

# Privacy Policy

**First Step Doctor (MCA Medical Center Assistance Seyahat Acenteliği Turizm ve Ticaret Limited Şirketi) Martı Marina Özel Sağlık Hizmetleri** Shall be hereinafter referred to as the **COMPANY**, and the “Law on the Protection of Personal Data” shall be referred to as **KVKK**.

This explanation text is prepared within the framework of article 10 of KVKK “Obligation of Data Controller to Inform”. During the collection of your personal data, it is prepared in order to inform you in the most transparent manner as to what purposes your data shall be processed, to whom and for what purposes your processed data may be transferred, about the method of collecting your personal data and the legal reasons as well as about your rights specified in article 11 of the relevant law when we are fulfilling our obligation to inform as the **COMPANY**.

By the data controller **COMPANY**, your personal data shall be collected, processed, stored, updated in case of any change in data, transferred to third persons in cases specified in the law provided that it does not violate the legislation, and classified within the scope of the conditions specified below. The explanations provided for your “Personal Data” in the Explanation Text cover your “Sensitive Personal Data” as well.

This document regulates the use of the Website and provides information about the collection of personal data and the privacy policy. Reading, browsing, or using content stored on the Website is equivalent to accepting this Privacy Policy.

## PERSONAL DATA COLLECTED FROM YOU AS THE DATA SUBJECT

### For Patients Who are to be Examined or Treated:

#### Your Identity Information:

- In case you are a Turkish citizen: Your name, Surname, R.o.T. ID Number, Gender, Date of Birth, Identity Card Number.
- In case you are not a Turkish citizen: Your name, Surname, Nationality, Temporary Identity Number or Passport Number, Gender, Date of Birth.

#### Your Contact Information:

- Your address
- Your GSM Number, E-Mail Address.

(YOUR DATA IN ARTICLES 1-2-3-4 ABOVE ARE PROCESSED IN CASE YOU SHARE EXPRESS CONSENT ACCORDING TO ARTICLE 5/1 OF KVKK.)

### **Your Test Results Obtained During Examination and Treatment:**

- Your laboratory and imaging results, x-rays, test results, examination data, prescription details, your previous illnesses, your permanent diseases, blood type, your health data obtained during the medical diagnosis, treatment, and during the conduction of care services you present for the purpose of monitoring the process in your patient tracing file created within the **COMPANY** during your examination and treatment are processed for the purpose of conducting medical diagnosis, treatment, and care services KVKK 6/3f.
- Your financial data such as payment and invoicing.
- Your private health insurance and SSI data.
- For the purpose of planning and financing of health services, your data related to your private health insurance and Social Security Institution data.
- Your Social Security Institution data within the scope of the services financed by SSI.

(YOUR DATA IN ARTICLES 5-6-7-8-9 ABOVE ARE PROCESSED FOR THE PURPOSE OF THE FULFILLMENT OF KVKK 5/Ç LEGAL OBLIGATION).

- Your comments, responses, and evaluations on the website and social media accounts opened for the name of the **COMPANY**.  
(THESE ARE PROCESSED AS THESE DATA ARE PUBLICIZED BY THE DATA SUBJECT AS SPECIFIED IN KVKK 6/D)

- Your closed circuit camera records taken during your visits for your examination and treatment processed performed within the **COMPANY** (Under each camera within our hospital, there is an explanation text where you, dear patients/visitors, can easily see).
- Your personal data and location details in the forms and questionnaires you have filled in the website <https://medicalcenterassistance.com> of the **COMPANY**.

### **For the Visitors:**

- Your degree of relation to the patient.
- Your closed circuit camera records and voice records taken during your visits to the **COMPANY**.  
(Under each camera within the **COMPANY**, there are QR codes which you, dear patients/visitors, can easily see, which will lead to an explanation text).

## For Personnel and Doctors:

### Data Collected During Job Application:

- Your name, Surname, Gender.
- Graduate and Associate Educational Information.
- Specialty Field Information.
- GSM Number, E-Mail Address.
- Foreign Language Knowledge Level.

(YOUR DATA IN ARTICLES 11-12-13-14-15-16-17-18-19-20-21 ABOVE ARE PROCESSED IN CASE YOU SHARE EXPRESS CONSENT ACCORDING TO ARTICLE 5/1 OF KVKK.)

### Data Collected From Employed Personnel and Doctors:

- Your name, Surname, Gender, R.o.T. Identity Number, Identity or Passport Photocopy.
- Your Address.
- Your Medical Records which you uploaded to the system.
- GSM Number, E-Mail Address.
- Bank Account Number/IBAN Number To Which Your Wage is Deposited (Financial Data).
- Health Board Report Indicating There Is No Obstacle for You to Perform Your Profession.
- Specialty Field Information.

(DATA IN ARTICLES 23-24-25-26-27-28 ABOVE ARE PROCESSED FOR THE FULFILLMENT OF LEGAL OBLIGATION SPECIFIED ON KVKK 6/Ç).

### For What Purposes Your Personal Data Is Processed:

- Processed if you give express consent within the scope of KVKK article 5/1.
- Processed in order to fulfill the legal obligation within the scope of KVKK article 5/1ç.
- Processed if the data are publicized by the data subject within the scope of KVKK article 5/1d.
- In case you make a job application to the **COMPANY**, your data are processed during and following the recruitment, checking the compliance of experience, knowledge, and skills with the sought criteria.
- For the fulfillment of obligations of the **COMPANY** employees arising out of employment contract and/or legislation.
- Ensuring the security of **COMPANY** fixtures and/or resources.
- Execution of the contracts signed between the parties and providing the authority control of the signing parties, planning of commercial and/or

business strategies in accordance with **COMPANY** procedures and/or relevant legislation, ensuring and provision of commercial job security.

- Ensuring the accuracy and actuality of the data collected by the **COMPANY** from the patients, personnel, doctors, and the partners of the **COMPANY** with a business relation.
- Planning and execution of skill – career development activities of personnel and doctors employed within the **COMPANY**.
- Creation of visitor and patient records, tracing the same, as well as ensuring the discipline, security, and checks in the company campus.
- In cases required by public safety; informing authorized public institutions and organizations upon request.
- Performance of required transactions and businesses for the benefit of the parties before the contractual legal persons to the extent required by the provision of service or employee – employer relation or any other business relation.
- For the purpose of the conduction of necessary operation activities within the company.
- Ensuring the human resources management.
- Taking the necessary steps in making commercial decisions, implementation, and performance of the same.
- Planning and management of the internal operation of the institution by the company management.
- Analyzing for the purpose of the improvement of health services by quality, patience experience, and information systems departments.
- For these purposes, the data may be automatically processed as a whole or in part, or may also be processed in ways which are not automatic on the condition that it is part of a data record system.

#### **For What Purposes Your Data is Transferred to Whom:**

You acknowledge and agree that in certain circumstances we may be obliged to disclose personal information that you have provided to us to third parties, including, but not limited to, any relevant regulator and law enforcement agencies for example, in order to conform to any requirements of law or to comply with any legal process, as well as to protect and defend our rights.

We reserve the right to transfer information (including any personal information you provide) to a third party in the event of a sale, merger, liquidation, receivership, or transfer of all or substantially all of the assets of Medical Center Assistance Group.

Within the framework of Health Services Fundamental Law numbered 3359, Decree Law Concerning the Organization and Duties of the Ministry of Health and Affiliates, Private Hospitals Regulation, Regulation on the

Processing of Personal Health Data and the Protection of Privacy, regulations of the Ministry of Health, articles 8 and 9 of KVKK numbered 5598, and the provisions of other relevant legislation, in line with the purposes specified in article 2 above; your personal data may be shared with and transferred to:

- Ministry of Health, and its affiliated institutions and family physician centers.
- Private insurance companies.
- Social Security Institution.
- Hospitals and Clinics.
- Directorate General of Security and other law enforcement.
- General Directorate of the Census.
- Turkish Pharmacists' Association.
- Judicial authorities (Courts and Enforcement Offices).
- Laboratories, medical centers, ambulance, medical device, and health service providing institutions within the domestic borders with which the **COMPANY** is in cooperation for medical diagnosis and treatment.
- Medical institution where the patient is transferred or has applied himself/herself.
- Your legal representatives whom you have expressly authorized.
- Third persons from whom the **COMPANY** receives consultancy including the attorneys, tax consultants, and auditors.
- Regulatory and supervisory institutions and official bodies.
- Suppliers from whom the **COMPANY** benefits from the services and with whom the **COMPANY** is in cooperation.
- Cloud service providers who have servers within the domestic borders for the storage of personal data. DATA IS NOT TRANSFERRED ABROAD.

### **Collection Methods and Legal Causes of Your Personal Data:**

Your personal data is collected and processed by the **COMPANY** within the framework of:

- The realization of the objectives specified in the Private Hospitals Regulation,
- The regulation on the Processing of Personal Health Data and the Protection of Privacy,
- Health Services Fundamental Law numbered 3359,
- Turkish Penal Code numbered 5237,
- Turkish Commercial Code numbered 6102,
- Labor Law numbered 4857,
- And other relevant legislation.

### **Rights of the Data Subject:**

Under Article 11 of KVKK and the Constitution of the Republic of Turkey, you have the following rights concerning your personal data:

- **Learn whether your personal data has been processed,**
- **Request information about the processing if your personal data has been processed,**
- **Learn the purpose of processing and whether this data is used for the intended purposes,**
- **Learn about the third parties to whom your data has been transferred in Turkey or abroad,**
- **Request correction of any incomplete or inaccurate data,**
- **Request deletion or destruction of personal data under specific conditions,**
- **Request notification of the operations carried out for rectifying incomplete or inaccurate data, and for deleting or destroying the data, to third parties to whom the personal data has been transferred,**
- **Object to any adverse result through the analysis of processed data exclusively by automated systems,**
- **Claim compensation for any damages arising from unlawful processing.**

**Application to the COMPANY:**

Applications can be made in person at the COMPANY's address Saray Mahallesi Guzelyali Caddesi No 26/4 Alanya, by sending an email to [info@medicalcenterassistance.com](mailto:info@medicalcenterassistance.com), or through the contact us section at <https://medicalcenterassistance.com>.

**CONTACT INFORMATION:**

**Company Name:** Medical Center Assistance (MCA Medical Center Assistance Seyahat Acenteliği Turizm ve Ticaret Limited Şirketi) & Martı Marina Özel Sağlık Hizmetleri Tur. Tic. Ltd. Şti

**Address:** Saray Mahallesi Guzelyali Caddesi No 26/4 Alanya

**Telephone:** +90540 2911 911

**Email:** [help@firststepdoctor.com](mailto:help@firststepdoctor.com)

**Website:** <https://www.firststepdoctor.com>

**Representative:** Sahin Bedir

**Cookie Policy:**

**Cookies** are text files stored on your device that allow us to recognize repeat users and facilitate access to our sites. They do not damage your device or contain personal data.

## Types of Cookies:

- **Temporary (Session) Cookies:** Valid during your browser session.
- **Persistent Cookies:** Remain until deleted.

## Purpose of Cookies:

- **Mandatory Cookies:** Ensure site operation and security.
- **Analysis/Performance Cookies:** Improve site functionality and detect errors.
- **Functionality Cookies:** Remember user preferences.
- **Target and Advertising Cookies:** Present relevant and personalized content.

## Data Security:

Communication with the COMPANY's server is encrypted using SSL, and databases are protected from third-party access.

For more detailed information, contact the COMPANY or visit the website.