

## PRIVACY POLICY

At FC Global Assistance Tourism Travel Agency and Services Limited (“Company”, “we”, or “us”), we are committed to safeguarding your personal data in compliance with the Turkish Personal Data Protection Law No. 6698 (KVKK) and the European Union General Data Protection Regulation (GDPR).

This Privacy Policy explains how we collect, process, store, and share your personal information and your rights regarding your data.

### 1. Categories of Personal Data Collected

We may collect the following categories of personal data:

- Identity Information: Name, surname, passport details, date of birth, etc.
- Health Data: Medical diagnosis, treatment records, laboratory/test results, prescriptions, and data obtained via medical devices and IoT systems.
- Contact Information: Address, phone number, email address, emergency contacts.
- Location and Service Usage Data: GPS/location data, service access history.
- Technical and Digital Data: IP address, access logs, browser and device information, application usage data.
- Visual and Audio Data: Photographs, voice recordings, and video footage (e.g., during remote consultations or service interactions).

### 2. Methods of Data Collection

Your personal data may be collected through the following channels:

- Online forms and digital platforms (e.g., mobile apps, websites)
- Physical forms and consent documents
- Healthcare institutions, test centers, and laboratories
- Remote doctor consultations and telemedicine tools
- IoT and wearable health monitoring devices

### 3. Purposes of Data Processing

Your personal data is processed for the following purposes:

- To provide and manage medical and healthcare services
- To comply with national and international legal and regulatory obligations
- To improve our services, operational processes, and user experience
- For marketing, information, and communication activities (with your consent, where applicable)
- For emergency response, coordination, and continuity of service delivery

### 4. Legal Basis for Processing

We process your personal data based on:

- Your explicit consent, where required (particularly for health data),
- Our legal obligations,
- Contractual necessity (e.g., providing services you request),
- Our legitimate interests, provided that your fundamental rights are not adversely affected.

## 5. Data Sharing and Transfers

Your personal data may be shared with:

- Contracted healthcare providers, test laboratories, insurance companies, and telemedicine partners
- Authorized public institutions and regulatory bodies (e.g., Ministry of Health, judicial authorities)
- Third-party service providers (e.g., IT support, data hosting) under confidentiality agreements
- Cross-border transfers of your personal data are conducted in accordance with applicable legal safeguards and only where necessary for service provision or regulatory compliance.

## 6. Data Security

We implement strict technical and organizational measures to ensure the confidentiality, integrity, and security of your personal data, including:

- Data encryption,
- Access control,
- Regular system audits,
- Staff confidentiality training.

## 7. Data Retention

Your personal data is retained:

- For the duration necessary to fulfill the purposes for which it was collected,
- In accordance with legal retention periods and our internal policies,
- After which it is securely deleted or anonymized unless otherwise required by law.

## 8. Your Data Subject Rights

Under KVKK and GDPR, you have the right to:

- Access and obtain a copy of your personal data,
- Request correction of inaccurate or incomplete data,
- Request deletion of your data under applicable conditions,
- Object to or restrict processing in certain cases,
- Exercise your right to data portability.

To exercise your rights or to ask questions regarding data protection, you may contact us at:

[info@fcglobalassistance.com](mailto:info@fcglobalassistance.com)

## 9. Updates to This Policy

This Privacy Policy may be updated to reflect changes in our data processing activities or legal obligations. The most current version will always be available on our website.