to improve our company's productivity and employment policies, and to ensure sustainability, we may sometimes provide services to third parties,
- Banks, third parties, occupational health and safety specialists, occupational physicians and health personnel in order to fulfill the obligations of the employer under the employment contract,
- to Microsoft Office applications, cloud solutions, SAP applications and backup systems whose databases are located abroad in order to administer and manage the business within the company, to carry out company business, to implement company policies, and to manage and execute the workflow efficiently,
- Within the scope of the realization of the commercial and other activities of the Company, it has been checked that the Company has taken the technical and administrative security measures required by the legislation and sector practices, and the commitments regarding this issue have been arranged between the parties to the external service providers,
- In addition, in order to provide products and services, to Er-Kim İlaç regional directorates, our business partners, suppliers, third parties from whom services are received within the framework of Company activities and/or abroad.



- Your personal data may be shared with execution offices or courts (at all levels and levels), as well as Ministries, Directorates, Social Security Institution and other persons upon request or when necessary in line with our legal obligations.

11. DESTRUCTION OF PERSONAL DATA

Personal data processed within the framework of our Company's activities are stored within the framework of the purpose of processing and for the periods necessary to ensure this purpose and for the retention period stipulated within the framework of the relevant legislation.

Data that has lost its function, whose retention period has expired, and which is requested to be destroyed by the data owner, if possible within the framework of the legislation, is destroyed by using the appropriate method of deletion, destruction or anonymization of personal data listed in Article 7 of the KVKK.

Deletion of personal data is the process of making personal data inaccessible and non-reusable in any way for the relevant users.

Destruction of personal data is the process of making personal data inaccessible, unrecoverable and unusable by anyone in any way.

Anonymization of personal data means making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if the personal data is matched with other data.

12. RIGHTS OF THE PERSONAL DATA SUBJECT

Regarding the personal data processed within the scope of our Company's activities, the data owner may apply to our Company within the framework of your rights listed in Article 11 of the KVKK;

- a. Learn whether their personal data is being processed,
- b. Request information if their personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used for their intended purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request correction of personal data in case of incomplete or incorrect processing,
- f. To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK,
- g. To request notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom personal data are transferred,
- h. To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,



- i. In case of damage due to unlawful processing of personal data, it has the right to demand compensation for the damage.

13. APPLICATION TO THE DATA CONTROLLER

In the event that you exercise your above-mentioned rights and make an application to our Company regarding the above-mentioned issues, your requests in your application will be finalized free of charge within thirty (30) business days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost for the Company, the fee in the tariff determined by the Personal Data Protection Board may be requested.

In matters related to the processing of your personal data, you must submit your application to our Company by filling out and signing the application form on the Company's website and proving your identity in person.

ER-KIM İLAÇ SANAYİ VE TİCARET A.Ş. CONTACT INFORMATION

CONTACT MAIL ADDRESS: kykk@er-kim.com

HEAD OFFICE ADDRESS: Levazım Mah. Koru Sok. No:2 Zorlu Center D Blok T-3 Katı D:344 Beşiktaş/İstanbul

WEBSITE ADDRESS FOR CONTACT: <https://www.er-kim.com.tr/>

**In case of written application, please indicate the subject on the envelope as "Information Request within the scope of the Law on the Protection of Personal Data".*

14. YOUR RESPONSIBILITIES

All employees are responsible for the daily monitoring of this policy and compliance with its content. Members of the Board of Directors, managers and those authorized to sign on behalf of ER-KIM are responsible for fulfilling the legal and ethical obligations of this policy and for ensuring that those under their control comply with this policy. Violation of this Policy may result in various sanctions, including termination of employment.

15. RECORD KEEPING

All investigations conducted under this Policy are recorded in writing by the Legal and Compliance Department.

16. TRAINING AND COMMUNICATION

Training on this policy forms part of the orientation period for all new employees. Existing employees should receive regular training on how to implement and comply with this policy. The Legal and Compliance Department is responsible for ensuring that this policy is understood and that adequate and regular training is provided on this topic.



In accordance with the principle of continuous improvement, ER-KIM will be in constant communication and discussion with its employees in order to understand this Policy and to develop and improve it in the future.

17. MONITORING AND REVIEW

The Legal and Compliance Department will measure and regularly monitor and review the effectiveness, appropriateness and adequacy of this policy. Any improvements to be identified will be made as soon as possible. This policy does not constitute a part of the employee's employment contract and may be changed by ER-KIM at any time.

**ANNEX 1 DOCUMENT HISTORY AND VERSION CONTROL RECORD**

Document Name	Policy on Protection and Processing of Personal Data
Author	Bilge KIYAK, Legal and Compliance Manager
Approved by	CEM ZORLULAR, Chairman of the Board
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00	May 9, 2022	Numbering system changed in accordance with DK-2022-0001. The Policy on the Protection and Processing of Personal Data has been edited in accordance with the new format.