

**YAPI KREDİ YATIRIM MENKUL DEĞERLER A.Ş.**

**CORPORATE POLICY ON PROTECTION AND  
PROCESSING OF  
PERSONAL DATA**

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## 1. INTRODUCTION

As is known, the European Union ("EU") has made arrangements regarding the protection of personal data and it has become an obligation for the member states to comply with these regulations and principles. In our country, within the framework of harmonization with the EU criteria, regulations regarding the protection of personal data is being made by the Turkish Grand National Assembly ("TBMM").

Yapı Kredi Yatırım Menkul Değerler A.Ş. with the responsibility of both being at the leading position in the capital markets of Turkey, and also being the affiliate of the first private bank incorporated in Turkey, shows utmost sensitivity to ensure full compliance with the Law No. 6698 on Protection of Personal Data ("**Law**") which is adopted on March 24, 2016 by TBMM and take effect upon being published on the Official Journal on April 7, 2016 and also with the other regulations for the enforcement of this law and acts taking into account the financial implications as well as impact of this issue on society.

## 2. PURPOSE AND SCOPE

Within the scope of the Law, protection of the fundamental rights and liberties of persons, especially the privacy of private life in the processing of personal data, and the liabilities of real and legal persons who process personal data and the procedures and principles they shall comply with are set forth.

The purpose of this Corporate Policy of Yapı Kredi Yatırım Menkul Değerler A.Ş. on Protection and Processing of Personal Data ("**Policy**") which is drawn up taking into account the said regulation, is assessing the matters regarding compliance with obligations with regards to the regulation on the protection of personal data, processing of the information provided within the scope of the Institution's activities and the protection of confidentiality, with a risk-based approach, and establishing the strategies, internal controls and measures, rules of conduct and responsibilities and raising the awareness of personal data subjects and employees of the corporation.

This Policy is used in our Institution and in the affiliates of our Institution, and also in its foreign branches and in their affiliates provided that the legislation in the countries in which it operates is compatible. Within the scope of this Policy, protection and processing of the personal data of our existing and potential customers that are subject to this Policy, the authorized persons and shareholders of our customers, real persons providing security, employee and intern candidates, our business partner candidates, employees, shareholders and authorized persons of our business partners, subcontractor/supplier/support service organization candidates, employees, shareholders and authorized persons of our subcontractors/suppliers/support service organizations, participants of campaigns/contests, our visitors, press members, family members and relatives of the data subjects and other third parties are covered.

The activities carried out by our Institution for the protection of the personal data of our employees are regulated under Corporate Policy of Yapı Kredi Yatırım Menkul Değerler A.Ş. on Protection and Processing of Personal Data of the Employees, which was drawn up in line with the principles of this Policy.

All the activities to be carried out within the Institution and the measures to be taken under this Policy are determined by the relevant procedures. It is the Legislation Compliance Department that is entitled and liable to draw up, amend in accordance with the terms and put into effect the said procedures. All the employees of the Institution are obliged to comply with this Policy and all related legislation when performing their duties.

In the event that this Policy is not complied with or is violated in any way, the Institution will impose necessary sanctions, and disciplinary punishments which may even include the termination of the employment contract depending on the nature of the incident, may be imposed.

## 3. DEFINITIONS

Unless the content of this Policy requires otherwise:

"Explicit Consent"	Means a consent relating to a certain subject which is based on information and taken at one's free will,
"Constitution"	Means the Constitution of the Republic of Turkey,
"Institution"	Means Yapı Kredi Yatırım Menkul Değerler A.Ş.
"Personal Data"	<i>Means any and all information relating to a known real person or a real person who can be identified (For example: name-surname, TR ID no, e-mail, address, date of birth, credit card number, bank account number - Therefore, the processing of information regarding legal entities is not covered by the Law)</i>
"Personal Data Subject"	Means the real person whose personal data is being processed,

**"Processing of Personal Data"** Means any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system,

**"Sensitive Personal Data"** Means any biometric or genetic data relating to racial or ethnic origin, political opinion, philosophical and religious beliefs, sect, or other beliefs, dressing, membership of an association, a foundation or a trade union, health, sexual life, the sentence of any punishment and security measures,

**"Data Controller"** Means the person who determines the purposes and means of processing personal data, and manages the place where the data is kept systematically

(data recording system).

#### **4. MATTERS REGARDING THE PROCESSING OF THE PERSONAL DATA**

##### **4.1. General Principles regarding the Processing of Personal Data**

Our Institution processes the data in line with all the legislative provisions that it is liable to comply with within the scope of its activities, and with the Constitution, the Law, Capital Market Law numbered 6362 in particular. The following principles are taken into consideration in this context:

###### **4.1.1. Compliance with the Law and Good Faith**

Our Institution, as a prudent merchant, acts in accordance with the principles set forth with legal regulations as well the law and good faith in the processing of personal data.

###### **4.1.2. Ensuring that Personal Data is Accurate and up-to-date when needed**

In addition to the provisions of other legislation which it is obliged to observe within scope of its activities, our Institution ensures that the personal data it processes in accordance with the Law by taking into consideration the fundamental rights of personal data subjects and its legitimate interests are accurate and up to date.

###### **4.1.3. Processing of data for Certain, Clear and Legitimate purposes**

Our Institution clearly determines its purposes of processing personal data that are legitimate and lawful in a certain fashion. In this scope, personal data are processed in limitation to products and/or services presented or to be presented by the Institution and its legal obligations. Purposes for processing personal data are set forth before processing of personal data has been started in this context.

###### **4.1.4. Relevance to purpose of processing, being limited and moderate**

Our Institution processes the personal data of its employees in a manner that enables to carry out the said purposes and avoids the processing of personal data that is not relevant or not required for the performance of the purpose. Accordingly, the processing of personal data is limited to activities and legal obligations.

###### **4.1.5. Storage of Data for a period stipulated by the Respective Legislation or required for the processing purpose**

Our Institution stores the personal data only for a period stipulated by the respective legislation that it is obliged to observe or required for the processing purpose.

##### **4.2. Conditions of Processing of Personal Data**

With the regulation set forth under Article 20 of the Constitution, the protection of personal data is secured as a fundamental human right and the details set forth to be regulated by law. In this direction, the protection of personal data is a constitutional right. Fundamental rights and liberties may only be restricted by law, without prejudice to their essence, and only based on the reasons set forth in the relevant articles of the Constitution. Our Institution processes the personal data by obtaining the explicit consent of the data holder in accordance with the Constitution and the Law or limited to the purposes

and conditions stated in the personal data processing terms which are specified in paragraph 2, Article 5 and paragraph 3, Article 6 of the Law.

Therefore, obtaining the explicit consent of the personal data subject is only one of the legal bases that make it possible for the personal data to be processed in accordance with the law. The basis of the personal data processing activity may be only as per one of the following conditions, and also more than one of these conditions may be the basis for the same personal data processing activity.

#### **4.2.1. Explicit Consent of the Personal Data Subject**

One of the requirements for the processing of personal data is the explicit consent of the data subject. The explicit consent of the personal data subject shall be related to a certain subject, subject to notification and stated with free will.

#### **4.2.2. Cases where Personal data can be processed without Explicit Consent**

##### 4.2.2.1. When it is clearly stipulated in laws

Data subject's personal data may be processed in accordance with law without explicit consent if it is expressly set forth in the law.

##### 4.2.2.2. When it is not possible to obtain the Express Consent of the Personal Data Subject due to actual impossibility

The personal data of the data subject may be processed if it is compulsory to process the personal data in order to protect the life or body integrity of the person who can not state his/her consent due to the actual impossibility or of another person or when it is not possible to validate the consent of an employee.

##### 4.2.2.3. When it is Directly Related to the Conclusion or Execution of the Contract

Personal data may be processed, to the extent personal data is directly related to the conclusion or execution of a contract, when it is required to process personal data pertaining to parties of the contract.

##### 4.2.2.4. When there is a Legal Obligation

If data processing is compulsory for our Institution to fulfill its legal liabilities, the data of the personal data subject may be processed.

##### 4.2.2.5. When the Data Subject has made her/his Personal Data public

If Data Subject has made his/her personal data public, then such personal data may be processed.

##### 4.2.2.6. When Data Processing is mandatory to Establish, Exercise or Protect a right

The personal data of the data subject may be processed when data processing is mandatory to establish, exercise or protect a right.

##### 4.2.2.7. When Data Processing is imperative for the Legitimate Interests of the Institution

Personal data of the data subject may be processed when it is mandatory to process data for legitimate interests of our Institution, provided that fundamental rights and liberties of the data subject are not prejudiced.

#### **4.2.3. Purposes of Personal Data Processing**

Data processing purposes of our Institution are described below:

- I. The planning and execution of the human resources policies and processes of the Bank,
- II. Ensuring the legal and technical security of our Bank and persons who have a business relationship with our Bank and the business continuity,
- III. Planning and conducting the activities necessary for the presentation and promotion of the products and services offered by the Institution to personal data subjects by customizing them according to the taste, usage habits and needs of the personal data subjects,
- IV. Having our units to carry out the procedures to cause the personal data subjects benefit from the products and services offered by our Institution, and the execution of related business processes,
- V. Execution of the necessary works by our respective business units and carrying out the related business processes for conducting the commercial and/or operational activities carried out by our Agency,

- VI. Planning and exercising of the commercial and/or business strategies of the Institution,
- VII. Planning and execution of the marketing activities carried out together with organizations which cooperate with the Institution/are affiliates of the Institution/renders brokerage services to the Bank

You may access further detailed information within the scope of the said purposes at this Policy's Annex 1: Purposes of Personal Data Processing.

#### **4.3. Processing of Sensitive Personal Data**

Our Institution acts in accordance with the regulations set forth in the Law in the processing of personal data specified to be "sensitive" by Law.

In this context, a number of personal data bearing the risk of causing victimization or discrimination of the individuals when they are processed illegally have been specified as "sensitive" in Article 6 of the Law. Sensitive personal data are processed by our Institution under the conditions specified below, in a manner in compliance with the Law and on condition that the adequate measures to be determined by the Personal Data Protection Board ("**PDP Board**") are taken:

- If there is explicit consent of the personal data subject,
- If there is no explicit consent of the personal data subject:
  - Sensitive personal data apart from those relating to health and sexual life of the Personal Data Subject may be processed in cases set forth in the Law,
  - Sensitive personal data relating to health and sexual life of the Personal Data Subject may only be processed by persons who is subject to confidentiality obligation or authorized agencies and administrations for purposes such as preserving public health, rendering services such as preventive medicine, medical diagnosis, treatment and care giving, planning and management of health services and financing of such services.

#### **4.4. Categorization of Personal Data**

The personal data are processed by informing the respective persons in accordance with Article 10 of the Law and in a limited manner based on one or more of the personal data processing requirements set out in Articles 5 and 6 of the Law and in the direction of our Institution's legal and legitimate personal data processing purposes, and on a data category basis, complying with all principles and obligations which are regulated under the Law including primarily the general principles on the processing of personal data.

Personal data subject categorizations within the scope of the implementation of this Policy and the explanations regarding such categorization are detailed below:

<b>"Family Members"</b>	Mean the family members and relatives of the personal data subjects.
<b>"Press"</b>	Means the real persons working in press institutions which our Bank cooperates with for all kinds of press and publication activities.
<b>"Employee Candidate"</b>	Means any person who has applied to our Institution for employment in any way or disclosed his/her resume and related information to the examination of our Institution.
<b>"Shareholder"</b>	Means the real persons who are the shareholders of the legal entity enterprises who are the customers of our Institution.
<b>"Business Partner Candidate"</b>	Means the real persons who work in a legal entity enterprise that our Institution intends to establish a cooperation, business partnership, program partnership or a co-brand.
<b>"Employee of a Business Partner"</b>	Means the real persons who work in a legal entity enterprise with which our Institution has a cooperation, business partnership, program partnership or a co-brand relationship.
<b>"Business Partner's Shareholder"</b>	Means the shareholders of the legal entity customers with which our Institution has a cooperation, business partnership, program partnership or a co-brand relationship.
<b>"Authorized Person of a Business Partner"</b>	Means persons who are legally authorized to represent the legal entities with which our Institution has a cooperation, business partnership, program partnership or a co-brand relationship.
<b>"Campaign/Contest Participant"</b>	Means the real persons participating in campaigns, draws, contests and similar activities which our Institution or other institutions for and on behalf of our Institution has organized/will organize.
<b>"Customer"</b>	Means the individuals who use or used the products and services offered by our

Institution, regardless of whether there is a contractual relationship with our Institution or not

<b>"Potential Customer"</b>	It refers to real persons who have requested to use our products and services or have been deemed to have such an interest as per custom of trade and good faith.
<b>"Intern Candidate"</b>	Means any person who has applied to our Institution for internship position in any way or disclosed his/her resume and related information to the examination of our Institution.
<b>"Authorized Person/Representative of a Company"</b>	Means the real persons who are the officers, directors, members of the board of directors and/or chairman of the board of directors in organizations which are the customers of our Institution, such as legal entities, public institutions, foundations, associations, apartment managements, etc.
<b>"Subcontractor/Supplier/Support Service Institution Candidate"</b>	Means the real persons who work in a legal entity enterprise with which our Institution intends to establish a subcontractor/supplier/support service relationship.
<b>"Employee of a Subcontractor/Supplier/Support Service Organization"</b>	Means real persons who work in a legal entity enterprise with which our Institution has a subcontractor/supplier/support service relationship.
<b>"Shareholder of a Subcontractor/Supplier/Support Service Organization"</b>	Means real persons who are the shareholders of legal entity customers with which our Institution has a subcontractor/supplier/support service relationship.
<b>"Authorized Person of a Subcontractor/Supplier/Support Service Organization"</b>	Means real persons who are legally authorized to represent the legal entity customers with which our Institution has a subcontractor/supplier/support service relationship.
<b>"Guarantors"</b>	Mean third party real persons with whom a relationship is established in order to ensure the commercial and legal transaction security between our Institution and its customers and/or for the credit debt security of the customers.
<b>"Visitor"</b>	Means real persons who have entered to the physical settlements owned by our Institution for various purposes or visited our websites.
<b>"3<sup>rd</sup> Person"</b>	Means the third party real persons that are not covered under the personal data categories set forth in the Corporate Policy of Yapı Kredi Yatırım Menkul Değerler A.Ş. on Protection and Processing of Personal Data of the Employees, who have relationships with the above mentioned persons in order to provide commercial and legal transaction security between those parties and to protect the rights of the persons and to provide benefits to those persons (for example third persons other than the customer that are parties to the payments transactions).

Data subjects whose personal data are processed by the Institution are covered within the above stated scope and the real person data subjects who are not covered within these categories may also submit their requests to the Institution as per the Law and such request shall also be taken into account under this Policy.

**In the direction of the foregoing remarks, personal data categories and explanations are detailed in the following table.**

CATEGORIZATION OF PERSONAL DATA	EXPLANATION REGARDING THE CATEGORIZATION OF PERSONAL DATA
<b>Information on Family Members and Relatives</b> :	Means the information about the family members and relatives of the personal data subject, for the purpose of protecting the legal interests of the data subject and the Institution and regarding the products and services we offer that is clearly belonging to a real person who is identified or identifiable and which is part of a data recording system.
<b>Employee/Intern Candidate Information</b> :	Means the personal data that are clearly belonging to a real person who is identified or identifiable, that are completely or partially processed automatically, or manually as part of a data recording system, and which are related to individuals who applied to become the employee/intern of our Bank and were assessed as the employee/intern candidate in line with the Human Resources requirements of our Institution as per commercial practices and good faith.
<b>Audit and Inspection Information</b> :	Means the personal data that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed

	automatically, or manually as part of a data recording system and that are processed within the scope of the legal liabilities of our Institution and compliance with the Institution's policies and audit.
<b>Financial information</b>	: Means the personal data that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system, and processed with regards to the information, documents and records that show any financial result created in accordance with the type of the legal relationship that our Institution has established with the personal data subject.
<b>Physical Environment Security Information</b>	: Means personal data regarding the records and documents obtained while entering to the physical environment and while staying within the physical environment, that are clearly belonging to a real person who is identified or identifiable, and part of a data recording system.
<b>Legal Transaction and Compliance Information</b>	: Means the personal data that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system and that are processed within the scope of the determination and monitoring of our legal receivables and rights and performance of our debts, and our legal liabilities and compliance with our Institution's policies.
<b>Contact Details</b>	: Means all information such as telephone number, address, e-mail and similar information that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system.
<b>Transaction Security Data</b>	: Means the personal data that are processed to ensure technical, administrative, legal and commercial security of the Institution and also of our employees while conducting business activities, which are clearly belonging to a real person who is identified or identifiable and which are included in the data recording system.
<b>Reputation Management Information</b>	: Means the information associated with the person and collected to protect the commercial reputation of our Institution (for instance: social media shares against our Institution, our senior management and shareholders), an information on the evaluation reports generated in this regard, and the actions taken.
<b>Identity Information</b>	: Means all information contained in documents such as driver's license, national identity card, certificate of residence, passport, attorney's identity, marriage certificate and similar documents that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system.
<b>Customer Details</b>	: Means the information that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system, and that are obtained and produced regarding the respective person as a result of our business activities and operations carried out by our business units in this scope.
<b>Customer Transaction Information</b>	: Means the information such as the records regarding the use of our products and services, and the instructions and requests of the customers required for the use of the products and services, that is clearly belonging to a real person who is identified or identifiable and which is part of the data recording system.
<b>Incident Management Information</b>	: Means the information and assessments relating to events that are associated with the personal data subject and are likely to affect our Institution, its employees and shareholders (e.g. reporting by the media of the commercial activities of our Institution carried out with a person who is tried as a defendant in a criminal case disclosed to public and in this direction, to conduct a research on this person and within the scope of the criminal investigation in order to prevent negative communication regarding our Institution, its shareholders and its senior management and the collected information on the proper management of the public in this respect).
<b>Sensitive Personal Data</b>	: Means all data that are specified in the Article 6 of the Law and clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system.
<b>Marketing Information</b>	: Means the personal data, which are processed for the marketing of our products and services by customizing them based on the usage habits, taste and needs of the personal data subject and reports and evaluations created as a result of these processes, that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or



	manually as part of a data recording system.
<b>Risk Management Information</b>	: Means the data such as the records of Findeks, Address Registration System and similar personal data that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system and that is processed to ensure our technical, administrative, legal and commercial security while conducting our business activities.
<b>Demand/Complaint Management Information</b>	: Means the personal data related to receiving and assessing any kind of demand and complaints directed to our Institution, that are clearly belonging to a real person who is identified or identifiable, and that are completely or partially processed automatically, or manually as part of a data recording system.

#### **4.5. Deletion, Destruction or Anonymization of Personal Data**

The personal data shall be deleted, destructed or anonymized upon the request of the relevant person or directly by our Institution, if the reasons for processing the same have ceased to exist although they have been processed in accordance with the Law and other relevant provisions of the legislation.

#### **4.6. Transfer of Personal Data**

In line with primarily the Constitution, provisions of the Law, the Capital Market Law and other relevant legislation, our Institution gives utmost care and attention to the sharing of personal data within the country and/or in foreign countries.

In this context, personal data and sensitive personal data are transferred by our Institution within the county or out of the country either on the basis of the explicit consent of the personal data subject or in accordance with the purposes and conditions stated in paragraph 2 of Article 5 of the Law and in paragraph 3 of Article 6 of the Law provided that the required precautions are taken.

In addition, our Institution, while transferring the personal data and sensitive personal data to abroad without the Personal Data subject's explicit consent, in addition to the conditions mentioned above, transfers the data to abroad provided that there is sufficient protection in the foreign country to which the personal data will be transferred and if such protection is not provided, then only if the data controllers in Turkey and the relevant foreign country commit to provide a sufficient protection in writing and if there is the permit of the PDP Board.

##### **4.6.1 Third Party to which Personal Data is Transferred and Transferring Purposes**

Your personal data can be transferred to the following party categories:

- (i) Legally Authorized Institutions,
- (ii) Our Business Partners,
- (iii) Our Suppliers,
- (iv) Our Shareholders,
- (v) Our Affiliates,

The scope of the above mentioned persons and the data transfer purposes are specified below:

<b>PERSONS TO RECEIVE THE TRANSFERRED DATA</b>	<b>DEFINITION</b>	<b>PURPOSE OF DATA TRANSFERRING</b>
<b>Legally Authorized Institutions</b>	This refers to the public/private institutions and organizations to which the Institution is authorized to transfer information and documents. CMB, CBRT, MASAK, TSPB (Turkish Capital Markets Association), CRA, Takasbank, Public Disclosure Platform, BIST, YTM (Investor Compensation Center), Revenue Administration, Undersecretariat of Treasury, SSI, judicial authorities and similar public/private institutes and	Transfer is carried out limited to the purposes requested by relevant public/private institutions and organizations within the scope of their legal authorization.

	institutions authorized by the law.	
<b>Business Partner</b>	Means the parties that the Institution has established for the purpose of carrying out the selling, promoting and marketing procedures of the Institution's products and services, providing after-sales support, and executing joint customer loyalty programs etc. while conducting its commercial activities, established in the country and/or abroad with which the bank is in cooperation, has business partnerships, program partnerships or co-brand or agency relationships. E.g. Findeks, Correspondent Banks, etc.	Transfers are carried out in a limited manner in order to ensure the fulfillment of the purpose of establishment of the business partnership.
<b>Supplier</b>	Means the parties and support service organizations that provide goods and/or services to the Institution on a contractual basis in accordance with the Institution's orders and instructions while the Institution is conducting its commercial activities.	Transfers are carried out in a limited manner to provide the Institution with the goods and/or services that the Institution is outsourcing from the supplier and to perform the commercial activities of the Institution and to receive support services.
<b>Shareholders</b>	Refer to the shareholders bearing the controlling shareholder title, established at home and/or abroad, which governs and controls the commercial activities and strategies of the Institution in accordance with the provisions of the applicable legislation.	Pursuant to the provisions of the related legislation, transfers are limited for the purpose of carrying out the commercial activities of the Institution.
<b>Affiliates/Parent Company</b>	Means companies, incorporated either at home and/or abroad, where the Institution directly and indirectly holds a stake and Yapı Kredi Bankası A.Ş., its parent company.	Transfers are carried out in a manner limited to ensuring that the business activities that also require the participation of affiliates and parent company of the Institution are performed.

#### **4.7. Disclosure Obligation**

It has been established in the Constitution that everyone has the right to be informed about the personal data about themselves. In this respect, in article 11 of the Law, among the rights of the personal data holder, "requesting for information" is also included. In this scope and as per Article 10 of the Law, in the course of obtaining personal data, our Institution shall notify the personal data subjects of the identity of our Institution, the purpose for which the personal data will be processed, the parties to which and for what purposes the personal data might be transferred, the method and legal reason for collecting personal data and on the rights they have in accordance with the Article 11 of the Law.

In addition, our Institution provides notification to respective persons and transparency in personal data processing activities by announcing to persons related to personal data subjects that it carries out data processing activities in accordance with the relevant legislation through various publicly open documents and especially this Policy.

### **5. SECURITY OF PERSONAL DATA**

Our Institution gives the utmost care and attention to the provision of data security and in this context, according to Article 12 of the Law, the required precautions are taken regarding the following issues regarding "data security".

- I. Institution:

- to prevent the processing of personal data unlawfully,
- to prevent access to personal data unlawfully,
- to ensure personal data protection

ensures that all necessary technical and administrative measures are taken in order to establish appropriate level of security in line with the above mentioned purposes.

- II. The Institution is jointly responsible with the respective persons with regards to taking the measures mentioned in the first article above, if the personal data is processed by another real or legal entity for and on behalf of the respective person.
- III. The Institution assures conducting of necessary audits by the Internal Audit/Internal Control units in order to ensure the implementation of the provisions of the Law.
- IV. Employees working within our Institution are informed and trained on the Law on Protection of Personal Data and Processing of Personal Data in Accordance with the Law.
- V. Persons who learn the personal information due to the employees and/or their duties in our Institution do not disclose such information to anyone else in breach of the provisions of the related Law and other relevant legislation and do not use the same except for the purpose of processing. This obligation survives the expiry of the employees' duty.
- VI. Provisions are added to the contracts and agreements concluded with the persons to whom the personal data are transferred in accordance with the Law by Our Institution in order to ensure that the persons to whom the personal data are transferred take the necessary security measures in order to protect the personal data and comply with these measures in their own organizations.
- VII. Our Institution takes technical and administrative precautions according to the technological facilities and cost of implementation in order to ensure that the personal data is stored in safe environments and prevent the same from being destructed, lost or changed by unlawful purposes.
- VIII. If the processed personal data is obtained by others through unlawful ways, the subject matter will be reported to the PDP Board and the respective person as soon as possible. Furthermore, if it is deemed necessary by the PDP Board, this situation will be declared on the website of the PDP Board or in such other way.

#### **6. PROTECTING RIGHTS OF THE DATA SUBJECT**

If personal data subjects submit their requests regarding the following rights to the Institution, the requests are concluded free of charge within thirty days at the earliest, depending on the nature of the request. However, in the instance which the procedure requires an additional expense, the fee indicated in the price list determined by the PDP Board or other authorities will be charged by our Institution.

In this context, the data subjects will be able to transmit their requests to our Institution in writing or in other ways as determined by the PDP Board.

Personal data subjects:

- to find out whether their personal data has been processed,
- to request information if their personal data has been processed,
- to find out the purpose for processing of their personal data and whether they have been used in accordance with this purpose,
- to be informed of the domestic or international third parties to which the personal data has been transferred,
- request for the correction of personal data if they are incomplete or incorrectly processed and ask that the process carried out in this context be notified to the third parties to whom personal data have been transmitted,
- Request for the deletion or destruction of personal data if the reasons for processing the same have ceased to exist although they have been processed in accordance with the Law and other relevant laws, and ask that the process carried out in this context be notified to the third parties to whom personal data have been transmitted,
- to object to any unfavorable result suffered due to analysis of processed data exclusively by means of automatic systems and
- to demand indemnification of losses suffered due to personal data being processed

in breach of the law.

## ANNEX -1: Purposes of Personal Data Processing

MAIN OBJECTIVES (PRIMARY)	SUB-OBJECTIVES (SECONDARY)
1. The planning and execution of the human resources policies and processes of the Bank,	Fulfillment of the obligations arising from the employment contract and/or legislation for the employees of the Institution's employees/former employees Planning and/or conducting in-house training activities Internal/external communication activities required for placement of employee candidate and/or student and/or internet Planning and/or execution of application, selection and evaluation processes of candidate employees, Planning and/or execution of employee/employee candidate satisfaction and/or commitment processes Planning and/or execution of fringe benefits and/or interests for employees Planning and/or execution of activities for employees such as corporate communication and/or corporate social responsibility and/or non-governmental organizations to which employees participate Planning and/or execution of exit procedures of employees Monitoring and/or controlling the business activities of the employees Planning and/or execution of the processes of obtaining and assessing the recommendations of the employees for improving the business processes Planning and/or execution of employees' recruitment and/or personalization processes Planning and/or execution of the performance evaluation processes of the employees Planning and/or enforcement of employees' salaries Planning and/or execution of the human resources processes Planning and/or execution of the activities that are required to be performed within the framework of occupational health and/or safety Enforcement of Personnel Recruitment Processes Planning and/or execution of reference and/or intelligence activities for personnel recruitment and/or granting reference for former employees, Planning and/or Execution of Processes for Intern and/or Student Recruitment, Placement Planning and execution of Appointment-Promotion and Dismissal processes, Planning and/or conducting in-house orientation activities Wage management Planning and/or conducting skill/career development activities
2. Assuring the legal and technical security of our Institution and persons who have a business relationship with our Institution as well as the business continuity	Planning and/or execution of emergency and/or incident management processes Planning and/or execution of relations with the main shareholders Assuring the security of the fixtures and/or resources of the Institution Ensuring that activities of the Institution are carried out in accordance with the Institution's procedures and/or respective legislation Assuring the security of the Institution's system and operations Assuring security of the Institution's campuses and/or premises Planning and/or execution of audit and/or ethical activities of the Institution Planning and/or execution of the Financial Risk processes of the

	Institution
	Planning and/or execution of necessary operational activities regarding unethical conduct and/or abuse of employees
	Follow-up of the legal affairs
	Managing and/or controlling the relationships with Affiliates and/or Parent Company
	Planning/execution, directly or upon complaint, of internal audit/internal control/investigation/intelligence activities
	Planning or execution of risk management processes related to products or services so offered
	Realization of risks, audits and operational activities carried out in cooperation with affiliates and/or the Parent Company within the framework specified in the Capital Market Law
	Planning and/or execution of Operational Risk Processes
	Taking actions connected with the law on companies and partnership
	Ensuring that the data are accurate and up-to-date
	Execution of compliance processes as required by foreign legislation
	Providing information to authorized persons and/or agencies as a requirement of the legislation
	Creation and/or follow-up of visitor records
3. Planning and conducting the activities necessary for the presentation and promotion of the products and services offered by the Institution to personal data subjects by customizing them according to the taste, usage habits and needs of the personal data subjects,	The planning or execution of processes aimed at creating or increasing loyalty to the products and services offered by our Institution
	Designing and/or execution of advertising and/or promotional and/or marketing activities in digital and/or other media
	Planning and/or execution of campaign or promotion processes
	Designing and/or conducting customized marketing and/or promotional activities
	Planning and/or conducting of activities aimed at customer satisfaction and experience
	Conducting of data analytics activities for marketing purposes
	Planning and/or execution of market research activities
	Planning/execution of marketing processes related to products or services
4. Having our units to carry out the procedures to cause the personal data subjects benefit from the products and services offered by our Institution, and the execution of related business processes,	Planning and/or execution of sales activities of the products and/or services offered by the affiliates and/or Parent Company of our Institution to the extent permitted by the legislation
	Planning and/or execution of activities for cross-selling related to products offered by the Institution
	Establishment and/or execution of the credit application period
	Establishment and/or execution of the credit evaluation and/or allocation process
	Establishment and/or execution of the credit disbursement process
	Follow-up of credit equity ratio
	Planning and/or execution of customer relations management processes
	Finalization/follow-up of customer requests or complaints
	Planning and/or execution of the activities regarding after-sales support services
	Follow-up of contractual procedures and/or legal demands
	Planning and/or conducting the processes of providing the customer

	with tools and/or information suitable for the channels it will use and/or access to the products and/or services
	Conducting activation processes for products and/or services
	Establishment and/or follow-up of application procedures for products and/or services
	Establishment and/or follow-up of utilization procedures of the products and/or services
	Planning and/or performance of the sales processes of the products and/or services
	Establishment and/or follow-up of the allocation and/or evaluation processes of the products and/or services
	Planning, auditing and/or conducting of information security processes
5. Conducting of necessary affairs by our respective business units and carrying out the related business processes for conducting the commercial and/or operational activities carried out by our Institution,	Establishment and/or management of the information technologies infrastructure
	Planning and execution of an employee's authority to access the information
	Follow-up of finance and/or accounting affairs
	Planning and/or execution of activities relating to printed and/or visual or audio communication to be shared with internal and/or external stakeholder
	Planning or execution of the activities regarding the efficiency/productivity or appropriateness analysis of business activities
	Planning and/or execution of business activities
	Planning and/or exercising of the information access rights of business partners and/or suppliers
	Planning and/or conducting of activities regarding the provision of business continuity
	Planning or conducting of corporate communication activities
	Planning and/or conducting of corporate management activities
	Planning and/or execution of logistic activities
	Planning and/or execution of operation and/or productivity processes
	Planning and/or execution of procurement processes
	Planning and/or execution of social responsibility and/or civil society activities
	Planning and/or execution of sponsorship activities
	Planning and/or execution of Supply Chain management processes
	Planning and/or monitoring of building and/or construction works
	Planning and/or execution of the investment processes
	Planning and/or conducting of the projects in line with the objectives of the Institution
6. Planning and/or exercising of the commercial and/or business strategies of the Institution	Carrying out and/or exercising budget studies
	Management of the relationships with business partners and/or suppliers
	Conducting strategic planning activities
	Planning and execution of the processes related to products and services offered by and/or in cooperation with organizations with which the Institution cooperates/are affiliates and/or the Parent Company of the Institution/for which the Institution renders

	brokerage services
7. Planning and execution of the marketing activities carried out together with organizations which cooperate with the Institution/are affiliates and/or the Parent Company of the Institution/for which the Institution renders brokerage services	Planning and conducting the activities aimed at promoting and increasing the use of products and services offered jointly
	Designing and execution of the products and services that are to be offered jointly to increase customer/employee satisfaction and commitment
	Planning and execution of the marketing activities for products and services of organizations with which the Institution cooperates/are affiliates and/or the Parent Company of the Institution/for which the Institution renders brokerage services