

## PRIVACY POLICY

Last Updated: 04.08.2022

CRANIOCATCH MEDİKAL VE DENTAL BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ / CRANIOCATCH MEDICAL and DENTAL INFORMATION TECHNOLOGIES INC. (may be referred to as “we”, “us” or “Craniocatch Inc.”)

Customer is referred to as “you”, “data subject”.

This Privacy Policy has been prepared in order to ensure fulfilment of Craniocatch obligation to inform you as data controller regarding your personal data as per the scope of Article 10 of Personal Data Protection Law numbered 6698.

This Privacy Policy explains the privacy practices for [www.craniocatch.com](http://www.craniocatch.com) (may be referred to as “website”) and what information of the data subjects will be collected and stored. This privacy policy also does not apply to information we collect in the company’s software product.

### INFORMATION WE COLLECT

**Customer Information:** If you sign in to website or requested demo use or send us an email, we collect the information about your credentials (name, surname, identity number), contact information (phone number, e-mail address, permanent address), employee information (the name of the company you work, tax identification number)

**IP and Log Information:** If you visit our website, electronic data processing security information such as IP address of all visitors, whether they are customer or not, and log file information. Log file information is automatically reported by your browser each time you access a web page. Log files may include, browser type, number of clicks, domain names, pages viewed, URL’s and other such information.

**Cookies:** When you visit the website, we may send cookies which are a small text file. Some of the cookies does not collect personal information about you. You can read our cookie policy and you can refuse the cookies which are not obligatory. But some of the features of Website may not function properly if you decline the use some cookies.

### PURPOSES of PROCESSING PERSONAL DATA

We collect and store your personal information according to the Article 4 of the Personal Data Protection Law for the following purposes:

- Providing the services,
- Planning business strategies,
- Conducting the information security process,
- Conducting client relations processes,
- Registration of identity, address, tax number and other information required for the identification of the owners and business partners of all kinds of works and transactions,

- Giving information to the competent court, the Enforcement Office, institutions and / or organizations,

### **The Methods and Legal Reasons of Collection of Personal Data**

Personal Data are collected by Craniocatch Inc according to the following clauses of article 5(2);

“a” It is expressly provided for by the laws

“c” Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract,

“e” Data processing is necessary for the establishment, exercise or protection of any right,

“f” Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Personal Data collected for these legal reasons shall be processed and transferred by Kılınç Law & Consulting in accordance with the basic principles stipulated by LPPD, Personal Data processing conditions and purposes specified in Article 5 and Article 6 of LPPD for the purposes specified herein.

### **Processing of Personal Data**

Craniocatch Inc shall protect Personal Data only for definite, clear and legal purposes and will be able to store it for the periods required for the purposes of processing of the Personal Data described above in the relevant section.

Your personal data is processed via the website, e-mail, digital forms and other computer technologies, according to the legal reasons stated above.

### **Transfer of Personal Data**

Your Personal Data shall be transferred by Craniocatch Inc to its business partners, lawyers and competent courts and/or enforcement offices and public institutions and organizations for the purpose of legal and financial audits in Turkey in accordance with article 8 of the Personal Data Protection Law.

Craniocatch Inc. takes all the necessary technical and administrative measures in case your personal data is transferred to home or abroad. In addition, a commitment is taken from the third parties who transfer data to ensure that they take the necessary technical and administrative measures.

### **Rights of Data Subject**

According to article 11 of Personal Data Protection Law everyone has the right to “request information”.

Data subjects have the following rights under Personal Data Protection Law:

- to learn whether his/her Personal Data are processed or not,

- to demand for information if his/her Personal Data have been processed,
- to learn the purpose of the processing of his/her personal data and whether these Personal Data are used in compliance with the purpose,
- to know the third parties to whom his/her Personal Data are transferred in country or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of his/her Personal Data under the conditions referred in Article 7
- to request reporting of the operations carried out pursuant to sub paragraphs (d) and (e) to third parties to whom his/her personal data has been transferred,
- to object to the occurrence of a result against the person himself/herself by analysing the data processed solely through automated systems,
- to claim compensation for the damage arising from the unlawful processing of his/her Personal Data.

#### **Application for Requesting Information**

You may submit your requests regarding your rights mentioned above at [info@craniocatch.com](mailto:info@craniocatch.com) or [craniocatch@hs01.kep.tr](mailto:craniocatch@hs01.kep.tr) addresses or from our address below in written form. Applications duly will be responded as soon as possible and in any case within 30 (thirty) days at the latest.

CRANIOCATCH MEDİKAL VE DENTAL BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ /  
CRANIOCATCH MEDICAL and DENTAL INFORMATION TECHNOLOGIES INC.

Address: Büyükdere Mah. Prof Dr Nabi Avcı Blv ETGB Osmangazi Technology Park No  
108