

**DROGSAN İLAÇLARI SANAYİ VE TİCARET ANONİM ŞİRKETİ**  
**CLARIFICATION TEXT FOR THE PROTECTION AND PROCESSING**  
**OF PERSONAL DATA**

Your security is important for us!

With this Clarification Text, we aim to inform you about your personal data that is processed by **DROGSAN İLAÇLARI SANAYİ VE TİCARET ANONİM ŞİRKETİ** ("Drogsan" or "Company") as per Article 10, "the Responsibility of the Data Controller for Clarification", of the Law No. 6698 on the Protection of Personal Data ("LPPD" or "the Law") that has been published in the Official Gazette issue 29677 of April 7, 2016 for the purposes of protecting the fundamental rights and liberties of individuals, and especially the right of privacy, in the processing of personal data, and pursuant to the Communiqué on the Principles and Procedures to Be Followed for the Performance of the Clarification Responsibility that has been published in the Official Gazette issue 30356 of March 10, 2018.

### 1. DATA CONTROLLER

As per the Law No. 6698 on the Protection of Personal Data ("LPPD"), DROGSAN İLAÇLARI SANAYİ VE TİCARET ANONİM ŞİRKETİ ("Drogsan") has the capacity of Data Controller, and you can contact our company with the contact information provided below.

**Headquarters Address** : Oğuzlar Mah. 1370. Sok. No:7/3 Balgat Çankaya / ANKARA  
**Telephone** : 0312 287 74 50  
**Fax** : 0312 287 61 15  
**Website** : [www.drogsan.com.tr](http://www.drogsan.com.tr)  
**Email** : [info@drogsan.com.tr](mailto:info@drogsan.com.tr)

### 2. PROCESSED PERSONAL DATA

The following personal data are processed within the scope of your relationship with Drogsan:

- **Your Credentials:** name and surname, date and place of birth, age, photograph, identification card and identification number.
- **Your Contact Information:** workplace address, home address, email, telephone, mobile telephone, address of residence, address registration system records.
- **Your Education, Work and Professional Data:** work history, employer name, graduated school, professional competencies, CV information, residence permit, work certificate.
- **Your Bank Account Data:** bank account information such as bank account number, IBAN number.
- **Data Related to the Security of Our Company Offices:** records of entry and exit to and from facilities, camera records.
- **Data Related to Camera Records:** your visual and auditory data.
- **Legal Procedures:** your data related to the execution of legal and enforcement procedures.
- **Customer Processing and Marketing:** your data related to customer relationships management and promotion and marketing operations.
- **Your Data Related to Cyber Security:** usernames, passwords, audit trails, IP addresses, website access logs and data related to cyber security involving the logs.

### 3. PROCESSING PURPOSES OF PERSONAL DATA

Your personal data, acquired through your relationship with Drogsan, may be processed under following purposes based on such relationship:

- Full and duly performance of our contractual and legal responsibilities,
- Development and diversification of our services,
- Performance of our quality and standard audits,
- Meeting the data requests from public organizations and agencies,
- Ensuring legal and commercial security,
- Retaining and maintaining case files and notifications for the execution of legal procedures, managing enforcement procedures,
- Performance of debt follow-up and meeting with the guarantors of the debtors,
- Issuance of powers of attorney, statements of signature and signatory circulars,

- Retaining contracted attorney information and issuing powers of attorney on behalf of the same,
- Follow up of financial and/or accounting works,
- Contract processes management,
- Establishment of legal procedures and follow up of legal processes,
- Submitting tax statements,
- Event and organization management,
- Arrangement of accommodation and transportation services for events and meetings,
- Organization of participation to domestic and abroad events,
- Sending invitations for meetings and events,
- Identification and application of commercial and business strategies,
- Keeping files on public, commercial and social business partners,
- Follow up of incoming and outgoing documents,
- Keeping an archive,
- Procurement of office needs
- Performance of communication activities (telephone, internet, tv lines, operators),
- Provision of lunches and security services,
- Provision of outsourced consultancy,
- Recording of visitor accesses,
- Maintaining camera records,
- Evaluation of domestic and foreign collaboration offers,
- Execution of all certification and independent audit processes,
- Sharing information with suppliers to realized work processes,
- Follow up of domestic and international cargo shipments,
- Organization of investment plans and activities,
- Ensuring sample drug shipments,
- Answering literature requests from physicians,
- Follow up of complaints from pharmacies and consumers related to products,
- Collection of pharmacovigilance data,
- Performance of promotional activities,
- Follow up of customer satisfaction,
- Management of auxiliary raw material, raw material and equipment procurement processes,
- Sharing information related to contract manufacturing,
- Process of participation in TÜBİTAK (Scientific and Technological Research Council of Turkey) projects,
- Sharing the inhouse inventor data when making patent applications,
- Management of international procurement, shipment and customs processes,
- Carrying out the EBS (Electronic Application System) and TITCK (Turkish Medicine and Medical Devices Agency) applications,
- Maintaining information of the volunteers that want to participate in clinical research.

#### **4. TRANSFER OF PROCESSED PERSONAL DATA**

For the purposes included in Article 3 of this Clarification text and pursuant to the provisions of the Law in relation to the transfer and international transfer of personal data, your personal data may be shared with the domestic and international legally authorized public authorities and agencies, law enforcement agencies, courts and enforcement offices, real and legal parties that we are in a relation with, service providing companies and their officials, business partners, banks, supplies and provides of support services.

#### **5. COLLECTION METHODS OF PERSONAL DATA AND LEGAL REASONING**

Drogsan collects your personal data when you contact our Company and/or when our legal relationship is established, from you and third parties including partnerships, affiliates, solution partners with which we collaborate or have a contractual relationship and legal authorities via call centers, the Internet, mobile applications, social media and other public media or organized trainings, organizations and similar events for the purposes of performing the abovementioned purposes and services as per the framework stipulated in Articles 5, 6 and 8 of the Law.

## **6. RIGHTS OF THE INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED**

As per Article 11 of the Law, you have the following rights regarding your personal data:

- Learning whether the personal data have been processed or not,
- If personal data have been processed, requesting information regarding the same,
- Learning the purpose of processing personal data, and whether the personal data have been used for such purpose,
- Learning the domestic or international third parties to whom the personal data have been transferred,
- Requesting the correction of personal data if they have been processed erroneously or incomplete,
- Requesting the deletion or destruction of personal data,
- In case of correction, deletion or destruction of personal data, requesting the notification of such operations to the third parties to whom the personal data have been transferred,
- Objecting to any consequences against the data owner arising out of processed personal data being analyzed with fully automated systems,
- Claiming compensation for damages in case of damages arising out of processing personal data against the law.

## **7. IF YOU WOULD LIKE TO CONTACT US FOR YOUR RIGHTS AND REQUESTS:**

You can submit your requests within the scope of the abovementioned rights to our Company by filling out the "Request Form on Personal Data", which can be found electronically at [www.drogsan.com.tr](http://www.drogsan.com.tr) or physically at our Company Headquarters, and sending such form through a notary public with a petition, using the registered electronic mail (KEP) address [drogsan@hs02.kep.tr](mailto:drogsan@hs02.kep.tr) via your electronic mail address that you notified to our Company and that is registered in our systems. Personal applications sent within this scope shall be accepted after authenticating your identity and shall be finalized based on its nature as soon as possible but within 30 days the latest. In case a written response is provided to your application, no fees shall be charged for up to 10 pages, and for every page above 10 pages, the transaction fee that is stipulated under Article 7 of the Communiqué on the Principles and Procedures for Applying to Data Controller may be charged. In case the response to the application is provided in a recording media such as a CD or a flash disk, the cost of recording media may be charged.

## **DATA CONTROLLER**

**DROGSAN İLAÇLARI SANAYİ VE TİCARET ANONİM ŞİRKETİ**