## **PRIVACY POLICY**

### Last Updated: 29.09.2023

This Privacy Policy describes how CRANIOCATCH MEDİKAL VE DENTAL BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ / CRANIOCATCH MEDICAL and DENTAL INFORMATION TECHNOLOGIES INC. (may be referred to as "we", "us", "Company" or "Craniocatch Inc.") collects, uses, transfers and protects personal data in connection with www.craniocatch.com ("website") and also with Craniocatch Software.

This Privacy Policy is prepared in compliance with the provisions of the General Data Protection Regulation ("GDPR") and other applicable data protection laws. The information in this Privacy Policy shall fulfil our information obligation on article 13 of GDPR and article 10 of Turkish Personal Data Protection Law No 6698 ("KVKK").

#### **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, we may collect 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. If you access our services through mobile devices, we may collect the unique ID and the IP address of your mobile device and also some other device identifiers such as operating system, Internet browser.

*Cookies and Web Beacons:* 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. Some parts of our Service and the emails we send may include tiny electronic elements called web beacons. These elements allow the Company to do things like tally the number of users who have viewed specific pages or accessed an email. They also help us gather website statistics, such as measuring the popularity of particular sections and ensuring the integrity of our systems and servers. You can learn more information by the Cookie Policy

### PURPOSES of PROCESSING PERSONAL DATA

We collect and store your personal information according to the Article 5 of GDPR for the following purposes:

- To provide and maintain the services,
- To plan business strategies,

- To conduct the information security process,
- To conduct client relations processes,

• To registrate identity, address, tax number and other information required for the identification of the owners and business partners of all kinds of works and transactions,

• To give information to the competent court, the Enforcement Office, institutions and / or organizations

## **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 (portal), 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 the General Principles of GDPR and KVKK.

Personal data may be shared with third parties with the explicit consent of users. 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**

Data subjects have the following rights:

- Information and access to personal data,
- Rectification and erasure ('right to be forgotten',
- Right to data portability,
- Right to object and automated individual decision-making,
- to request the rectification of the incomplete or inaccurate data, if any,
- Right to stop or limit processing of personal data,
- and the other rights regulated in GDPR and KVKK.

### **CHILDREN'S PRIVACY**

"Our Service is designed for users aged 13 and older. We do not intentionally collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and believe that your child has provided us with Personal Data, please contact Us. Should we become aware of unintentionally collecting Personal Data from anyone under 13 without verified parental consent, we will promptly remove that information from our servers.

## **UPDATES TO THIS PRIVACY POLICY**

We may update this Privacy Policy to reflect changes in our data processing practices or legal requirements. The most recent version will be posted on our website with the effective date.

## **APPLICATION FOR REQUESTING INFORMATION**

You may submit your requests regarding your rights mentioned above at <u>info@craniocatch.com</u> or <u>craniocatch@hs01.kep.tr</u> 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.

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