

1. OBJECTIVE

This Disclosure Form has been prepared by Türkiye Sigorta Anonim Şirketi (the “Türkiye Sigorta” or the “Company”), acting as the data controller, within the scope of Article 10 of Personal Data Protection Law No. 6698 (the “Law”) and the Communiqué on the Principles and Procedures to be Followed in Fulfilling the Obligation to Inform.

We show utmost sensitivity regarding the security of your personal data.

We hereby inform you that all your personal data, including your special categories of personal data that you have given/will give to the Company by virtue of the fact that you are a health insured/customer of the Company and/or, otherwise obtained by the Company:

- will be recorded, stored, maintained, reorganized, shared with the institutions authorized by law to request such personal data, and transferred to domestic or foreign third parties under such conditions as stipulated by the Law, or otherwise transferred, classified and processed as defined in the Law, and may be subject to other procedures as required by the Law,
- provided that the accuracy and the most up-to-date version of the personal data you have notified the Company are maintained,
- for such purposes that necessitate the processing of your personal data, in a limited and proportional manner.

This Disclosure Form adopts the continuation and development of the activities carried out by Türkiye Sigorta in accordance with the principles set out in the Law.

2. PERSONAL DATA COLLECTION AND PROCEDURE FOR INDIVIDUAL HEALTH CUSTOMERS

The Company will process your personal data in accordance with the purposes as specified in this Disclosure Form, without prejudice to your rights and freedoms. If there is any change in the purpose of processing your personal data, additional consent will be obtained from you.

The personal data belonging to customers collected and used by the Company are particularly as follows:

Content of Personal Data

Identification Data	Documents such as driver’s license and identity card containing information like full name, Turkish identification number, tax identification number, passport number, nationality, mother’s name & father’s name, place of birth, date of birth, gender, as well as signature/paraph, insured person’s full name, name and surname of the policy owner, name and surname of the insured candidate, signature circular.
Contact Data	Phone number, fax number, full address, country, province, email address, name and surname of the insured, address details.
Customer Transaction Data	Records related to the use of products and services, as well as information such as instructions and requests necessary for the customer to use the products and services, customer number, contract numbers, transaction date, account number, and similar information.
Special Categories of Personal Data	Health insurance application form, disability and incapacity status, blood type information, personal health information, information on prosthetics/devices used, test results, treating doctor, treatment information, chronic, hereditary and infectious diseases, surgeries undergone, past treatments, illnesses, medications used, examination information, treating hospital, treating outpatient clinic, health reports, disease diagnosis information, blood type and religion information on the identity card, and information related to criminal convictions or investigations for the purpose of fulfilling legal obligations.
Other Data	The health institution affiliated with, type of social security, insured candidate’s height/weight
Physical Space Security Data	Personal data related to records and documents taken during entry into the physical space and while staying inside the physical space; camera recordings, records taken at the security point, etc.
Financial Data	Bank name, IBAN information, gross premium and compensation amount, credit card information.

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Risk Management Data	Information obtained during the execution of insurance risk processes.
Professional Experience Data	Business and professional information, such as job title, education status.
Location Data	Address details.

Your personal data is collected by the authorized departments, the Head Office, as well as our authorized suppliers, agencies, brokers, employees, including our business partners, based on your consent, both before and after the establishment of the contractual relationship and throughout its continuation.

Your personal data is collected by individuals or legal persons authorized by the Company, through obtaining insured health information from institutions, for reasons stipulated by law through third parties and our systems, through all kinds of information, documents, and records obtained from public institutions and organizations for reasons stipulated by law, in physical or electronic environments, and through the cameras we have placed in the Company buildings, via email, phone, website, various contracts, forms kept on paper, and minutes, using both automated and non-automated methods in verbal, written, or electronic environments.

3. PURPOSES AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

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Your personal and specially qualified personal data may be processed and transferred in accordance with the provisions set forth in Articles 5/2 and 6/3 of the Law, and especially for the purpose of establishing and fulfilling a contract, as explicitly provided in the laws, and for the establishment, use, and protection of a right.

Your personal data is processed by automatic or non-automatic methods for the purpose of fulfilling legal obligations and requirements as required by Personal Data Protection Law, Insurance Law, Regulation on Private Health Insurance, Regulation on Insurance Support Services, Turkish Commercial Code, Turkish Code of Obligations, Law on the Prevention of the Laundering of Proceeds of Crime, and other legislation.

The purposes of processing personal data are as follows and may be updated in accordance with the Company policies and obligations under applicable legislation:

- Conducting intelligence activities within the scope of insurance processes;
- Execution of insurance, reinsurance, and recourse processes and formalities;
- Actuarial calculations to be made within the framework of risk and acceptance principles;
- Generation of insurance pricing schedules;
- Carrying out the necessary procedures before the authorized public institutions and organizations;
- Provision of products and services for your needs;
- Filing the offer in the system, which is sent to the customer;
- Filing the documents in the system, which are necessary within the scope of the insurance contract;
- Conducting customer evaluation studies;
- Evaluation of insured individuals with health data from contracted enterprises;
- Customer identification and querying, conducting risky disease studies;
- Obtaining health information from public institutions and organizations;
- Implementation of distance sales contract processes;
- Execution of collection and refund transactions;
- Completion of the offer and amendment formalities, as well as the entry of offers, amendments, and policies into the system, and conducting risk assessments to prepare policies;
- Performing identification procedures within the scope of MASAK Compliance Program;
- Detection of incomplete declarations;
- Execution of credit card collection processes;
- Transmission of information regarding the transition of insured individuals to other insurance companies and the management of transition processes;
- Registration of insurance application forms in the system;
- Execution of policy cancellation processes;

- Providing support services after sales;
- Data sharing with assistance companies within the scope of services provided to the insured;
- Entry of data transmitted by business partners into the system;
- Reporting of claims and evaluation of provisions;
- Execution and tracking of claims indemnity payments;
- Reporting to authorized enterprises for the fulfillment of obligations under applicable legislation;
 - Execution of co-insurance transactions;
- Execution of gift voucher, credit card bonus promotion processes;
- Execution of customer satisfaction processes and customer relationship management;
- Execution of request and complaint processes;
- Fulfillment of the obligation to retain information/documents for the purpose of fulfilling obligations under applicable legislation;
- Execution of internal control and audit processes;
- Conducting statistical studies when necessary;
- Processing of your personal and sensitive personal data for the purpose of conducting transactions with brokers and reinsurance companies abroad in order to carry out reinsurer activities in order to reinsure risks, based on your explicit consent;
- Processing of your special categories of personal data by the authorized agent/broker in order to inform you about the results of provision evaluation and to carry out your request and complaint processes in order to provide services arising from the policy, based on your explicit consent;
- Promotion and marketing of products and services, cross-selling, surveys, statistical analyses and market researches through targeting, profiling and analysis in line with your preferences and tastes, as part of your explicit consent and permission regarding the sending of commercial electronic messages so as to enhance service quality and/or to conduct marketing analyzes.

4. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Your personal data and special categories of personal data may be transferred to third parties in Türkiye or abroad for the said purposes and in accordance with the conditions as specified in Articles 8 and 9 of the Law.

Taking into account the provisions of Personal Data Protection Law, Insurance Law, Regulation on Private Health Insurances, Regulation on Insurance Support Services, Turkish Commercial Code, Turkish Code of Obligations, Law on Prevention of Laundering Proceeds of Crime, your personal data and special categories of personal data may be transferred to third parties from which it receives services, companies providing cloud storage services, authorized agents/brokers, insurance companies, banks, cargo companies, service providers from which it receives medical consultancy, related suppliers, business partners, assistance companies, reinsurer companies, independent audit company, Financial Crimes Investigation Board, Association of Insurance and Reinsurance Companies of Turkey, Insurance Surveillance and Information Center, authorized public institutions and organizations, health institutions, workplace physicians of the company, judicial authorities, actuaries, alternative dispute resolution authorities, authorized attorneys and, if required by the Company's activities, subsidiaries, joint ventures, shareholder organizations of Türkiye Sigorta Anonim Şirketi and all their affiliates and, upon your explicit consent, brokers and reinsurance companies located abroad, for the fulfillment of the requirements of the insurance contract, the fulfillment of the Company's obligations under the laws and legislation, the determination of your information in order to prevent loss of rights in all kinds of commercial transactions you have entered into with the Company, the collection reconciliations, the completion of provision processes, the acquisition of expert opinions from contracted enterprises and individuals in health insurance processes, researching and obtaining health information of the insured from institutions, issuing and renewing policies, carrying out transition transactions between insurance companies, following up indemnity payment transactions, performing risk acceptance, completing actuarial calculations, and within the scope of the provision of services arising from the policy.

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Your personal data will be retained for a reasonable period as laid down in applicable legislation or until the purpose of processing ceases, and in any case, for the duration of the statutory limitation periods.

5. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

In accordance with Article 12 of the Law, our Company takes all necessary technical and administrative measures to prevent unlawful processing of personal data and unlawful access to personal data, and to ensure the appropriate level of security to ensure the protection of personal data.

6. RIGHTS OF THE CUSTOMER

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Pursuant to Article 11 of the Law, you can apply to the Company to request information regarding the following matters about your personal data:

- a.** to find out whether your personal data has been processed;
- b.** to request for information if personal data has been already processed;
- c.** to ask for information about the purpose of processing your personal data and whether it is used for the intended purpose as specified;
- d.** to know third parties to whom your personal data is transferred domestically or abroad;
- e.** to ask for rectification in case your personal data has been processed incompletely or incorrectly, and to request that the process conducted in this context be notified to third parties to whom your personal data has been transferred;
- f.** to ask for the deletion, destruction or anonymization of your personal data, and to request that the process conducted in this context be notified to third parties to whom your personal data has been transferred, in the event that the reasons necessitating its processing cease to exist;
- g.** to object to the occurrence of a result against you by analyzing the data processed solely through automated systems; and
- h.** to claim compensation for the damage arising from the unlawful processing of your personal data.

You can submit your requests under the Law to the Company in writing, along with identity verification documents, either in person or by using a registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the electronic mail address previously notified to the Company by the relevant person and registered in our system, or by other methods determined by the Board. For such requests, you can access the Data Subject's Application Form at "<https://www.turkiyesigorta.com.tr>". In accordance with Article 13 of the Law, the Company will respond to your application requests on a free-of-charge basis no later than 30 (thirty) days from the date of notification to the Company, depending on the nature of the request. In the event of the rejection of the request, the reason(s) for such rejection will be communicated to you in writing or electronically with the justifications.

The Company reserves the right to make any changes to this Disclosure Form at any time for such reasons as required by the Law, ancillary regulations, and Board decisions. Both any changes to this Disclosure Form and the updated version will take effect immediately as of the date they are notified to you. The most up-to-date version of this Disclosure Form is available at "<https://www.turkiyesigorta.com.tr/yasalbilgilendirme/kisisel-verilerin-korunmasi/sigorta>".