

DATE	01/01/2023
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## **CLARIFICATION TEXT ON THE USE OF USER COMMENTS**

### **1. METHOD OF COLLECTING PERSONAL DATA :**

Within the scope of the Free of Charge Personal Data Processing Contract (CONTRACT) you have signed with IFL PHARMA, your personal data subject to the contract is collected using non-automatic methods by the method of transmitting it to IFL PHARMA based on your explicit consent.

### **2. PERSONAL DATA COLLECTED :**

Within the scope of the CONTRACT, the name and surname of the relevant person, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photographs and videos, the health data of the relevant person regarding the pre-use and post-use of the products offered by the COMPANY for human health are collected.

### **3. LEGAL REASONS AND PURPOSES OF PERSONAL DATA PROCESSING:**

Personal data transmitted to IFL PHARMA within the scope of the CONTRACT are processed

- a. In order to advertise and promote IFL PHARMA and its sub-brands and products and services to third parties and to increase the recognition level before third parties,
  - i. Pursuant to Article 5/1 of the Law, based on explicit consent,
    - Regarding the use of the products offered by the COMPANY for human health, the image of the relevant person in the photos and videos, the data set consisting of the health data of the relevant person before and after use, the websites and social media accounts under the management of IFL PHARMA,
  - ii. Within the scope of Article 5/2-c of the Law, based on the legal reason that it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
    - Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,
- b. To be able to defend the legal rights of IFL PHARMA and to manage the clarification processes with explicit consent,
  - i. Within the scope of Article 5/2-e of the Law, based on the legal reason that data processing is mandatory for the establishment, exercise or protection of a right and that it is mandatory for the data controller to fulfill its legal obligation,



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- Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,

are processed.

#### **4. TRANSFER OF PERSONAL DATA:**

Personal data transmitted to IFL PHARMA within the scope of the CONTRACT can be transferred

- a. In order to advertise and promote IFL PHARMA and its sub-brands and products and services to third parties and to increase the recognition level before third parties,
  - i. Based on explicit consent pursuant to Article 5/1 of the Law, the data set consisting of the health data of the relevant person regarding the use of the products offered by the COMPANY for human health, the image of the relevant person in the photographs and videos, before and after use,
  - ii. Within the scope of Article 5/2-c of the Law, provided that it is directly related to the establishment or performance of a contract, based on the legal reason that it is necessary to process the personal data of the parties to the contract, Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,
    - To companies providing social media services at home and abroad,
    - To supplier companies that provide infrastructure in the field of information services,
    - to business partners providing services for the execution of advertising and promotional activities,
- b. Based on the legal reason that data processing is mandatory for the establishment, exercise or protection of a right pursuant to Article 5/2-e of the Law and that it is mandatory for the data controller to fulfill its legal obligation pursuant to Article 5/2-ç of the Law,
  - i. Name-surname, comments and evaluations about the products and services offered by IFL PHARMA, the image of the relevant person in the photos and videos,
    - To lawyers, notaries,
    - To regulatory and supervisory institutions and courts and prosecutors' offices authorized to request your personal data.

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