

COOKIE POLICY

This cookie policy is about the regulation of the rules regarding the cookies used on the <https://ifl.com.tr/en> website of İFL Pharma İlaç Sanayi Ve Ticaret Anonim Şirketi (İFL Pharma Pharmaceutical Industry and Trade Inc.).

DATA CONTROLLER :

Within the scope of this policy, the data controller that processes the personal data of the relevant person site users is İFL PHARMA İLAÇ SANAYİ VE TİCARET ANONİM ŞİRKETİ (İFL Pharma Pharmaceutical Industry and Trade Inc.), which is located at Bahçelievler Mah. 323/1 Cad. C Blok Gazi Üniversitesi Teknokent Binası No: 10/50c İç Kapı No: 108 Gölbaşı / Ankara, registered with Ankara Trade Registry Office with the registration number 462411, Gölbaşı TO-tax no 4701260975 and mersis number 0470126097500001.

1. DEFINITIONS:

IFL PHARMA / COMPANY: IFL Pharma İlaç Sanayi ve Ticaret Anonim Şirketi(İFL Pharma Pharmaceutical Industry and Trade Inc.)

SİTE: <https://ifl.com.tr/en> domain name and all subdomains,

USER: Any real and legal person who visits/uses the site in any way,

COOKIE: The diagnostic file used on the site and left on the user's computer during the visit to the site,

PDPL/LPPD: Law No. 6698 on the Protection of Personal Data,

INSTITUTION; Personal Data Protection Authority,

2. PURPOSE:

The purpose of this policy is to bring together the rules regarding the placement of cookies used on the SITE on the USERS' device,

- The processing of personal data obtained and processed automatically,
- Which types of cookies are used for which purposes,
- How these cookies will be managed,
- Clarification and, where necessary, explicit consent processes.

3. TYPES OF COOKIES USED ON THE SITE:

As IFL PHARMA, within the scope of PDPL and relevant legislation, it is essential to take the utmost care to process the personal data of the relevant persons in accordance with the law and to provide maximum benefit with minimum data.

In this direction, it is ensured that the personal data processed through the cookies used on the SITE are kept to a minimum and that the USER is offered an option as OPT-IN in terms of cookie applications other than cookies that are mandatory for the operation of the site.

Categories of cookies used on the SITE:

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VERSION NO	V.1
DOCUMENT NO	IFL-ENG0007

Mandatory Cookies are used to enable the USER to use the SITE (for example, filling out forms, remembering cookie preferences, language preferences). The legal basis for processing personal data through these cookies is the provisions of Article 5/2-c of the LPPD "Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract" and Article 5/2-f of the LPPD "Processing of data is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject".

Performance/Functionality Cookies are cookies that enable the collection of statistical information in order to analyze the USER's behavior. These cookies are used to improve the site and are used by IFL PHARMA to estimate the number of unique visitors, to detect search engine keywords that direct the user to the site or to monitor the navigation status on the site. The aforementioned determinations and analyzes are carried out through our business partners located in Turkey and abroad. Personal data collected through these cookies are processed and transferred abroad with the USER's explicit consent within the scope of Article 5/1 of the LPPD.

Advertising/Marketing cookies are used to profile the USER and to display USER-specific products or campaigns. The cookies obtained through these cookies are set by our advertising partners based in Turkey and abroad. Personal data collected through these cookies are processed and transferred abroad with the USER's explicit consent within the scope of Article 5/1 of the LPPD.

Table of cookies used on the SITE:

Cookie's Name	Cookie's Purpose	Category of Cookie	Cookie's Party	Cookie's Duration
_ga_WWXZS5NBG7	This cookie is used by Google Analytics to maintain the session state.	Performance / Functionality	1st Party	729 days
_ga	The cookie's name is associated with Google Universal Analytics, an important update to Google's more widely used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a customer identifier. It is included in every page request on a site and used to calculate visitor, session and campaign data for site analytics reports.	Performance / Functionality	1st Party	729 days
cookiebot	This cookie allows visitors to make their cookie preferences, remember the preferences made and change them later	Mandatory	1st Party	12 Months

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4. COOKIE MANAGEMENT APPLICATION :

Cookie Management Application is a software that enables the fulfillment of preferences in the background and stores these preferences with an interface that allows the USER to make a choice in the foreground regarding the cookies used on the site.

Within the scope of cookie management application, the USER's IP address and the date-hour-minute-second s/he approves are recorded and a confirmation ID is assigned to the USER.

It is important to confirm that the cookie management application is working correctly and fulfills USER preferences.

It is controlled that the cookie management application available or to be used in the future on the SITE is not blocked by browsers or ad blocking software (such as Adblock, Ghostery).

Within the scope of cookie management application, perception management of USERS to choose a certain option is not used by using factors such as color, font, size in the application interface.

In the event that the interface is turned off by the USER without any preference in the cookie management application, other cookies other than those required for the operation of the SITE will not be active and will not be installed on the USER's device.

5. FULFILLMENT OF THE OBLIGATION OF CLARIFICATION:

As soon as the USER first logs in to any page of the SITE, the USER is informed that personal data is being processed through cookies within the framework of the Clarification obligation under Article 10 of the LPPD regarding the cookies used in the SITE.

This clarification is carried out in a layered manner through the cookie management application, the details of which are specified in Article 4 of this policy.

Accordingly, when the USER visits the SITE on any page of the SITE, the cookie management application appears to the USER in the form of a pop-up page. The welcome text of the application contains general information about the processing of personal data through cookies and links to the actual cookie clarification text and this cookie policy.

6. EXPLICIT CONSENT :

Within the scope of the cookie types listed in Article 3 of this policy, it is ensured that the USER's explicit consent is obtained through the cookie management application in terms of cookies that will only be active with the USER's explicit consent.

In terms of explicit consent, if the USER does not accept cookies that require explicit consent, it is essential that the USER is not prevented from accessing the site.

Within the scope of the cookie management application, users are offered 3 options. These options are:

- Accept All
- Reject All

- Preferences

6.1. “ACCEPT ALL” OPTION:

When the USER chooses the "Accept All" option, cookies that can be used with explicit consent are activated and installed on the USER's device.

Since explicit consent has been given, in terms of proof, the IP address at which the USER enters the site and the date-hour-minute-second s/he gives consent are recorded.

After this option is selected, the cookie management application will not appear before the USER again for a period of time equal to the duration of the cookie. Only a link or icon that the USER can access the cookie management application from each page is shown to the USER on all pages.

It is possible for the USER who gives explicit consent to withdraw his/her explicit consent at any time through the cookie management application. The USER who has chosen the "Accept All" option can re-enable their cookie preferences and withdraw their explicit consent by clicking on the link or icon related to the cookie management application specified in the previous paragraph and shown on each page.

6.2. “REJECT ALL” OPTION :

If the "Reject All" option is selected by the USER, the cookies used through explicit consent remain inactive and are not installed on the user's device.

Except for cookies that can be used with explicit consent, cookies that are mandatory for the operation of the site are not within this scope and are installed on the USER's device in any case.

The USER who prefers the "Reject All" option is always free to change this preference with the cookie management application.

If the USER closes the cookie management application opened at the first access to the SITE without any preference, it is assumed that s/he prefers the "REJECT ALL" option.

6.3. “PREFERENCES” OPTION :

If some of the cookies that can be processed with explicit consent are approved and some of them are rejected by the USER, the "Preferences" option is used.

By clicking on the "Preferences" option, the USER is presented with the categories of cookies used on the site with checkboxes.

It is essential that the checkboxes are opened without approval; they are organized as OPT-IN so that they can be approved by the USER actively giving approval. The exception are mandatory cookies, which are displayed as approved and passive.

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Cookies whose checkbox is checked by the USER become active and are installed on the USER's device. Cookies whose Checkbox is not checked will not be activated and installed on the USER's device.

It is possible for the USER who gives explicit consent to withdraw his/her explicit consent at any time through the cookie management application. The USER who has checked the checkbox in the PREFERENCES option can re-make their cookie preferences and withdraw their explicit consent in this way by clicking on the link or icon related to the cookie management application shown on each page.

7. CLARIFICATION AND EXPLICIT CONSENT TEXTS :

Clarification texts and explicit consent texts for USERS who are the relevant person regarding the use of cookies are available on the SITE in a way that USERS can easily access.

Clarification for USERS is realized in a layered manner by providing preliminary information through the cookie management application and providing a link to the clarification text in the preliminary information.

The explicit consent of the USERS as relevant person status is deemed to have been obtained by giving active consent to the USER's cookie preferences through the cookie management application. Within the scope of the cookie management application, there is also a link to the page where the explicit consent text is located.

Clarification and explicit consent texts regarding the use of cookies are recorded with date and version numbers.

8. PERIODIC INSPECTION :

Cookies used on the SITE are checked in 3 (three) monthly periods. In case of a situation different from the previous one with the use of new cookies in these controls or on the SITE, the cookie management application, clarification texts and explicit consent texts are updated according to the new situation.

9. RIGHTS OF THE PERSONS CONCERNED:

The USER, who is the relevant person within the scope of the Law, is as follows under Article 11 of the Law:

- a. To learn whether personal data is being processed,
- b. To request information if their personal data has been processed,
- c. To learn the purpose of processing the personal data and whether they are used in line with this purpose,
- ç. To know about the third parties to whom personal data are transferred domestically or abroad,
- d. To request data correction in the event that they were processed incompletely or inaccurately,

- e. To request personal data to be erased or destroyed under the conditions laid down in the Article 7,
- f. To request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom personal data has been transferred,
- g. To object to the appearance of a result against the person himself due to analyzing the processed data exclusively through automated systems,
- ğ. To demand compensation for the damage in case of damage due to unlawful processing of personal data,

THE USER may exercise the rights specified by contacting IFL Pharma through the communication channels specified in Article 10 of this Policy.

IFL PHARMA shall respond to the USER within 30 days following receipt of the request.

10. CONTACT INFORMATION

In order to exercise their rights as the relevant person, USERS

- i. can make a request to İFL PHARMA located at C Blok Gazi Üniversitesi Teknokent Binası No: 10/50c İç Kapı No: 108 Gölbaşı / Ankara in person or by registered mail with return receipt requested,
 - ii. By making requests by submitting your requests through a notary public in order to determine your identity and not to provide information to false or unauthorized persons,
 - iii. By using your e-mail address previously notified to our Company by you and registered in our system, by sending an e-mail to our address kvkk@ifl.com.tr,
 - iv. By sending an e-mail to our Company's registered e-mail address iflpharma@hs01.kep.tr via your own KEP address,
 - v. By ensuring that your identity is confirmed,
- by applying through other procedures specified in the relevant legislation,

11. ENFORCEMENT AND AMENDMENT

This Cookie Policy enters into force as soon as it is published on the SITE.

IFL PHARMA may update the content of this Cookie Policy at any time to keep its data protection policies up to date and in compliance with the relevant legislation.

The Amended Cookie Policy is published on the Company's website. Amendments to the Cookie Policy shall enter into force on the date of publication on the SITE.