

Cordamed Biomedikal Mühendislik Anonim Şirketi and Intuitive Surgical Sàrl

Joint Privacy Notice

Effective Date: 1 January 2024

This is a Joint Privacy Notice (“Notice”) by Cordamed Biomedikal Mühendislik Anonim Şirketi (“Distributor”), and Intuitive Surgical Sàrl (Data Controller Representative: Fırat Yalçın, with professional address at Pekin Pekin - 10 Lamartine Caddesi, Taksim 34437, Türkiye) and its affiliated companies (collectively, “Intuitive”); (Intuitive and Distributor may be collectively referred to as “we”, “our”). This Notice applies to Personal Data that is jointly collected and processed by Distributor and Intuitive in relation to Intuitive Technology, including sales, marketing, maintenance and services (“Joint Scope”).

Intuitive manufactures computer-enhanced medical technology, including the da Vinci Surgical technology and other innovative, minimally invasive robotic-assisted technology (collectively, “Technology”). Distributor is a distributor of medical devices, including Intuitive Technology.

For the purposes of this Notice, “Personal Data” means any information relating to an identified or identifiable natural person as defined by the European General Data Protection Regulation (“GDPR”) and Law No. 6698, or any other data privacy law that may supersede or complement it. The joint mission and focus of Distributor and Intuitive is to operate transparently, in a way that protects the rights and preserves the trust of everybody whose Personal Data is collected or used by Distributor or Intuitive.

Personal Data covered by this Notice is collected where (i) it is expressly provided by law, (ii) it is directly related to the establishment or performance of the contract, (iii) it is necessary for compliance with our legal obligations, (iv) legitimate interests of Distributor and/or Intuitive, provided that the processing shall not violate your fundamental rights and freedoms, or by acquiring your explicit consent. Distributor and Intuitive may additionally provide individual privacy notices for selected services that use Personal Data. If you are a user of such services, please refer to such service specific privacy notices for additional details.

With this objective, the general use and collection of Personal Data by Distributor and Intuitive is guided by the following principles:

- We comply with all applicable data privacy laws and regulations
- We do not sell your Personal Data to anyone
- We store data with industry-standard information technology and cloud services, following industry standard practices to maintain confidentiality, integrity and availability.

Contact Details

Distributor and Intuitive are both joint controllers of your Personal Data.

For Distributor:

Principal locations:

- Yeni Sahra, Yavuz Selim Cd. No:17, 34746 Ataşehir/İstanbul, Türkiye

To exercise your rights, to obtain details of our data transfer safeguards, or for any other questions related to Personal Data, you may contact Distributor at kvkk@cordamed.com.tr. When necessary, Distributor may request identifying information from you to confirm your identity. Distributor will respond to requests in accordance with the Data Protection Law.

For Intuitive:

- Intuitive Surgical Srl, 1 Chemin des Mriers, 1170 Aubonne, Switzerland

You may find additional contact information here:

<https://www.intuitivesurgical.com/company/locations-representation/>

To exercise your rights, to obtain details of our data transfer safeguards, or for any other questions related to Personal Data, you may contact Intuitive’s Data Privacy Officer by emailing data.privacy@intusurg.com or the Data Controller Representative of Intuitive within Trkiye (Firat Yalcin, with professional address at Pekin Pekin - 10 Lamartine Caddesi, Taksim 34437, Trkiye). When necessary, Intuitive may request identifying information from you to confirm your identity. Intuitive will respond to requests in accordance with the Data Protection Law.

Collection and Use of Personal Data

Intuitive Website Users

If you complete web forms on Intuitive websites, on the basis of your explicit consent to manage customer relationships, Intuitive may collect the following information:

Personal identification data like name, contact details, time zone and preferred language.
Professional data like title, role, employer, professional specialty, professional interests and identification number.
And any other information that you choose to provide to us

Intuitive may use the Personal Data of Intuitive website users for purposes including:

Creating aggregated statistics on website usage
Responding to your requests you have submitted through our website
Providing you information about our current and future products and services
Conducting market research
Improving our products or services
Providing a general resource for our research and business development
As necessary for network and information security, fraud prevention, reporting suspected criminal acts, and for ensuring compliance with the applicable laws and regulations

Third Party Representatives

Within the Joint Scope, if you are an employee, director, officer, agent, consultant, advisor (“Representative”) of Distributor’s or Intuitive’s customers, suppliers, service providers, consultants, distributors, regulatory agencies and others (“Third Party”) with a professional relationship or an interest related to Intuitive’s or related products or services, we typically collect the following type of Personal Data:

Identification data like name, phone number, email address and postal address
Professional data like employer, work contact information and job title

In addition, depending on your relationship with Distributor or Intuitive, we may also collect other information from you, such as:

Identification data like date of birth and passport number
Personal characteristics like travel and meal preferences (For example, to allow for travel and catering arrangements for events)
Professional data like resume, professional memberships, training and travel records
Financial data like compensation and bank account details (For example, to allow payment for speaking engagements, consulting or other services provided)
Recordings like pictures, audio or video
Profiling data like professional interests
Any other information you choose to provide to us

The purposes for which we may process Personal Data and the legal bases on which we may perform such processing are:

Legal basis for processing	Purposes of processing
Consent	Relationship and contract management with customer entities
	Sales, order fulfilment, distribution and invoicing of products and services with customer entities
	Purchasing products and services from vendors
	Coordinating support and preventative maintenance of our products
	Coordinating travel, site visits and other events
	Evaluating and coordinating clinical trials and related studies and projects
	Customer efficiency, cost saving, process and program performance
	Improving our products, services and processes e.g. compensation analysis, budgeting, planning, market research and analysis, surveys, providing performance information, sponsored agreements
	Network security
	Research and business development.
	Marketing and providing information about our products and services
	Coordinating travel, site visits and other events

Contract	Contracting for services with healthcare professionals or other individuals
	Employee training
	Coordinating travel, site visits and other events
	Evaluating and coordinating clinical trials and related studies and projects
Legal obligation	Complaints handling
	Evaluating and coordinating clinical trials and related studies and projects
	Ensuring compliance with applicable laws and regulations, e.g. legal advice, negotiation, fraud prevention and healthcare compliance

Users of Intuitive Technology

In addition, within the Joint Scope, while being a Third Party Representative, you may also be a User of Intuitive Technology if you are a surgeon, hospital resident or fellow, medical student, proctor or otherwise use, have used, or may use medical devices manufactured by Intuitive. From Users of Intuitive Technology we may collect:

Professional data relevant to the use of our products like professional experience, training related to Intuitive technology, and procedure related information
Ergonomic and other user-defined system settings that are associated with a user-defined identifier

Additional purposes for which we may process Personal Data of Users of Intuitive Technology and the legal basis on which we may perform such processing are:

Legal basis	Purposes of processing
Consent	Learning and professional education: course enrollments, training recommendations and management
	Proctoring, speaking engagements and consultancy related interactions
	Procedure reporting
	Drafting reports that can provide insights into clinical outcomes data, procedure efficiency and similar insights

Personal Data transfers and third party access

We may share Personal Data with affiliates of Distributor or of Intuitive. If we transfer your data to another data controller, for example, when signing you up for a training provided by a third-party training center, we do that only by acquiring your explicit consent. We may also use service providers to process Personal Data on our behalf, for example to provide hosting, communications and logistics services, market research and surveys, database and analytics services, as well as training centers, affiliates within the Intuitive group of companies, attorneys, accountants and banks.

We may be required to disclose, and may disclose Personal Data in response to lawful requests as part of a legal proceeding or by public authorities.

Your Personal Data may be transferred to countries where the local legislation provides a different level of protection, including the United States, for your Personal Data and rights. If that is the case, we will acquire your explicit consent where necessary for such international data transfers. We may also utilize Undertakings approved by the Board for data transfers which are not subject to your explicit consent.

Further information about our data transfers and the safeguards in place can be requested from the contact addresses listed above.

Data Retention

Within the Joint Scope, we keep your Personal Data as long as it is necessary for the purposes of processing your personal data and needed to guarantee our commitments related to Intuitive Technology and related services, and to maintain the professional relationship over time. We may keep your Personal Data longer if required by applicable law or where we have a legitimate and lawful purpose to do so. We will delete, destroy or anonymize your personal data in cases where the legal basis for processing your personal data has ceased to exist either by ourselves or upon your request.

Your Rights

As provided by the Data Protection Law, you may exercise the following rights:

- to find out whether your personal data is processed
- to request information regarding the processing of your personal data
- to find out the purpose of the processing of your personal data and whether your personal data is being used for the purpose
- to find out which third parties your personal data is being transferred to
- to request rectification of your incomplete or inaccurate data, if any
- to request the deletion or destruction of your personal data
- to find out operations carried out in response to your request for rectification, deletion or destruction of your personal data
- to object to the processing of personal data through automated means
- to claim compensation for the damages arising from unlawful processing of your personal data.

If data processing is based on your consent, you may withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of processing done before the withdrawal.

To exercise your rights, you may contact Distributor at kvkk@cordamed.com.tr or Intuitive's Data Protection Officer at data.privacy@intusurg.com or the Data Controller Representative of Intuitive within Türkiye (Firat Yalcin, with professional address at Pekin Pekin - 10 Lamartine Caddesi, Taksim 34437, Türkiye).

If you believe your Personal Data has been processed in violation of the Data Protection Law, you have the right to lodge a complaint with the Turkish Data Protection Authority, provided that you have contacted the Data Controller and your complaint was not resolved by the data controller.

Automated Decision Making

We do not use the Personal Data described herein for automated decision-making, including profiling, that produces legal effects or similarly significantly affects you.

No Requirement to Provide Data

You are not required to provide your Personal Data to us, except, for example when necessary to perform a contract. Some information may be provided by you, your employer or associated hospital under a contract with us. However, not providing some of the information may impact the ability to support your or your employer/hospital's use of certain product features or functionality, including the use of relevant training materials or metrics.

How We Protect Your Data

The security and confidentiality of your Personal Data is important to us. We store Personal Data with industry-standard information technology and cloud services, following industry standard practices to maintain confidentiality, integrity and availability.

Changes to This Notice

If anything changes, we will update this Notice and the Notice Effective Date.