

Personal Data Processing Notice

Data Controller Information:

Data Controller: Fc Global Assistance Tourism Travel Agency and Service Limited

Mersis Number: 0385180511100001

Address: Alibeyköy Neighborhood, Namık Kemal Street No:73/77 Eyüp/Istanbul

Customer Service: +90 850 360 10 01

Email: info@fcglobalassistance.com

Website: www.fcglobalassistance.com

DATA PRIVACY NOTICE

KVKK and GDPR Compliant Clarification Statement

As FC Global Assistance, in our capacity as data controller and pursuant to both the Turkish Personal Data Protection Law No. 6698 (KVKK) and the European General Data Protection Regulation (GDPR), we collect and process your personal and health data strictly in compliance with applicable laws and only for legitimate purposes including the provision of health services, fulfillment of legal obligations, enhancement of service quality, and management of emergency interventions and organizational processes.

Categories of Personal Data Collected:

- Identification information (e.g., name, surname, passport details)
- Health data (e.g., diagnosis, treatment, laboratory/test results, prescription details, medical data provided via IoT devices)
- Contact and business information (e.g., address, email, phone number)
- Location data and service usage history
- Security-related data (e.g., IP address, website login/logout records)
- Marketing data (e.g., customer behavior, information gathered through surveys and campaigns)
- Visual and audio records (e.g., photographs, call center recordings, surveillance footage)

Data Collection Methods:

Data is obtained automatically or manually through our digital platforms (Octavital), physical forms, hospital reports, port health authorities, testing centers, remote doctor consultations, and IoT devices.

Legal Basis for Processing:

Our processing activities are based on your explicit consent where required, the necessity to fulfill contractual obligations, compliance with legal requirements, protection of vital interests, and legitimate interests pursued by FC Global Assistance or third parties, ensuring these interests are balanced with your fundamental rights and freedoms.

Purposes of Processing Personal Data:

- Provision of remote health services (telemedicine, second opinion)
- Conducting diagnosis and treatment processes
- Reporting results of tests, laboratory analyses, and substance screenings
- Providing service notifications to companies and institutions
- Mandatory data sharing with authorized authorities (port health, P&I clubs, insurance companies)
- Issuing prescriptions and medical reports
- Managing emergency health referrals

Data Sharing and International Transfers:

Personal data may be shared with third parties strictly for the purposes outlined above, including contracted hospitals, healthcare institutions, authorized government bodies, insurance companies, corporate employers, and telemedicine providers. If any data transfer occurs to countries outside Turkey or the European Economic Area (EEA), such transfers will be conducted in compliance with applicable data protection laws, ensuring adequate safeguards such as standard contractual clauses or binding corporate rules are in place.

Data Security Measures:

We implement appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage. These measures are regularly reviewed and updated to ensure ongoing data security.

Data Retention Period:

Personal data is retained in accordance with relevant legislation and internal policies and is securely deleted or destroyed once the purpose of processing has been fulfilled or when retention is no longer legally required.

Rights of Data Subjects:

You have the following rights under KVKK and GDPR:

- To inquire whether your personal data is processed
- To access your personal data and obtain a copy thereof
- To learn the purpose of data processing and ensure your data is used accordingly
- To know the third parties (domestic or international) to whom your data is transferred
- To request correction of inaccurate or incomplete data
- To request deletion or destruction of your personal data in cases prescribed by law
- To object to data processing for legitimate interests or direct marketing purposes
- To request restriction of processing under certain conditions
- To data portability where applicable
- To object to decisions based solely on automated processing including profiling, if it produces legal effects or significantly affects you

To exercise any of these rights, you may submit a written request via email to info@fcglobalassistance.com. We will respond to your request within the time frames prescribed by law.

Right to Lodge a Complaint:

If you believe your personal data has been processed unlawfully, you have the right to lodge a complaint with the relevant supervisory authority.