

LIVEWELL
PERSONAL DATA PROTECTION POLICY

1. Scope

1.1. The purpose of **this** personal data protection policy (“**Policy**”) is to ensure that Livewell Giyilebilir Sağlık Ürün ve Hizmet ve Teknolojileri San. ve Tic. A.Ş. (“**LiveWell**”) process personal data in accordance with the Personal Data Protection Law No. 6698 (“**Law**”) and related secondary legislation. Violation of the Law will be seriously handled by LiveWell and assessed within the scope of legal provisions and discipline procedures. For the purpose of the Law, the following definitions will be taken as basis:

1.1.1. Personal Data: Any information relating to an identified or identifiable natural person;

1.1.2. Processing of Personal Data: Any operation performed on personal data wholly or partly by automated means or non-automated means provided that it is a part of a data filing system; such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making it available for collection, categorization, preventing the use thereof;

1.1.3. Special Categories of Personal Data: Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data;

1.1.4. 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 filing system and LiveWell;

1.1.5. Data Processor: The natural or legal person who processes personal data on behalf of the data controller upon its authorization;

1.1.6. Data Subject: The natural person, whose personal data are processed;

1.1.7. Data Filing System: Any recording system used by LiveWell in which the Personal Data are structured and processed according to certain criteria;

1.1.8. Board: The Personal Data Protection Board;

1.1.9. Authority: The Personal Data Protection Authority;

1.1.10. Law: The Personal Data Protection Law No. 6698 published in the Official Gazette dated 07.04.2016 and numbered 29677.

1.2. Through this Policy, LiveWell aims to inform the Data Subject and the content of the Policy is as follows:

1.2.1. The content and categories of the Personal Data collected by LiveWell; their usage and transfer options;

- 1.2.2. The processing means of the Personal Data;
- 1.2.3. The protection means of the Personal Data;
- 1.2.4. The rights of the Data Subjects;
- 1.2.5. The measures taken regarding the protection of the Personal Data.

2. The Principles Regarding The Processing of the Personal Data

- 2.1. The purpose of LiveWell is the purposes set out in the articles of association registered and announced before the relevant trade registry office.
- 2.2. LiveWell produces wearable technological medical devices and provides smart mobile healthcare services enabling emergency response and offering medical consultancy for monitoring, measurement and remote treatment of the chronic diseases relating to blood sugar, heart, blood pressure etc., which require constant monitoring (collectively “**Service**”). *Health Intelligence Platform, Cardiom, ECG Diagnosis Algorithm and ECG Diagnosis Software* have been developed within the scope of this Service. Please visit www.livewell.com.tr and <http://www.cardiom.com.tr> to get more information on the Service.
- 2.3. LiveWell provides the Service to e-healthcare providers, hospitals, elderly care centers, insurance companies and related companies (“**Service Provider**”). The Service Providers process personal health data of the patients collected through the Service by their own health personnel.
- 2.4. LiveWell, regarding to its purpose, (may) process the Personal Data enumerated below collected from its board members, visitors, employees, employee candidates, suppliers, authorized persons of the Service Providers, their employees and the Service user doctors (“**Data Subject**”), within the scope of Article 5 and 6 of the Law, without the need to the Data Subject’s consent. *(The Personal Data enumerated below may differ pursuant to the Data Subject groups mentioned above.):*
 - 2.4.1. Name surname, (Turkish Republic) ID Number,
 - 2.4.2. Date of birth, place of birth, mother- father name, civil status, identity data including serial and sequence number of identification card; identity register copy; driving license,
 - 2.4.3. Bank account number,
 - 2.4.4. Social security number,
 - 2.4.5. Health data in the general health report,
 - 2.4.6. Passport photograph,
 - 2.4.7. Contact data including address, phone number, e-mail address,
 - 2.4.8. Name and surname of the dependents of employees,
 - 2.4.9. Workplace entry-exit records of the employees, timekeeping records of the employees,

2.4.10. Information regarding the military service; education and foreign language information/ copies of professional certificates; criminal record regarding criminal convictions and security measures,

2.4.11. Access records of Wi-Fi users of LiveWell,

2.4.12. Circular of signature or any document confirming the signature,

2.4.13. Photographs and video records taken due to security,

2.4.14. Vehicle registration plate.

2.5. Method, Legal Grounds and Purpose of the Personal Data Processing Within the Scope of the Law

LiveWell, physically and/or electronically, processes the Personal Data enumerated above within the commercial or employment relationship with the Data Subject on the grounds that *i*) it is expressly provided for by the laws and it is imperative to LiveWell to perform its legal obligation, *ii*) 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, *iii*) it is obligatory for the establishment, exercise or protection of any right, *iv*) processing of personal data is necessary for the legitimate interests of the data controller, provided that the processing shall not violate the fundamental rights and freedoms of the Data Subject by automated or non-automated means.

LiveWell processes the Personal Data to provide smart mobile healthcare services enabling emergency response and offering medical consultancy for monitoring, measurement and remote treatment of the chronic diseases relating to blood sugar, heart, blood pressure etc., which require constant monitoring; to carry out commercial activities; to fulfill its legal obligations foreseen for the employers under the labor and social security legislation, to comply with the tax legislation, for the management of accounting and tax processes, for internal and external auditing; to perform the obligations envisaged under the Law No. 5651, the Turkish Commercial Code No. 6102, the Turkish Obligations Code No. 6098 and the related legislation; to perform the employment contracts, to pay the employee salaries; to manage the human resources processes; to carry out personnel activities; to ensure order, adaptation and security in the workplace; to enable employees fulfilling the conditions to avail of minimum living allowance; to sign a contract with the Service Provider and to perform these contractual obligations, to conduct necessary work to provide and customize the Service; to provide cloud service regarding the data collected under the Service; to meet the customer satisfaction, to manage the customer relations and feedback processes; for commercial and legal dispute resolution; to keep track of the previous work; to make collections through virtual POS; to provide internet access to employees and visitors; to keep records of visitors, to ensure information and data security.

2.6. Method, Legal Grounds and Purpose of the Personal Data Processing Within the Scope of Explicit Consent

LiveWell, physically and/or electronically, process the Personal Data organized below, during the establishment or performance of the employment contract of commercial relationship by

automated and non-automated means in the presence of the explicit consent of the Data Subject for the following purposes only:

Personal Data	Purpose of Personal Data Processing
<ul style="list-style-type: none"> - Name and surname, - E-mail address. 	<ul style="list-style-type: none"> - LiveWell E-Newsletter Subscription - Conducting communication activities with third parties and conducting evaluation and feedback processes effectively - Carrying out marketing, promotion, campaign, advertisement and analysis activities - Sending commercial electronic messages
<ul style="list-style-type: none"> - Access records, - IP address. 	<ul style="list-style-type: none"> - Implementation of LiveWell Cookies Policies
Photos and video recordings taken at events; such as presentation, training, meeting, seminar etc.	<ul style="list-style-type: none"> - Carrying out marketing, promotion, campaign, advertisement and analysis activities
Finger print	<ul style="list-style-type: none"> - Keeping workplace entry-exit records of the employees

3. Method of Data Collection

LiveWell collects the Personal Data enumerated under Article 2.4 and 2.6 of this Policy through the following methods:

- 3.1. Electronic mail;
- 3.2. Fax;
- 3.3. Phone;
- 3.4. SMS;
- 3.5. Mail, Courier;
- 3.6. Website and social media accounts of LiveWell, Virtual Platforms;
- 3.7. Delivery by hand;
- 3.8. Contracts, employment application form.

4. Processing and Transfer of Personal Data

4.1. Processing and Transfer Within the Country

Livewell may process the Personal Data within the country and transfer the Personal Data to third natural or legal persons without the need to the explicit consent of the Data Subject under the following conditions:

- 4.1.1. It is expressly provided for by the laws;

- 4.1.2. It is compulsory for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid;
- 4.1.3. 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;
- 4.1.4. It is compulsory for compliance with a legal obligation to which LiveWell is subject;
- 4.1.5. Personal Data have been made public by the data subject himself/herself;
- 4.1.6. Data processing is compulsory for the establishment, exercise or protection of any right;
- 4.1.7. Processing of data is compulsory for the legitimate interests pursued by LiveWell and/or other Data Controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

4.2. Processing and Transfer of Special Categories of Personal Data

- 4.2.1. LiveWell may process and transfer special categories of Personal Data within the country, only with the explicit consent of the Data Subject.
- 4.2.2. Personal data, except for the health and sexual life data, may be processed without seeking the explicit consent of the Data Subject, in the cases provided for by the laws.
- 4.2.3. The health and sexual life data may only be processed without seeking the explicit consent of the Data Subject by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

4.3. Processing and Transfer Abroad

- 4.3.1. LiveWell may process and transfer the Personal Data abroad, only with the explicit consent of the Data Subject.
- 4.3.2. LiveWell may transfer the Personal Data abroad without the explicit consent of the Data Subject under the conditions referred to in Article 4.1 and 4.2 of the Policy and if one of the following conditions exist in the foreign country where the Personal Data are to be transferred;
 - a. Adequate protection is provided in the foreign country where the Personal Data are to be transferred;
 - b. In cases where there is not adequate protection, LiveWell may transfer the Personal Data upon the written commitment of LiveWell and the data controller(s) in the relevant foreign country for adequate protection and upon the authorization of the Board.

4.3.3. Without prejudice to the provisions of international agreements, in cases where interest of Turkey or the Data Subject will seriously get harmed, LiveWell may only transfer the Personal Data abroad upon the authorization of the Board, receiving the opinions of relevant public institutions and organizations.

5. Security of Personal Data

5.1. LiveWell shall take all kinds of technical and administrative measures to realize the following purposes regarding to provide an appropriate level of security:

5.1.1. Preventing unlawful processing of the Personal Data;

5.1.2. Preventing unlawful access to the Personal Data;

5.1.3. Ensuring protection of the Personal Data.

5.2. LiveWell is jointly liable with the Data Processor(s) on taking measures under Article 5.1 of the Policy, in case the processing of personal data is carried out by another natural or legal person on behalf of LiveWell.

5.3. LiveWell is obliged to carry out the necessary audits, or have them made, in its own institution or organization, in order to ensure the implementation of the provisions of the Law.

5.4. LiveWell and the Data Processor(s) shall not disclose the personal data that they have learned to anyone contrary to the provisions of this Law, neither shall they use such data other than the processing purposes. This obligation shall continue even after the end of their term of office.

5.5. In case the processed data are obtained by others by unlawful means, LiveWell shall communicate with the Data Subject and notify the breach to the Board within 72 hours. Where necessary, the Board may announce the breach on its official website or through any other way it deems appropriate.

6. The Rights of the Data Subject

6.1. Data Subject may use the rights listed below by applying to LiveWell:

6.1.1. ascertaining whether any Personal Data is processed or not;

6.1.2. requesting information related to the processed Personal Data, if processed;

6.1.3. ascertaining the purpose of processing Personal Data, and whether this data is used in compliance with the(se) purpose(s);

6.1.4. identifying third parties to whom the Personal Data is transferred within the country or abroad;

6.1.5. requesting rectification if the Personal Data is processed in an unsatisfactory or incorrect manner;

6.1.6. requesting erasure or destruction of the Personal Data within the framework of Article 7 of the Law;

- 6.1.7. requesting to send notification of the operations carried out in compliance with subparagraphs 6.1.5 and 6.1.6 to the third parties to whom the Personal Data had been transferred;
 - 6.1.8. objecting to the processing of the personal data, exclusively by automatic means, which results to an unfavorable consequence for the Data Subject and
 - 6.1.9. claiming compensation for the damages due to the unlawful processing of the personal data.
- 6.2. In order to exercise the rights mentioned in Article 6.1., the Data Subject shall convey the requests in writing, along with the information that will enable identification, to LiveWell through the following means of communication:
- 6.2.1. via e-mail to kvkk@livewell.com.tr; or
 - 6.2.2. via mail to the address *“Teknopark İstanbul Sanayi Mahallesi Teknopark Bulvarı No: 1 / 4A 309 Pendik İstanbul, Türkiye”*.

7. Precautions Related to Protection of Personal Data As Accurate and Updated

LiveWell protects the Personal as accurate and updated through the following methods:

- 7.1. Daily backups;
- 7.2. Firewall;
- 7.3. Antivirus programs;
- 7.4. Encryption systems for the access to virtual platforms and restriction on authorizations and keeping access logs;
- 7.5. Card, key and encrypted access systems to rooms and cabinets;
- 7.6. Anonymization of personal data whose processing purpose has ended;
- 7.7. Confidentiality agreements and confidentiality commitments signed with employees.

8. Amendments to the Personal Data Protection Policy

LiveWell may make amendments to this Policy, which are required due to its activities, or which are legally necessary. The amended Policy becomes valid through the publication on the website(s) <http://www.livewell.com.tr> and/or <http://www.cardiom.com.tr>.