

YAPI VE KREDİ BANKASI A.Ş.

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

2018 MAY

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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 ve Kredi Bankası A.Ş., with the responsibility of both being at the leading position in the banking sector of Turkey, and also being the first private bank established 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 ve Kredi Bankası 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 Bank'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 owners and employees of the corporation.

This Policy is used in the Bank and in the Subsidiaries of the Bank, and also in the foreign branches of the Bank and in their Subsidiaries 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, 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 owners and other third parties are covered.

The activities carried out by The Bank for the protection of the personal data of our employees are regulated under Corporate Policy of Yapı ve Kredi Bankası 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 Bank and the measures to be taken under this Policy are determined by the relevant procedures. The department to be authorized by the Directorate-General of the Bank shall be responsible and entitled to draw up, amend in accordance with the terms and put into effect the respective procedures. All the employees of the Bank 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 anyway, the Bank 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"	The Constitution of the Republic of Turkey,
"Bank"	Yapı ve Kredi Bankası A.Ş.
"Personal Data"	Means any kind of information relating to an identified or identifiable natural person (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),

"Personal Data Owner"	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

The Bank processes the data in line with all the legislative provisions that it is liable to comply with within the scope of its activities, and in particular with the Banking Law no 5411, Constitution and the Law. The following principles are taken into consideration in this context:

4.1.1. Processing in compliance with the Law and Good Faith

The Bank, as a prudent merchant, acts in accordance with the principles set forth with legal regulations and the principle of general trust 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 regarding its activities, the Bank ensures that the personal data it processes in accordance with the Law by taking into consideration the fundamental rights and legitimate interests of its personal data owners are accurate and up to date.

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

The Bank explicitly and precisely defines the legitimate and lawful purpose of processing personal data. In this scope, the personal data is processed to the extent limited by products and/or services provided or to be provided and legal obligations. In this context, for what purposes the personal data will be processed must be revealed prior to the personal data processing.

4.1.4. Being Connected with Purpose of Processing, Being Limited and Moderate

The Bank processes personal data in such a sufficient way to achieve the specified purposes and avoids the processing of personal data which is not relevant or required for achieving the purposes. In this regard, processing of personal data shall be limited to the activities and legal obligations.

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

The Bank retains the personal data only for the length of time stipulated by the relevant legislation that it is obliged to obey or required for the purposes of processing.

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. The Bank processes the personal data by obtaining the explicit consent of the data holder in accordance with the Constitution and Law or limited to the purposes and conditions stated in the personal data processing terms which are specified in the 2nd paragraph of Article 5 and the 3rd paragraph of Article 6 of the Law.

Therefore, obtaining the explicit consent of the owner of the personal data 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 Owner

One of the requirements for the processing of personal data is the explicit consent of the owner. The explicit consent of the personal data owner 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

Personal data of the personal data owner 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 Owner due to actual impossibility

The personal data of the data owner may be processed if it is compulsory to process the personal data in order to protect the life or body integrity of the personal data owner 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 personal data owner

4.2.2.3. When it is Directly Related to the Establishment 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. Legal Obligation

If data processing is compulsory for The Bank to fulfill its legal liabilities, personal data of the personal data owner may be processed.

4.2.2.5. When the Data Owner has made their Personal Data public

If the personal data owner 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

Personal data of the personal data owner 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 Bank

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

4.2.3. Purposes of Personal Data Processing

Data processing purposes of the Bank are described below:

- I. 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 Bank to personal data owners by customizing them according to the taste, usage habits and needs of the personal data owners,
- IV. Having our units to carry out the procedures to cause the personal data owners benefit from the products and services offered by our Bank, 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 Bank,
- VI. Planning and exercising of The Bank's commercial and/or business strategies,
- VII. Planning and execution of the marketing activities carried out together with organizations which cooperate with the Bank/are affiliates of the Bank/renders brokerage services to the Bank and which are agencies of the Bank.

You may access further detailed information within the scope of the said purposes from ANNEX -1: Purposes of Personal Data Processing of this Policy.

4.3. Processing of Sensitive Personal Data

The Bank 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 personal data owner when they are processed illegally have been specified as "sensitive" in the 6th Article of the Law. Sensitive personal data are processed by The Bank 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 owner,
- If there is no explicit consent of the personal data owner:
 - Sensitive personal data apart from those relating to health and sexual life of the Personal Data Owner may be processed in cases set forth in the Law,
 - Sensitive personal data relating to health and sexual life of the Personal Data Owner 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 of the personal data owner is 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 The Bank'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 owner categorizations within the scope of the implementation of this Policy and the explanations regarding such categorization are detailed below:

"Family Members"	Refers to the family members and relatives of the Personal Data owners.
"Press"	It refers to the real persons working in press institutions which The Bank cooperates with for all kinds of press and publication activities.
"Employee Candidate"	Means any person who has applied to The Bank for employment in any way or disclosed his/her resume and related information to the examination of The Bank.
"Shareholder"	Refers to the real persons who are the shareholders of the legal entity enterprises who are the customers of The Bank.
"Business Partner Candidate"	Refers to the real persons who work in a legal entity enterprise that The Bank intends to establish a cooperation, business partnership, program partnership or a co-brand.
"Employee of a Business Partner"	Refers to the real persons who work in a legal entity enterprise that The Bank has a

cooperation, business partnership, program partnership or a co-brand relationship with.

"Business Partner Shareholder"	Refers to the shareholders of the legal entity customers that The Bank has a cooperation, business partnership, program partnership or a co-brand relationship with.
"Authorized Person of a Business Partner"	Refers to the persons who are legally authorized to represent the legal entities that The Bank has a cooperation, business partnership, program partnership or a co-brand relationship with.
"Campaign/Contest Participant"	Means the real persons participating in campaigns, draws, contests and similar activities which The Bank or other institutions for and on behalf of The Bank has organized/will organize.
"Customer"	Means the individuals who uses or used the products and services offered by The Bank, regardless of whether there is a contractual relationship with The Bank or not
"Potential Customer"	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.
"Intern Candidate"	Means any person who has applied to The Bank for internship in any way or disclosed his/her resume and related information to the examination of The Bank.
"Authorized Person/Representative of a Company"	It refers to 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 The Bank, such as legal entities, public institutions, foundations, associations, apartment managements etc.
"Subcontractor/Supplier/Support Service Organization Candidate"	Refers to the real persons who work in a legal entity enterprise that The Bank intends to establish a subcontractor/supplier/support service relationship with.
"Employee of a Subcontractor/Supplier/Support Service Organization"	Refers to the real persons who work in a legal entity enterprise that The Bank has a subcontractor/supplier/support service relationship with.
"Shareholder of a Subcontractor/Supplier/Support Service Organization"	Refers to the real persons who are the shareholders of legal entity customers that The Bank has a subcontractor/supplier/support service relationship with.
"Authorized Person of a Subcontractor/Supplier/Support Service Organization"	Refers to the real persons who are legally authorized to represent the legal entity customers that The Bank has a subcontractor/supplier/support service relationship with.
"Guarantors"	Refer to the third party real persons with whom a relationship is established in order to ensure the commercial and legal transaction security between The Bank and its customers and/or for the credit debt security of the customers.
"Visitors"	Refer to real persons who have entered to the physical settlements owned by The Bank for various purposes or visited our websites.
"3rd Person"	Refers to the third party real persons that are not covered under the personal data categories set forth in the Corporate Policy of Yapı ve Kredi Bankası 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 owners whose personal data are processed by the Bank are covered within the above stated scope and the real person data owners who are not covered within these categories may also submit their requests to the Bank as per the Law and such requests 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
Information on Family Members and Relatives :	It refers to the information about the family members and relatives of the Personal Data owner, for the purpose of protecting the legal interests of the Personal Data owner and the Bank 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.
Employee/Intern Candidate Information :	It refers to 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 The Bank for employment or assessed as an employee /intern candidate in line with the human resources needs of The Bank as per custom of trade and good faith.
Audit and Inspection Information :	It refers to 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 The Bank and compliance with the Bank policies and audit.
Financial Information :	It refers to 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 The Bank has established with the personal data owner..
Physical Environment Security Information :	It 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.
Legal Transaction and Compliance Information :	It refers to 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 the Bank policies.
Contact Details :	It 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.
Transaction Security Data :	It refers to the personal data that are processed to ensure technical, administrative, legal and commercial security of the Bank 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.
Reputation Management Information :	It refers to the information associated with the person and collected to protect the commercial reputation of the Bank (for instance: social media shares against The Bank, our senior management and shareholders), an information on the evaluation reports generated in this regard, and the actions taken.
Identity Information :	It 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.
Location Data	:	It means all the information identifying the location of the place where our customers or the employees of the institutions which we are cooperating/have a business relationship with use the tools and/or devices of The Bank, and 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.
Customer Details	:	It 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.
Customer Information	Transaction :	It refers to 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.
Incident Information	Management :	It means the information and assessments relating to events that are associated with the personal data owner and are likely to affect The Bank, its employees and shareholders (for example: reporting by the media of the commercial activities of The Bank 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 The Bank, its shareholders and its senior management and the collected information on the proper management of the public in this respect).
Sensitive Personal Data	:	It 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.
Marketing Information	:	It 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 owner 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.
Risk Information	:	It refers to data such as the records of Credit Reference Agency, 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.
Demand/Complaint Information	:	It refers to the personal data related to receiving and assessing any kind of demand and complaints directed to The Bank, 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, destroyed or anonymized upon the request of the personal data owner or ex officio by The Bank, 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 and also the provisions of the Law, the Banking Law and other relevant legislation, The Bank 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 within the country or out of the country either on the basis of the explicit consent of the personal data owner or in accordance with the purposes and conditions stated in paragraph 2 of Article 5 of the Law and/or in paragraph 3 of Article 6 of the Law provided that the required precautions are taken.

In addition, The Bank, while transferring the personal data and sensitive personal data to abroad without the Personal Data owner'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 Subsidiaries,

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

PERSONS TO RECEIVE THE TRANSFERRED DATA	DEFINITION	DATA TRANSFERRING PURPOSE
Legally Authorized Institutions	This refers to the public/private institutions and organizations authorized to receive the transferred information and documents by the Bank. Banking Regulation and Supervision Agency, Capital Markets Board of Turkey, Central Bank of Republic of Turkey, Financial Crimes Investigation Board, Banks Associate of Turkey, KOSGEB, Revenue Administration, Undersecretariat of Treasury, Social Security Institution, juridical authorities and such legally authorized public/private institutions and organizations.	Transfer is carried out limited to the purposes requested by relevant public/private institutions and organizations within the scope of their legal authorization.
Business Partner	Means the parties that the Bank has established for the purpose of carrying out the selling, promoting and marketing procedures of the Bank's products and services, providing after-sales support, and executing joint customer loyalty programs etc. while conducting its commercial activities, established in the	Transfers are carried out in a limited manner in order to ensure the fulfillment of the purpose of establishment of the business partnership.

	country and/or abroad with which the bank is in cooperation, has business partnerships, program partnerships or co-brand or agency relationships. Credit Registration Agency (KKB), corresponding bank, etc.	
Supplier	Means the parties and support service organizations that provide goods and/or services to the Bank on a contractual basis in accordance with the Bank's orders and instructions while the Bank is conducting its commercial activities.	Transfers are carried out in a limited manner to provide the Bank with the goods and/or services that the Bank is outsourcing from the supplier and to perform the commercial activities of the Bank and to receive support services.
Shareholders	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 Bank 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 Bank.
Subsidiaries	Refers to companies in which the Bank is directly and indirectly a shareholder, and which are established domestically and/or in abroad.	Transfers are carried out in a limited manner, just to ensure that the business activities that require the participation of its Subsidiaries as well 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 the 11th article 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, The Bank shall notify the personal data owners of the identity of the Bank, 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, The Bank provides notification to respective persons and transparency in personal data processing activities by announcing to personal data owners and related persons 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

The Bank 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. The Bank:

- 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 inline with the above mentioned purposes.

- ##### **II. The Bank 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 Bank ensures the 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 The Bank 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 The Bank 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 The Bank 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. The Bank 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. PROTECTION OF PERSONAL DATA OWNER'S RIGHTS

If the Personal Data Owner submit their requests regarding the following rights to the Bank, 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 the Bank.

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

Personal Data Owner have the following rights:

- 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 results 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. Planning and execution of the human resources policies and processes of the Bank	Fulfillment of the obligations arising from the work flow and/or legislation for the former employees/employees of the Bank

	Planning and/or conducting in-house and external training activities
	Internal / external communication activities necessary for recruitment of employee candidate and/ or student and / or intern
	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 conducting employee wages
	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
	Execution of Personnel Recruitment Processes
	Planning and/or conducting processes of reference and/or intelligence activities for personnel recruitment and providing reference for former employees.
	Planning and/or conducting recruitment, placement and operation processes of interns and/or students.
	Planning and/or execution of staff appointment/promotion/quitting processes
	Planning and/or conducting in-house orientation activities
	Wage management
	Planning and/or conducting skill/career development activities
2. Ensuring the legal and technical security of our Bank and persons who have a business relationship with our Bank and the business continuity	Planning and/or execution of emergency and/or incident management processes
	Planning and/or execution of activities carried out with the main shareholder.
	Ensuring the security of the fixtures and/or resources of the Bank
	Ensuring the Bank's operations in accordance with the Bank's procedures and/or respective legislation
	Ensuring the security of the Bank system and operations
	Ensuring the safety of bank settlements and/or facilities
	Planning and/or execution of audit and/or ethical activities of the Bank
	Planning and/or execution of the Financial Risk processes of the Bank
	Planning and/or execution of necessary operational activities regarding unethical conduct and/or a abuse of employees
	Follow-up of the legal affairs
	Managing and/or controlling the relationships with Subsidiaries
	Planning and/or execution of internal audit / internal control / investigation / ethics activities upon complaint or ex officio
	Planning/execution of risk management processes related to the offered products and/or services

	Execution of risk, audit and operational activities along with subsidiaries in accordance with Banking Law
	Planning and/or execution of operational risk processes
	Carrying out the transactions of company and corporations law and legislation
	Ensuring that the data is accurate and up-to-date
	Execution of compliance process resulting from foreign legislation
	Providing information to authorized persons and/or organizations from the legislation
	Formation and/or follow-up of visitor registrations
3. Planning and conducting the activities necessary for the presentation and promotion of the products and services offered by the Bank to personal data owners by customizing them according to the taste, usage habits and needs of the personal data owners	Planning and execution of the process of establishing or increasing loyalty to the products or services offered by our bank
	Designing and/or conducting marketing and advertising/promotional activities in digital and/or other media
	Planning and/or conducting campaigns or promotional processes
	Designing and/or conducting customized marketing and/or promotional activities
	Planning and/or conducting of activities towards customer satisfaction and experience
	Conducting of data analytics activities for marketing purposes
	Planning and/or conducting of market research activities
	Planning/conducting the marketing processes of the products or services
4. Having our units to carry out the procedures to cause the personal data owners benefit from the products and services offered by our Bank, and the execution of related business processes	Planning and/or execution of sales activities of the products and/or services offered by the subsidiaries of our Bank to the extent permitted by the legislation
	Planning and/or execution of cross-selling activities for products offered by the Bank
	Establishment and/or execution of the credit application process
	Establishment and/or execution of the credit evaluation and underwriting process
	Establishment and/or execution of the credit granting process
	Loan monitoring (follow-up of credit payment)
	Planning and/or execution of customer relations management processes
	Finalizing and follow-up of customer demands or complaints
	Execution or follow-up of the insurance process of customers
	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 of products and/or services
	Establishment and/or follow-up of application processes of products and/or services
	Establishment and/or follow-up of utilization procedures of the products and/or services
	Planning and/or execution 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

5. 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 Bank	Planning, auditing and/or conducting of information security processes
	Establishment and/or management of the information technologies infrastructure
	Planning and/or execution of staff's authority to access to information
	Follow-up of finance and/or accounting procedures
	Planning and execution of printed or visual or audio communication activities to be shared with internal or external shareholders
	Planning or execution of the activities regarding the efficiency/productivity or appropriateness analysis of business activities
	Planning and/or conducting business activities
	Planning and/or exercise 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 conducting 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 conducting sponsorship activities
	Planning and/or execution of Supply Chain management processes
	Planning and/or follow-up of building and/or construction activities
Planning and/or execution of investment processes	
6. Planning and exercising of The Bank's commercial and/or business strategies	Planning and/or conducting of the projects in line with the objectives of the Bank
	Carrying out and/or exercising budget studies
	Management of the relationships with business partners and/or suppliers
	Conducting strategic planning activities
7. Planning and execution of the marketing activities carried out together with organizations which cooperate with the Bank/are affiliates of the Bank/renders brokerage services to the Bank and which are agencies of the Bank.	Planning and carrying out of the processes regarding the products and services offered together with organizations which cooperate with the Bank/are affiliates of the Bank/renders brokerage services to the Bank and which are agencies of the Bank
	Planning and conducting the activities aimed at promoting and increasing the use of products and services offered by the by our Bank
	Designing and execution of the products and services to increase customer/employee satisfaction and commitment
	Planning and carrying out of the marketing activities of the products and services offered together with organizations which cooperate with the Bank/are affiliates of the Bank/renders brokerage services to the Bank and which are agencies of the Bank