



# TEB

## DATA PROTECTION NOTICE ON PROCESSING OF CUSTOMER PERSONAL DATA

Data protection notices on processing of personal data within the scope of customer acquisition and account opening/usage, credit processes, investment activities and insurance activities by Türk Ekonomi Bankası A.Ş. as the data controller are listed below.

You can obtain detailed information about the processing of your personal data by accessing the related data protection notices regarding the products or services of our Bank that you are interested in through the list below.

- Data Protection Notice On Processing Of Personal Data For Customer Acquisition And Account Opening/Usage 2
- Data Protection Notice On Processing Customers Personal Data For Credit Processes 12
- Data Protection Notice On Processing Of Customer Personal Data For Investment Activities 22
- Data Protection Notice On Processing Of Customer Personal Data For Insurance Activities 32

## DATA PROTECTION NOTICE ON PROCESSING OF PERSONAL DATA FOR CUSTOMER ACQUISITION AND ACCOUNT OPENING/USAGE

### 1. Purpose and Scope

We, Türk Ekonomi Bankası A.Ş. ("TEB"), are acting as data controller for data processing activities subject to this Data Protection Notice on Processing of Personal Data for Customer Acquisition and Account Opening/Usage ("Data Protection Notice") as per the Law on Personal Data Protection numbered 6698 and the relevant regulations ("Data Protection Regulation"). As having responsibilities as a bank, we do exercise outmost care and diligence for the lawful processing of your personal data in line with the principles of the Data Protection Regulation and other regulations, to preserve its confidentiality and security.

This Data Protection Notice has been prepared in order to inform you by TEB on collection methods, legal reasons for personal data processing and purpose thereof, persons/institutions to whom personal data are been transferred and purpose of transfer and your rights as data subject as per Data Protection Regulation.

You may find relevant information from the below table regarding our bank processing your personal data.

Trade Name:	Türk Ekonomi Bankası A.Ş.
Address:	İnkılap Mahallesi, Sokullu Caddesi, No: 7A Ümraniye/İSTANBUL
Mersis Number:	0876004342000105
Trade Registry Number:	189356
Communication channels:	Communication Channels under <a href="https://www.teb.com.tr/contact-us/">https://www.teb.com.tr/contact-us/</a>

You might access the data protection notice on the main activities of our bank from <https://www.teb.com.tr/pdp>

## 2. Categories of Processed Personal Data

Personal data categories processed by TEB as data controller and examples of the personal data belonging to these categories are listed in the below table.

Categories of Processed Personal Data	Examples of Personal Data
Identity Data	Name surname, names of the mother-father, date of birth, birthplace, data in the identity documents, ID number/passport number/tax number
Contact Data	Home/work address, address number, e-mail, telephone number
Data on Family and Relatives	Civil status, information on family and relatives such as number of children
Data on Education, Work and Professional Life	Profession, work experience, current work, education
Economic and Financial Data	Information on income and assets, credit records, information on tax payments, data on financial products and services
Customers' Financial Transaction Data	Transactions and details relating to financial products and services, credit card usage information, bank card usage information, credit/deposit/FX account transactions, information on check/ bonds, bank receipt information, payment instructions
Card Payment Data	Credit card/bank card number, expiry date, security code
Digital Activity Data	Data collected by the usage of cookies and similar track methods such as IP address, information on the device
Data on Transaction Security and Cyber Security of the Institution	Username, password, audit trail record, log records, alerts on the prevention of fraud, other data on the security of the bank's cyber space
Data on Risk Management and Financial Security	Know your customer, information that might be used for the prevention of terrorism, prevention of fraud and risk management (work/field of activity, source of income, credit risk score, credit and risk information)
Audio and Visual Records	Call Centre/telephone records, video chat records, photo and video records
Reference Identifiers	Reference information allowing the Bank/Institution to identify the customer (customer number, product application number, transaction number, agreement number)
Data on Request / Complaint and Reputation Management	Request and complaints made through various channels, responses of the Bank to the requests and complaints, information used by the bank for reputation management
Legal Transaction Data	Information on Litigation, legal follow-up and mediation cases, demands submitted from legal authorities and Responses of the Bank/Institution to such requests.

Data on Facilities Physical Security	Entry - exit information of the visitors, camera records
Location Data	Location Data of the data subject
Marketing Data	Financial product and service usage habits, previous shopping and financial transaction information, areas of interest and preferences that might be relevant for financial product and service offers, survey results conducted for marketing purposes, information on campaign participation and preferences
Processed Special Category of Personal Data	Examples of Special Category of Personal Data
Data on Criminal Convictions and Security Measures	Information on criminal record and conviction, protection measures

The special category of personal data declared to be processed as per the above table is subject to a strict protection regime due to its sensitive nature and classified as special category of personal data. As TEB we make our best effort not to process your special categories of personal data during the data processing unless it is required and necessary. In this regard, only Criminal Convictions and Security Measures data which is one of the special categories of personal data might be processed in case you are involved in the relevant processes. The management of financial security processes (money laundering of the crime revenues, terrorism financing, corruption, bribery, prevention of fraud) might be given as an example of the activities where criminal convictions and security measure data might be processed.

### 3. Personal Data Collection Methods

Your personal data might be collected directly from you, or third parties as explained in below with automatic or non-automatic methods.

#### (i) Methods of Collecting the Personal Data Directly From You

- Information or documents containing your personal data might be collected through oral or written conversations made face to face with the TEB head quarter, branch, direct and active sale teams or through electronic communication tools (telephone/call centre, SMS, fax, e-mail, video call etc.) or with non-automatic methods using post, cargo, or courier services.
- Information or documents containing your personal data might be collected automatically from mobile banking channels, website of our bank, ATMs, kiosk, turbo devices, self-service units with assistance support, call centre and branch IVR system, SMA, CCTV.

#### (ii) Methods of Collecting the Personal Data From Third Parties

- Information or documents containing your personal data might be collected by non-automatic means using physical or electronic channels from business partner distributors or sale offices, e-commerce websites, association, institution or private persons such as chamber of commerce, chamber of artisans, trade associations, judicial authorities and public and private institutions authorised by law such as Banking Regulation and Supervision Agency, representatives such as power of attorneys, guardian, custodians to the extent permitted by law and the executed agreements.
- Information or documents containing your personal data might be automatically collected from the authorised public and private institutions database (Identity Sharing System, Address Sharing System, Central Population Administration System, Central Registration System, Land Registry and Cadastre Information System, Risk Centre of the Bank's Association of Turkey, Trade Registry Offices, Turkish Revenue Administration, Interbank Card Centre, Ministry of Treasury and Finance, General Directorate of Highways and person and institutions issuing invoices, to whom you have contact for your payments and collections etc.) provided that there is a system integration and to the extent permitted by law and the executed agreements.

#### 4. Purposes of Processing Personal Data and Legal Reasons

Your personal data processed by TEB and categorised in the list above might be processed for the purposes and legal reasons stated in the below table.

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Digital Activity Data Audio and Visual Records Legal Transaction Data Data on Transaction Security and Cyber Security of the Institution Card Payment Data Reference Identifiers Customers' Financial Transaction Data Data on Request/Complaint and Reputation Management Data on Family and Relatives Data on Education, Work and Professional Life Data on Risk Management and Financial Security	Informing authorised public and private institutions as per the applicable laws and regulations	Data processing is explicitly provided for by the law (Article 5.2 (a) of the Data Protection Law)
	Ensuring the physical security of the Bank / Institution	
	Setting up the required actions to conduct lawfully the Bank's / Institution's activities	
	Relationship management of support service providers, business partners or suppliers	
	Conducting processes related to payment services	
	Ensuring accuracy and up to dateness of the data	
	Conducting accountancy and invoice transactions	
	Conducting audit activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Customers' Financial Transaction Data Economic and Financial Data Data on Risk Management and Financial Security Data on Request / Complaint and Reputation Management Location Data Digital Activity Data Reference Identifiers Audio and Visual Records Data on Family and Relatives Data on Education, Work and Professional Life Data on Transaction Security and Cyber Security of the Institution Card Payment Data Legal Transaction Data	Conducting the sales process of the Bank's/Institution's services	Data processing is required for the establishment and performance of the contract between you and TEB (Article 5.2 (c) of the Data Protection Law)
	Conducting customer services	
	Conducting POS processes	
	Conducting payment service processes	
	Conducting ID verification processes	
	Analysing suitability of business processes and their productivity	
	Managing customer relations	
	Managing customer complains	
	Designing the Bank's /Institution's business processes	
	Relationship management of support service providers, business partners or suppliers	
	Follow-up agreement processes	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Management of IT security	
	Ensuring the accessibility of the Bank's / Institution's services	
	Conducting litigation and legal follow-up processes	
	Conducting accountancy and invoice transactions	

Versiyon No V1.2024.08.24

Model No 19.PAZ.FR.3928.01

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Data on Family and Relatives Data on Education, Work and Professional Life Economic and Financial Data Customers' Financial Transaction Data Data on Risk Management and Financial Security Audio and Visual Records Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data Data on Physical Security Data on Transaction Security and Cyber Security of the Institution Reference Identifiers Digital Activity Data Card Payment Data	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	Data processing is necessary for compliance with a legal obligation to which the data controller is subject (Article 5.2 (ç) of the Data Protection Law)
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Conducting audit activities	
	Determining the Bank's / Institution's strategies	
	Designing operational activities	
	Risk management of compliance processes	
	Informing authorised public and private institutions as per the applicable laws and regulations	
	Conducting litigation and legal follow-up processes	
	Managing customer complaints	
	Managing the Bank's/Institution's operational risks	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Analysing suitability of business processes and their productivity	
	Conducting accountancy and invoice transactions	
	Setting Up and Management of the IT and infrastructure	
	Ensuring the security of physical data	
	Relationship management of support service providers, business partners or suppliers	
	Ensuring accuracy and up to dateness of the data	
	Conducting payment service activities	
	Managing customer complains	
	Ensuring the accessibility of the Bank's / Institution's services	
	Sustainability and Activities on Sustainability	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Customers' Financial Transaction Data Card Payment Data Audio and Visual Records Digital Activity Data Data on Transaction Security and Cyber Security of the Institution Data on Request / Complaint and Reputation Management	Conducting litigation and legal follow-up processes	Data processing is necessary for the establishment, exercise or protection of any right (Article 5.2 (e) of the Data Protection Law)
	Managing customer complaints	
	Managing customer relations	
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Data on Facilities Physical Security Data on Education, Work and Professional Life Customers' Financial Transaction Data Data on Risk Management and Financial Security Reference Identifiers Families and Relatives Audio and Visual Records Data on Transaction Security and Cyber Security of the Institution Digital Activity Data Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data	Designing the strategy of the Bank/Institution	Data processing is necessary for the legitimate interests pursued by the data controller (Article 5.2 (f) of the Data Protection Law)
	Analysing the Bank's/Institutions systems and their development	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Event management of the Bank for third parties outside the Institution	
	Conducting audit activities	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Managing activities aiming for customer satisfaction	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Managing the Bank's/Institution's operational risks	
	Sustainability and Activities on Sustainability	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Designing the Bank's / Institution's business processes	
	Analysing suitability of business processes and their productivity	



Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Customers' Financial Transaction Data Digital Activity Data Card Payment Data Data on Education, Work and Professional Life Data on Risk Management and Financial Security Families and Relatives Location Data Audio and Visual Records Marketing Data	Conducting cross sale activities for products and services provided	Explicit consent of the data subject (Article 5.1 of the Data Protection Law)
	Determining products and services personalized for you	
	Conducting advertising, campaign and promotion activities in all mediums including digital channels and communicate with you within this respect	
	Conducting data analyse, modelling and scoring activities for marketing purposes	
	Establishing and increasing customer loyalty to product and services	
	Communicate with you in order to conduct a satisfaction and marketing survey on the products and services for marketing purposes	
Data on Criminal Convictions and Security Measures	Risk Management on compliance processes	Processing of Sensitive Data is stipulated under the relevant law (Article 6.3 of the Data Protection Law)
	Conducting litigation and legal follow-up processes	
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Conducting audit activities	

## 5. Transferring Your Personal Data to Third Parties and Purpose of Transfer

Your personal data processed by TEB and categories in the list above might be transferred to the below mentioned recipients for the mentioned purposes and for the legal reasons stipulated under Article 8 and 9 of the Data Protection Law.

Recipient	Purpose of Transfer
Public and Private Institutions authorised to receive information/documents and legal institutions (Banking Regulation and Supervision Agency, Capital Market Board, Central Bank of Turkey, Turkish Revenue Administration, Financial Crimes Investigation Board, Interbank Card Centre, Risk Centre of the Banks Association of Turkey, Courts, prosecution offices etc.)	Informing the authorised public and private institutions as per the applicable laws and regulations Setting up the required actions to conduct lawfully the Bank's/Institutions activities Ensuring the legal and physical security of the Bank Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Institutions providing external service or support service (any advisor, institution or party from whom TEB provides supplementary services or is collaboration for archive services, card/statement printing services, call centre, IT services, Bank's operational services, collection management, audit, rating services etc.)	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities Ensuring the legal and physical security of the bank Setting up the required actions to conduct lawfully the Bank's / Institutions activities Conducting marketing and cross sale activities
Business Partners (Institutions with whom a cooperation relation has been established for providing financial product and services) and TEB Group*	Conduct the required activities for the Bank's commercial activities Improve the Bank's reputation and business relations and determine the Bank's strategies Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conducting marketing and cross sale activities
Local and Foreign Banks and Financial Institutions, Contracted Merchants, Payment Service Providers, Other Financial Institutions which are members of a payment program, Institutions providing international card payment systems such as Mastercard Int. Inc. and Visa Inc. or local institutions providing card payment systems	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Direct or Indirect Shareholders of TEB and BNP Paribas Group **	Disclosing information/documents to our main shareholder for the purposes of preparing a consolidated financial statement, risk management, internal audit and credit assessment to the extent permitted as per the applicable banking regulations Improve the Bank's reputation and business relations and determine the Bank's strategies
* 'TEB Group' Means a group of companies including TEB Holding A.Ş. and our bank and composed of affiliates. You may access to detailed information on such group of companies from <a href="https://www.teb.com.tr/about-teb/TEB-group">https://www.teb.com.tr/about-teb/TEB-group</a>	
** 'BNP Paribas Group' Means a group of companies composed of BNP Paribas S.A. and its affiliates	

## 6. Your Rights with Respect to Your Personal Data

You might exercise your below mentioned rights with respect to your personal data by contacting TEB as per article 11 of the Data Protection Law.

- To learn whether your personal data has been processed or not,
- If personal data has been processed, to request information on such personal data,
- To learn the purpose of processing your personal data and whether such personal data is used for intended purposes,
- To learn the third parties to whom your personal data is transferred in Turkey or abroad,
- To request the rectification of your incomplete or inaccurate data, if any and notify such rectification to third parties to which such personal data had been transferred,
- To request the erasure, destruction or anonymisation of your personal data if the legal reason for its processing no longer exists and request the notification of such erasure, destruction or anonymisation to third parties to which the relevant personal data had been transferred,
- To object to the processing of your personal data by automatic systems if such analyse leads to an unfavourable result for the data subject,
- To request compensation for your damage arising from the unlawful processing of your personal data.

You might exercise your above-mentioned rights by filling out the application form published under <https://www.teb.com.tr/pdp> or available in our Bank's branches and deliver it to the Bank through any mean listed in below.

You might fill in the form and;

- Deliver it in written form to our branches,
- Send it to our Bank's address via return receipt registered mail or through notary public
- To [kvkkbasvuru@teb.com.tr](mailto:kvkkbasvuru@teb.com.tr) e-mail address via your e-mail previously notified to our Bank or by signing the relevant form with secure electronic signature.
- With Registered Electronic Mail (KEP) from your Registered Electronic Mail account to [turkekonombankasi@hs03.kep.tr](mailto:turkekonombankasi@hs03.kep.tr) address.

Also, you might transmit your request through any other method stipulated under the Communiqué on the Procedure and Principles on the Application to the Data Controller.

Our Bank would respond to your request free of charge as soon as possible following the receipt thereof and within thirty days at the latest. In principle, your application is processed free of charge. However, if the response requires any cost, fees might be charged in accordance with the tariff set by the Personal Data Protection Board.

During the preparation of a response to your query, our Bank might request from you any additional document and information for the verification of your identity and clarify your request. If case, you would not share the relevant information and documents your application our Bank reserves the right not to respond to your query due to ensuring the security of your data.



# TEB

## DATA PROTECTION NOTICE ON PROCESSING CUSTOMERS PERSONAL DATA FOR CREDIT PROCESSES

### 1. Purpose and Scope

We, Türk Ekonomi Bankası A.Ş. ("TEB"), are acting as data controller for data processing activities subject to this Data Protection Notice on Processing Customers Personal Data for Credit Processes ("Data Protection Notice") as per the Law on Personal Data Protection numbered 6698 and the relevant regulations ("Data Protection Regulation"). As having responsibilities as a bank, we do exercise outmost care and diligence for the lawful processing of your personal data in line with the principles of the Data Protection Regulation and other regulations and to preserve its confidentiality and security.

This Data Protection Notice has been prepared in order to inform you by TEB on collection methods, legal reasons for personal data processing and purpose thereof, persons/institutions to whom personal data are been transferred and purpose of transfer and your rights as data subject as per Data Protection Regulation.

You may find relevant information from the below table regarding our bank processing your personal data.

Trade Name:	Türk Ekonomi Bankası A.Ş.
Address:	İnkılap Mahallesi, Sokullu Caddesi, No: 7A Ümraniye/İSTANBUL
Mersis Number:	0876004342000105
Trade Registry Number:	189356
Communication channels:	Communication Channels under <a href="https://www.teb.com.tr/contact-us/">https://www.teb.com.tr/contact-us/</a>

You might access the data protection notice on the main activities of our bank from <https://www.teb.com.tr/pdp>

## 2. Categories of Processed Personal Data

Personal data categories processed by TEB as data controller and examples of the personal data belonging to these categories are listed in the below table.

Categories of Processed Personal Data	Examples of Personal Data
Identity Data	Name surname, names of the mother-father, date of birth, birthplace, data in the identity documents, ID number/passport number/tax number
Contact Data	Home/work address, address number, e-mail, telephone number
Data on Family and Relatives	Civil status, information on family and relatives such as number of children
Data on Education, Work and Professional Life	Profession, work experience, current work, education
Economic and Financial Data	Information on income and assets, credit records, information on tax payments, data on financial products and services
Customers' Financial Transaction Data	Transactions and details relating to financial products and services, credit card usage information, bank card usage information, credit/deposit/FX account transactions, information on check/ bonds, bank receipt information, payment instructions
Card Payment Data	Credit card/bank card number, expiry date, security code
Digital Activity Data	Data collected by the usage of cookies and similar track methods such as IP address, information on the device
Data on Transaction Security and Cyber Security of the Institution	Username, password, audit trail record, log records, alerts on the prevention of fraud, other data on the security of the bank's cyber space
Data on Risk Management and Financial Security	Know your customer, information that might be used for the prevention of terrorism, prevention of fraud and risk management (work/field of activity, source of income, credit risk score, credit and risk information)
Audio and Visual Records	Call Centre/telephone records, video chat records, photo and video records
Reference Identifiers	Reference information allowing the Bank/Institution to identify the customer (customer number, product application number, transaction number, agreement number)
Data on Request / Complaint and Reputation Management	Request and complaints made through various channels, responses of the Bank to the requests and complaints, information used by the bank for reputation management
Legal Transaction Data	Information on Litigation, legal follow-up and mediation cases, demands submitted from legal authorities and Responses of the Bank/Institution to such requests.
Data on Facilities Physical Security	Entry - exit information of the visitors, camera records

Location Data	Location Data of the data subject
Marketing Data	Financial product and service usage habits, previous shopping and financial transaction information, areas of interest and preferences that might be relevant for financial product and service offers, survey results conducted for marketing purposes, information on campaign participation and preferences
Processed Special Category of Personal Data	Examples of Special Category of Personal Data
Data on Criminal Convictions and Security Measures	Information on criminal record and conviction, protection measures

The special category of personal data declared to be processed as per the above table is subject to a strict protection regime due to its sensitive nature and classified as special category of personal data. As TEB we make our best effort not to process your special categories of personal data during the data processing unless it is required and necessary. In this regard, only Criminal Convictions and Security Measures data which is one of the special categories of personal data might be processed in case you are involved in the relevant processes. The management of financial security processes (money laundering of the crime revenues, terrorism financing, corruption, bribery, prevention of fraud) might be given as an example of the activities where criminal convictions and security measure data might be processed.

### 3. Personal Data Collection Methods

Your personal data might be collected directly from you, or third parties as explained in below with automatic or non-automatic methods.

#### (i) Methods of Collecting the Personal Data Directly From You

- Information or documents containing your personal data might be collected through oral or written conversations made face to face with the TEB head quarter, branch, direct and active sale teams or through electronic communication tools (telephone/call centre, SMS, fax, e-mail, video call etc.) or with non-automatic methods using post, cargo, or courier services.
- Information or documents containing your personal data might be collected automatically from mobile banking channels, website of our bank, ATMs, kiosk, turbo devices, self-service units with assistance support, call centre and branch IVR system, SMA, CCTV.

#### (ii) Methods of Collecting the Personal Data From Third Parties

- Information or documents containing your personal data might be collected by non-automatic means using physical or electronic channels from business partner distributors or sale offices, e-commerce websites, association, institution or private persons such as chamber of commerce, chamber of artisans, trade associations, judicial authorities and public and private institutions authorised by law such as Banking Regulation and Supervision Agency, representatives such as power of attorneys, guardian, custodians to the extent permitted by law and the executed agreements.
- Information or documents containing your personal data might be automatically collected from the authorised public and private institutions database (Identity Sharing System, Address Sharing System, Central Population Administration System, Central Registration System, Land Registry and Cadastre Information System, Risk Centre of the Bank's Association of Turkey, Trade Registry Offices, Turkish Revenue Administration, Interbank Card Centre, Ministry of Treasury and Finance, General Directorate of Highways and person and institutions issuing invoices, to whom you have contact for your payments and collections etc.) provided that there is a system integration and to the extent permitted by law and the executed agreements.

#### 4. Purposes of Processing Personal Data and Legal Reasons

Your personal data processed by TEB and categorised in the list above might be processed for the purposes and legal reasons stated in the below table.

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Digital Activity Data Audio and Visual Records Legal Transaction Data Data on Transaction Security and Cyber Security of the Institution Card Payment Data Reference Identifiers Customers' Financial Transaction Data Data on Request/Complaint and Reputation Management Data on Family and Relatives Data on Education, Work and Professional Life Data on Risk Management and Financial Security	Informing authorised public and private institutions as per the applicable laws and regulations	Data processing is explicitly provided for by the law (Article 5.2 (a) of the Data Protection Law)
	Ensuring the physical security of the Bank / Institution	
	Setting up the required actions to conduct lawfully the Bank's / Institution's activities	
	Relationship management of support service providers, business partners or suppliers	
	Conducting processes related to payment services	
	Ensuring accuracy and up to dateness of the data	
	Conducting accountancy and invoice transactions	
	Conducting audit activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Customers' Financial Transaction Data Economic and Financial Data Data on Risk Management and Financial Security Data on Request / Complaint and Reputation Management Location Data Digital Activity Data Reference Identifiers Audio and Visual Records Data on Family and Relatives Data on Education, Work and Professional Life Data on Transaction Security and Cyber Security of the Institution Card Payment Data Legal Transaction Data	Conducting the sales process of the Bank's/Institution's services	Data processing is required for the establishment and performance of the contract between you and TEB (Article 5.2 (c) of the Data Protection Law)
	Conducting customer services	
	Conducting POS processes	
	Conducting payment service processes	
	Conducting ID verification processes	
	Analysing suitability of business processes and their productivity	
	Managing customer relations	
	Managing customer complains	
	Designing the Bank's /Institution's business processes	
	Relationship management of support service providers, business partners or suppliers	
	Follow-up agreement processes	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Management of IT security	
	Ensuring the accessibility of the Bank's / Institution's services	
	Conducting litigation and legal follow-up processes	
	Conducting accountancy and invoice transactions	



Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Data on Family and Relatives Data on Education, Work and Professional Life Economic and Financial Data Customers' Financial Transaction Data Data on Risk Management and Financial Security Audio and Visual Records Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data Data on Physical Security Data on Transaction Security and Cyber Security of the Institution Reference Identifiers Digital Activity Data Card Payment Data	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	Data processing is necessary for compliance with a legal obligation to which the data controller is subject (Article 5.2 (ç) of the Data Protection Law)
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Conducting audit activities	
	Determining the Bank's / Institution's strategies	
	Designing operational activities	
	Risk management of compliance processes	
	Informing authorised public and private institutions as per the applicable laws and regulations	
	Conducting litigation and legal follow-up processes	
	Managing customer complaints	
	Managing the Bank's/Institution's operational risks	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Analysing suitability of business processes and their productivity	
	Conducting accountancy and invoice transactions	
	Setting Up and Management of the IT and infrastructure	
	Ensuring the security of physical data	
	Relationship management of support service providers, business partners or suppliers	
	Ensuring accuracy and up to dateness of the data	
	Conducting payment service activities	
	Managing customer complains	
	Ensuring the accessibility of the Bank's / Institution's services	
	Sustainability and Activities on Sustainability	



Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Customers' Financial Transaction Data Card Payment Data Audio and Visual Records Digital Activity Data Data on Transaction Security and Cyber Security of the Institution Data on Request / Complaint and Reputation Management	Conducting litigation and legal follow-up processes	Data processing is necessary for the establishment, exercise or protection of any right (Article 5.2 (e) of the Data Protection Law)
	Managing customer complaints	
	Managing customer relations	
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Data on Facilities Physical Security Data on Education, Work and Professional Life Customers' Financial Transaction Data Data on Risk Management and Financial Security Reference Identifiers Families and Relatives Audio and Visual Records Data on Transaction Security and Cyber Security of the Institution Digital Activity Data Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data	Designing the strategy of the Bank/Institution	Data processing is necessary for the legitimate interests pursued by the data controller (Article 5.2 (f) of the Data Protection Law)
	Analysing the Bank's/Institutions systems and their development	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Event management of the Bank for third parties outside the Institution	
	Conducting audit activities	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Managing activities aiming for customer satisfaction	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Managing the Bank's/Institution's operational risks	
	Sustainability and Activities on Sustainability	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Designing the Bank's / Institution's business processes	
	Analysing suitability of business processes and their productivity	



Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Customers' Financial Transaction Data Digital Activity Data Card Payment Data Data on Education, Work and Professional Life Data on Risk Management and Financial Security Families and Relatives Location Data Audio and Visual Records Marketing Data	Conducting cross sale activities for products and services provided	Explicit consent of the data subject (Article 5.1 of the Data Protection Law)
	Determining products and services personalized for you	
	Conducting advertising, campaign and promotion activities in all mediums including digital channels and communicate with you within this respect	
	Conducting data analyse, modelling and scoring activities for marketing purposes	
	Establishing and increasing customer loyalty to product and services	
	Communicate with you in order to conduct a satisfaction and marketing survey on the products and services for marketing purposes	
Data on Criminal Convictions and Security Measures	Risk Management on compliance processes	Processing of Sensitive Data is stipulated under the relevant law (Article 6.3 of the Data Protection Law)
	Conducting litigation and legal follow-up processes	
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Conducting audit activities	

## 5. Transferring Your Personal Data to Third Parties and Purpose of Transfer

Your personal data processed by TEB and categories in the list above might be transferred to the below mentioned recipients for the mentioned purposes and for the legal reasons stipulated under Article 8 and 9 of the Data Protection Law.

Recipient	Purpose of Transfer
Public and Private Institutions authorised to receive information/documents and legal institutions (Banking Regulation and Supervision Agency, Capital Market Board, Central Bank of Turkey, Turkish Revenue Administration, Financial Crimes Investigation Board, Interbank Card Centre, Risk Centre of the Banks Association of Turkey, Courts, prosecution offices etc.)	Informing the authorised public and private institutions as per the applicable laws and regulations Setting up the required actions to conduct lawfully the Bank's/Institutions activities Ensuring the legal and physical security of the Bank Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Institutions providing external service or support service (any advisor, institution or party from whom TEB provides supplementary services or is collaboration for archive services, card/statement printing services, call centre, IT services, Bank's operational services, collection management, audit, rating services etc.)	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities Ensuring the legal and physical security of the bank Setting up the required actions to conduct lawfully the Bank's / Institutions activities Conducting marketing and cross sale activities
Business Partners (Institutions with whom a cooperation relation has been established for providing financial product and services) and TEB Group*	Conduct the required activities for the Bank's commercial activities Improve the Bank's reputation and business relations and determine the Bank's strategies Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conducting marketing and cross sale activities
Local and Foreign Banks and Financial Institutions, Contracted Merchants, Payment Service Providers, Other Financial Institutions which are members of a payment program, Institutions providing international card payment systems such as Mastercard Int. Inc. and Visa Inc. or local institutions providing card payment systems	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Direct or Indirect Shareholders of TEB and BNP Paribas Group **	Disclosing information/documents to our main shareholder for the purposes of preparing a consolidated financial statement, risk management, internal audit and credit assessment to the extent permitted as per the applicable banking regulations Improve the Bank's reputation and business relations and determine the Bank's strategies
* 'TEB Group' Means a group of companies including TEB Holding A.Ş. and our bank and composed of affiliates. You may access to detailed information on such group of companies from <a href="https://www.teb.com.tr/about-teb/TEB-group">https://www.teb.com.tr/about-teb/TEB-group</a>	
** 'BNP Paribas Group' Means a group of companies composed of BNP Paribas S.A. and its affiliates	

## 6. Your Rights with Respect to Your Personal Data

You might exercise your below mentioned rights with respect to your personal data by contacting TEB as per article 11 of the Data Protection Law.

- To learn whether your personal data has been processed or not,
- If personal data has been processed, to request information on such personal data,
- To learn the purpose of processing your personal data and whether such personal data is used for intended purposes,
- To learn the third parties to whom your personal data is transferred in Turkey or abroad,
- To request the rectification of your incomplete or inaccurate data, if any and notify such rectification to third parties to which such personal data had been transferred,
- To request the erasure, destruction or anonymisation of your personal data if the legal reason for its processing no longer exists and request the notification of such erasure, destruction or anonymisation to third parties to which the relevant personal data had been transferred,
- To object to the processing of your personal data by automatic systems if such analyse leads to an unfavourable result for the data subject,
- To request compensation for your damage arising from the unlawful processing of your personal data.

You might exercise your above-mentioned rights by filling out the application form published under <https://www.teb.com.tr/pdp> or available in our Bank's branches and deliver it to the Bank through any mean listed in below.

You might fill in the form and;

- Deliver it in written form to our branches,
- Send it to our Bank's address via return receipt registered mail or through notary public
- To [kvkbasvuru@teb.com.tr](mailto:kvkbasvuru@teb.com.tr) e-mail address via your e-mail previously notified to our Bank or by signing the relevant form with secure electronic signature.
- With Registered Electronic Mail (KEP) from your Registered Electronic Mail account to [turkekonombankasi@hs03.kep.tr](mailto:turkekonombankasi@hs03.kep.tr) address.

Also, you might transmit your request through any other method stipulated under the Communiqué on the Procedure and Principles on the Application to the Data Controller.

Our Bank would respond to your request free of charge as soon as possible following the receipt thereof and within thirty days at the latest. In principle, your application is processed free of charge. However, if the response requires any cost, fees might be charged in accordance with the tariff set by the Personal Data Protection Board.

During the preparation of a response to your query, our Bank might request from you any additional document and information for the verification of your identity and clarify your request. If case, you would not share the relevant information and documents your application our Bank reserves the right not to respond to your query due to ensuring the security of your data.



# TEB

## DATA PROTECTION NOTICE ON PROCESSING OF CUSTOMER PERSONAL DATA FOR INVESTMENT ACTIVITIES

### 1. Purpose and Scope

We, Türk Ekonomi Bankası A.Ş. ("TEB"), are acting as data controller for data processing activities subject to this Data Protection Notice on Processing Customers Personal Data for Credit Processes ("Data Protection Notice") as per the Law on Personal Data Protection numbered 6698 and the relevant regulations ("Data Protection Regulation"). As having responsibilities as a bank, we do exercise utmost care and diligence for the lawful processing of your personal data in line with the principles of the Data Protection Regulation and other regulations and to preserve its confidentiality and security.

This Data Protection Notice has been prepared in order to inform you by TEB on collection methods, legal reasons for personal data processing and purpose thereof, persons/institutions to whom personal data are been transferred and purpose of transfer and your rights as data subject as per Data Protection Regulation.

You may find relevant information from the below table regarding our bank processing your personal data.

Trade Name:	Türk Ekonomi Bankası A.Ş.
Address:	İnkılap Mahallesi, Sokullu Caddesi, No: 7A Ümraniye/İSTANBUL
Mersis Number:	0876004342000105
Trade Registry Number:	189356
Communication channels:	Communication Channels under <a href="https://www.teb.com.tr/contact-us/">https://www.teb.com.tr/contact-us/</a>

You might access the data protection notice on the main activities of our bank from <https://www.teb.com.tr/pdp>

## 2. Categories of Processed Personal Data

Personal data categories processed by TEB as data controller and examples of the personal data belonging to these categories are listed in the below table.

Categories of Processed Personal Data	Examples of Personal Data
Identity Data	Name surname, names of the mother-father, date of birth, birthplace, data in the identity documents, ID number/passport number/tax number
Contact Data	Home/work address, address number, e-mail, telephone number
Data on Family and Relatives	Civil status, information on family and relatives such as number of children
Data on Education, Work and Professional Life	Profession, work experience, current work, education
Economic and Financial Data	Information on income and assets, credit records, information on tax payments, data on financial products and services
Customers' Financial Transaction Data	Transactions and details relating to financial products and services, credit card usage information, bank card usage information, credit/deposit/FX account transactions, information on check/ bonds, bank receipt information, payment instructions
Card Payment Data	Credit card/bank card number, expiry date, security code
Digital Activity Data	Data collected by the usage of cookies and similar track methods such as IP address, information on the device
Data on Transaction Security and Cyber Security of the Institution	Username, password, audit trail record, log records, alerts on the prevention of fraud, other data on the security of the bank's cyber space
Data on Risk Management and Financial Security	Know your customer, information that might be used for the prevention of terrorism, prevention of fraud and risk management (work/field of activity, source of income, credit risk score, credit and risk information)
Audio and Visual Records	Call Centre/telephone records, video chat records, photo and video records
Reference Identifiers	Reference information allowing the Bank/Institution to identify the customer (customer number, product application number, transaction number, agreement number)
Data on Request / Complaint and Reputation Management	Request and complaints made through various channels, responses of the Bank to the requests and complaints, information used by the bank for reputation management
Legal Transaction Data	Information on Litigation, legal follow-up and mediation cases, demands submitted from legal authorities and Responses of the Bank/Institution to such requests.
Data on Facilities Physical Security	Entry - exit information of the visitors, camera records



Location Data	Location Data of the data subject
Marketing Data	Financial product and service usage habits, previous shopping and financial transaction information, areas of interest and preferences that might be relevant for financial product and service offers, survey results conducted for marketing purposes, information on campaign participation and preferences
Processed Special Category of Personal Data	Examples of Special Category of Personal Data
Data on Criminal Convictions and Security Measures	Information on criminal record and conviction, protection measures

The special category of personal data declared to be processed as per the above table is subject to a strict protection regime due to its sensitive nature and classified as special category of personal data. As TEB we make our best effort not to process your special categories of personal data during the data processing unless it is required and necessary. In this regard, only Criminal Convictions and Security Measures data which is one of the special categories of personal data might be processed in case you are involved in the relevant processes. The management of financial security processes (money laundering of the crime revenues, terrorism financing, corruption, bribery, prevention of fraud) might be given as an example of the activities where criminal convictions and security measure data might be processed.

### 3. Personal Data Collection Methods

Your personal data might be collected directly from you, or third parties as explained in below with automatic or non-automatic methods.

#### (i) Methods of Collecting the Personal Data Directly From You

- Information or documents containing your personal data might be collected through oral or written conversations made face to face with the TEB head quarter, branch, direct and active sale teams or through electronic communication tools (telephone/call centre, SMS, fax, e-mail, video call etc.) or with non-automatic methods using post, cargo, or courier services.
- Information or documents containing your personal data might be collected automatically from mobile banking channels, website of our bank, ATMs, kiosk, turbo devices, self-service units with assistance support, call centre and branch IVR system, SMA, CCTV.

#### (ii) Methods of Collecting the Personal Data From Third Parties

- Information or documents containing your personal data might be collected by non-automatic means using physical or electronic channels from business partner distributors or sale offices, e-commerce websites, association, institution or private persons such as chamber of commerce, chamber of artisans, trade associations, judicial authorities and public and private institutions authorised by law such as Banking Regulation and Supervision Agency, representatives such as power of attorneys, guardian, custodians to the extent permitted by law and the executed agreements.
- Information or documents containing your personal data might be automatically collected from the authorised public and private institutions database (Identity Sharing System, Address Sharing System, Central Population Administration System, Central Registration System, Land Registry and Cadastre Information System, Risk Centre of the Bank's Association of Turkey, Trade Registry Offices, Turkish Revenue Administration, Interbank Card Centre, Ministry of Treasury and Finance, General Directorate of Highways and person and institutions issuing invoices, to whom you have contact for your payments and collections etc.) provided that there is a system integration and to the extent permitted by law and the executed agreements.



#### 4. Purposes of Processing Personal Data and Legal Reasons

Your personal data processed by TEB and categorised in the list above might be processed for the purposes and legal reasons stated in the below table.

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Digital Activity Data Audio and Visual Records Legal Transaction Data Data on Transaction Security and Cyber Security of the Institution Card Payment Data Reference Identifiers Customers' Financial Transaction Data Data on Request/Complaint and Reputation Management Data on Family and Relatives Data on Education, Work and Professional Life Data on Risk Management and Financial Security	Informing authorised public and private institutions as per the applicable laws and regulations	Data processing is explicitly provided for by the law (Article 5.2 (a) of the Data Protection Law)
	Ensuring the physical security of the Bank / Institution	
	Setting up the required actions to conduct lawfully the Bank's / Institution's activities	
	Relationship management of support service providers, business partners or suppliers	
	Conducting processes related to payment services	
	Ensuring accuracy and up to dateness of the data	
	Conducting accountancy and invoice transactions	
	Conducting audit activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Customers' Financial Transaction Data Economic and Financial Data Data on Risk Management and Financial Security Data on Request / Complaint and Reputation Management Location Data Digital Activity Data Reference Identifiers Audio and Visual Records Data on Family and Relatives Data on Education, Work and Professional Life Data on Transaction Security and Cyber Security of the Institution Card Payment Data Legal Transaction Data	Conducting the sales process of the Bank's/Institution's services	Data processing is required for the establishment and performance of the contract between you and TEB (Article 5.2 (c) of the Data Protection Law)
	Conducting customer services	
	Conducting POS processes	
	Conducting payment service processes	
	Conducting ID verification processes	
	Analysing suitability of business processes and their productivity	
	Managing customer relations	
	Managing customer complains	
	Designing the Bank's /Institution's business processes	
	Relationship management of support service providers, business partners or suppliers	
	Follow-up agreement processes	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Management of IT security	
	Ensuring the accessibility of the Bank's / Institution's services	
	Conducting litigation and legal follow-up processes	
	Conducting accountancy and invoice transactions	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Data on Family and Relatives Data on Education, Work and Professional Life Economic and Financial Data Customers' Financial Transaction Data Data on Risk Management and Financial Security Audio and Visual Records Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data Data on Physical Security Data on Transaction Security and Cyber Security of the Institution Reference Identifiers Digital Activity Data Card Payment Data	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	Data processing is necessary for compliance with a legal obligation to which the data controller is subject (Article 5.2 (ç) of the Data Protection Law)
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Conducting audit activities	
	Determining the Bank's / Institution's strategies	
	Designing operational activities	
	Risk management of compliance processes	
	Informing authorised public and private institutions as per the applicable laws and regulations	
	Conducting litigation and legal follow-up processes	
	Managing customer complaints	
	Managing the Bank's/Institution's operational risks	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Analysing suitability of business processes and their productivity	
	Conducting accountancy and invoice transactions	
	Setting Up and Management of the IT and infrastructure	
	Ensuring the security of physical data	
	Relationship management of support service providers, business partners or suppliers	
	Ensuring accuracy and up to dateness of the data	
	Conducting payment service activities	
	Managing customer complains	
	Ensuring the accessibility of the Bank's / Institution's services	
	Sustainability and Activities on Sustainability	



Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Customers' Financial Transaction Data Card Payment Data Audio and Visual Records Digital Activity Data Data on Transaction Security and Cyber Security of the Institution Data on Request / Complaint and Reputation Management	Conducting litigation and legal follow-up processes	Data processing is necessary for the establishment, exercise or protection of any right (Article 5.2 (e) of the Data Protection Law)
	Managing customer complaints	
	Managing customer relations	
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Data on Facilities Physical Security Data on Education, Work and Professional Life Customers' Financial Transaction Data Data on Risk Management and Financial Security Reference Identifiers Families and Relatives Audio and Visual Records Data on Transaction Security and Cyber Security of the Institution Digital Activity Data Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data	Designing the strategy of the Bank/Institution	Data processing is necessary for the legitimate interests pursued by the data controller (Article 5.2 (f) of the Data Protection Law)
	Analysing the Bank's/Institutions systems and their development	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Event management of the Bank for third parties outside the Institution	
	Conducting audit activities	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Managing activities aiming for customer satisfaction	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Managing the Bank's/Institution's operational risks	
	Sustainability and Activities on Sustainability	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Designing the Bank's / Institution's business processes	
	Analysing suitability of business processes and their productivity	



Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Customers' Financial Transaction Data Digital Activity Data Card Payment Data Data on Education, Work and Professional Life Data on Risk Management and Financial Security Families and Relatives Location Data Audio and Visual Records Marketing Data	Conducting cross sale activities for products and services provided	Explicit consent of the data subject (Article 5.1 of the Data Protection Law)
	Determining products and services personalized for you	
	Conducting advertising, campaign and promotion activities in all mediums including digital channels and communicate with you within this respect	
	Conducting data analyse, modelling and scoring activities for marketing purposes	
	Establishing and increasing customer loyalty to product and services	
	Communicate with you in order to conduct a satisfaction and marketing survey on the products and services for marketing purposes	
Data on Criminal Convictions and Security Measures	Risk Management on compliance processes	Processing of Sensitive Data is stipulated under the relevant law (Article 6.3 of the Data Protection Law)
	Conducting litigation and legal follow-up processes	
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Conducting audit activities	

## 5. Transferring Your Personal Data to Third Parties and Purpose of Transfer

Your personal data processed by TEB and categories in the list above might be transferred to the below mentioned recipients for the mentioned purposes and for the legal reasons stipulated under Article 8 and 9 of the Data Protection Law.

Recipient	Purpose of Transfer
Public and Private Institutions authorised to receive information/documents and legal institutions (Banking Regulation and Supervision Agency, Capital Market Board, Central Bank of Turkey, Turkish Revenue Administration, Financial Crimes Investigation Board, Interbank Card Centre, Risk Centre of the Banks Association of Turkey, Courts, prosecution offices etc.)	Informing the authorised public and private institutions as per the applicable laws and regulations Setting up the required actions to conduct lawfully the Bank's/Institutions activities Ensuring the legal and physical security of the Bank Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Institutions providing external service or support service (any advisor, institution or party from whom TEB provides supplementary services or is collaboration for archive services, card/statement printing services, call centre, IT services, Bank's operational services, collection management, audit, rating services etc.)	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities Ensuring the legal and physical security of the bank Setting up the required actions to conduct lawfully the Bank's / Institutions activities Conducting marketing and cross sale activities
Business Partners (Institutions with whom a cooperation relation has been established for providing financial product and services) and TEB Group*	Conduct the required activities for the Bank's commercial activities Improve the Bank's reputation and business relations and determine the Bank's strategies Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conducting marketing and cross sale activities
Local and Foreign Banks and Financial Institutions, Contracted Merchants, Payment Service Providers, Other Financial Institutions which are members of a payment program, Institutions providing international card payment systems such as Mastercard Int. Inc. and Visa Inc. or local institutions providing card payment systems	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Direct or Indirect Shareholders of TEB and BNP Paribas Group **	Disclosing information/documents to our main shareholder for the purposes of preparing a consolidated financial statement, risk management, internal audit and credit assessment to the extent permitted as per the applicable banking regulations Improve the Bank's reputation and business relations and determine the Bank's strategies
* 'TEB Group' Means a group of companies including TEB Holding A.Ş. and our bank and composed of affiliates. You may access to detailed information on such group of companies from <a href="https://www.teb.com.tr/about-teb/TEB-group">https://www.teb.com.tr/about-teb/TEB-group</a>	
** 'BNP Paribas Group' Means a group of companies composed of BNP Paribas S.A. and its affiliates	

## 6. Your Rights with Respect to Your Personal Data

You might exercise your below mentioned rights with respect to your personal data by contacting TEB as per article 11 of the Data Protection Law.

- To learn whether your personal data has been processed or not,
- If personal data has been processed, to request information on such personal data,
- To learn the purpose of processing your personal data and whether such personal data is used for intended purposes,
- To learn the third parties to whom your personal data is transferred in Turkey or abroad,
- To request the rectification of your incomplete or inaccurate data, if any and notify such rectification to third parties to which such personal data had been transferred,
- To request the erasure, destruction or anonymisation of your personal data if the legal reason for its processing no longer exists and request the notification of such erasure, destruction or anonymisation to third parties to which the relevant personal data had been transferred,
- To object to the processing of your personal data by automatic systems if such analyse leads to an unfavourable result for the data subject,
- To request compensation for your damage arising from the unlawful processing of your personal data.

You might exercise your above-mentioned rights by filling out the application form published under <https://www.teb.com.tr/pdp> or available in our Bank's branches and deliver it to the Bank through any mean listed in below.

You might fill in the form and;

- Deliver it in written form to our branches,
- Send it to our Bank's address via return receipt registered mail or through notary public
- To [kvkkbasvuru@teb.com.tr](mailto:kvkkbasvuru@teb.com.tr) e-mail address via your e-mail previously notified to our Bank or by signing the relevant form with secure electronic signature.
- With Registered Electronic Mail (KEP) from your Registered Electronic Mail account to [turkekonombankasi@hs03.kep.tr](mailto:turkekonombankasi@hs03.kep.tr) address.

Also, you might transmit your request through any other method stipulated under the Communiqué on the Procedure and Principles on the Application to the Data Controller.

Our Bank would respond to your request free of charge as soon as possible following the receipt thereof and within thirty days at the latest. In principle, your application is processed free of charge. However, if the response requires any cost, fees might be charged in accordance with the tariff set by the Personal Data Protection Board.

During the preparation of a response to your query, our Bank might request from you any additional document and information for the verification of your identity and clarify your request. If case, you would not share the relevant information and documents your application our Bank reserves the right not to respond to your query due to ensuring the security of your data.



# TEB

## DATA PROTECTION NOTICE ON PROCESSING OF CUSTOMER PERSONAL DATA FOR INSURANCE ACTIVITIES

### 1. Purpose and Scope

We, Türk Ekonomi Bankası A.Ş. ("TEB"), are acting as data controller for data processing activities subject to this Data Protection Notice on Processing Customers Personal Data for Credit Processes ("Data Protection Notice") as per the Law on Personal Data Protection numbered 6698 and the relevant regulations ("Data Protection Regulation"). As having responsibilities as a bank, we do exercise utmost care and diligence for the lawful processing of your personal data in line with the principles of the Data Protection Regulation and other regulations and to preserve its confidentiality and security.

This Data Protection Notice has been prepared in order to inform you by TEB on collection methods, legal reasons for personal data processing and purpose thereof, persons/institutions to whom personal data are been transferred and purpose of transfer and your rights as data subject as per Data Protection Regulation.

You may find relevant information from the below table regarding our bank processing your personal data.

Trade Name:	Türk Ekonomi Bankası A.Ş.
Address:	İnkılap Mahallesi, Sokullu Caddesi, No: 7A Ümraniye/İSTANBUL
Mersis Number:	0876004342000105
Trade Registry Number:	189356
Communication channels:	Communication Channels under <a href="https://www.teb.com.tr/contact-us/">https://www.teb.com.tr/contact-us/</a>

You might access the data protection notice on the main activities of our bank from <https://www.teb.com.tr/pdp>



## 2. Categories of Processed Personal Data

Personal data categories processed by TEB as data controller and examples of the personal data belonging to these categories are listed in the below table.

Categories of Processed Personal Data	Examples of Personal Data
Identity Data	Name surname, names of the mother-father, date of birth, birthplace, data in the identity documents, ID number/passport number/tax number
Contact Data	Home/work address, address number, e-mail, telephone number
Data on Family and Relatives	Civil status, information on family and relatives such as number of children
Data on Education, Work and Professional Life	Profession, work experience, current work, education
Economic and Financial Data	Information on income and assets, credit records, information on tax payments, data on financial products and services
Customers' Financial Transaction Data	Transactions and details relating to financial products and services, credit card usage information, bank card usage information, credit/deposit/FX account transactions, information on check/ bonds, bank receipt information, payment instructions
Card Payment Data	Credit card/bank card number, expiry date, security code
Digital Activity Data	Data collected by the usage of cookies and similar track methods such as IP address, information on the device
Data on Transaction Security and Cyber Security of the Institution	Username, password, audit trail record, log records, alerts on the prevention of fraud, other data on the security of the bank's cyber space
Data on Risk Management and Financial Security	Know your customer, information that might be used for the prevention of terrorism, prevention of fraud and risk management (work/field of activity, source of income, credit risk score, credit and risk information)
Audio and Visual Records	Call Centre/telephone records, video chat records, photo and video records
Reference Identifiers	Reference information allowing the Bank/Institution to identify the customer (customer number, product application number, transaction number, agreement number)
Data on Request / Complaint and Reputation Management	Request and complaints made through various channels, responses of the Bank to the requests and complaints, information used by the bank for reputation management
Legal Transaction Data	Information on Litigation, legal follow-up and mediation cases, demands submitted from legal authorities and Responses of the Bank/Institution to such requests.
Data on Facilities Physical Security	Entry - exit information of the visitors, camera records

Location Data	Location Data of the data subject
Marketing Data	Financial product and service usage habits, previous shopping and financial transaction information, areas of interest and preferences that might be relevant for financial product and service offers, survey results conducted for marketing purposes, information on campaign participation and preferences
Processed Special Category of Personal Data	Examples of Special Category of Personal Data
Data on Criminal Convictions and Security Measures	Information on criminal record and conviction, protection measures

The special category of personal data declared to be processed as per the above table is subject to a strict protection regime due to its sensitive nature and classified as special category of personal data. As TEB we make our best effort not to process your special categories of personal data during the data processing unless it is required and necessary. In this regard, only Criminal Convictions and Security Measures data which is one of the special categories of personal data might be processed in case you are involved in the relevant processes. The management of financial security processes (money laundering of the crime revenues, terrorism financing, corruption, bribery, prevention of fraud) might be given as an example of the activities where criminal convictions and security measure data might be processed.

### 3. Personal Data Collection Methods

Your personal data might be collected directly from you, or third parties as explained in below with automatic or non-automatic methods.

#### (i) Methods of Collecting the Personal Data Directly From You

- Information or documents containing your personal data might be collected through oral or written conversations made face to face with the TEB head quarter, branch, direct and active sale teams or through electronic communication tools (telephone/call centre, SMS, fax, e-mail, video call etc.) or with non-automatic methods using post, cargo, or courier services.
- Information or documents containing your personal data might be collected automatically from mobile banking channels, website of our bank, ATMs, kiosk, turbo devices, self-service units with assistance support, call centre and branch IVR system, SMA, CCTV.

#### (ii) Methods of Collecting the Personal Data From Third Parties

- Information or documents containing your personal data might be collected by non-automatic means using physical or electronic channels from business partner distributors or sale offices, e-commerce websites, association, institution or private persons such as chamber of commerce, chamber of artisans, trade associations, judicial authorities and public and private institutions authorised by law such as Banking Regulation and Supervision Agency, representatives such as power of attorneys, guardian, custodians to the extent permitted by law and the executed agreements.
- Information or documents containing your personal data might be automatically collected from the authorised public and private institutions database (Identity Sharing System, Address Sharing System, Central Population Administration System, Central Registration System, Land Registry and Cadastre Information System, Risk Centre of the Bank's Association of Turkey, Trade Registry Offices, Turkish Revenue Administration, Interbank Card Centre, Ministry of Treasury and Finance, General Directorate of Highways and person and institutions issuing invoices, to whom you have contact for your payments and collections etc.) provided that there is a system integration and to the extent permitted by law and the executed agreements.

#### 4. Purposes of Processing Personal Data and Legal Reasons

Your personal data processed by TEB and categorised in the list above might be processed for the purposes and legal reasons stated in the below table.

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Digital Activity Data Audio and Visual Records Legal Transaction Data Data on Transaction Security and Cyber Security of the Institution Card Payment Data Reference Identifiers Customers' Financial Transaction Data Data on Request/Complaint and Reputation Management Data on Family and Relatives Data on Education, Work and Professional Life Data on Risk Management and Financial Security	Informing authorised public and private institutions as per the applicable laws and regulations	Data processing is explicitly provided for by the law (Article 5.2 (a) of the Data Protection Law)
	Ensuring the physical security of the Bank / Institution	
	Setting up the required actions to conduct lawfully the Bank's / Institution's activities	
	Relationship management of support service providers, business partners or suppliers	
	Conducting processes related to payment services	
	Ensuring accuracy and up to dateness of the data	
	Conducting accountancy and invoice transactions	
	Conducting audit activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Customers' Financial Transaction Data Economic and Financial Data Data on Risk Management and Financial Security Data on Request / Complaint and Reputation Management Location Data Digital Activity Data Reference Identifiers Audio and Visual Records Data on Family and Relatives Data on Education, Work and Professional Life Data on Transaction Security and Cyber Security of the Institution Card Payment Data Legal Transaction Data	Conducting the sales process of the Bank's/Institution's services	Data processing is required for the establishment and performance of the contract between you and TEB (Article 5.2 (c) of the Data Protection Law)
	Conducting customer services	
	Conducting POS processes	
	Conducting payment service processes	
	Conducting ID verification processes	
	Analysing suitability of business processes and their productivity	
	Managing customer relations	
	Managing customer complains	
	Designing the Bank's /Institution's business processes	
	Relationship management of support service providers, business partners or suppliers	
	Follow-up agreement processes	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Management of IT security	
	Ensuring the accessibility of the Bank's / Institution's services	
	Conducting litigation and legal follow-up processes	
	Conducting accountancy and invoice transactions	

Versiyon No V1.2024.08.24

Model No 19.PAZ.FR.3928.01

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Data on Family and Relatives Data on Education, Work and Professional Life Economic and Financial Data Customers' Financial Transaction Data Data on Risk Management and Financial Security Audio and Visual Records Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data Data on Physical Security Data on Transaction Security and Cyber Security of the Institution Reference Identifiers Digital Activity Data Card Payment Data	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	Data processing is necessary for compliance with a legal obligation to which the data controller is subject (Article 5.2 (ç) of the Data Protection Law)
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Conducting audit activities	
	Determining the Bank's / Institution's strategies	
	Designing operational activities	
	Risk management of compliance processes	
	Informing authorised public and private institutions as per the applicable laws and regulations	
	Conducting litigation and legal follow-up processes	
	Managing customer complaints	
	Managing the Bank's/Institution's operational risks	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Analysing suitability of business processes and their productivity	
	Conducting accountancy and invoice transactions	
	Setting Up and Management of the IT and infrastructure	
	Ensuring the security of physical data	
	Relationship management of support service providers, business partners or suppliers	
	Ensuring accuracy and up to dateness of the data	
	Conducting payment service activities	
	Managing customer complains	
	Ensuring the accessibility of the Bank's / Institution's services	
	Sustainability and Activities on Sustainability	

Versiyon No V1.2024.08.24

Model No 19.PAZ.FR.3928.01

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Customers' Financial Transaction Data Card Payment Data Audio and Visual Records Digital Activity Data Data on Transaction Security and Cyber Security of the Institution Data on Request / Complaint and Reputation Management	Conducting litigation and legal follow-up processes	Data processing is necessary for the establishment, exercise or protection of any right (Article 5.2 (e) of the Data Protection Law)
	Managing customer complaints	
	Managing customer relations	
Identity Data Contact Data Legal Transaction Data Economic and Financial Data Data on Facilities Physical Security Data on Education, Work and Professional Life Customers' Financial Transaction Data Data on Risk Management and Financial Security Reference Identifiers Families and Relatives Audio and Visual Records Data on Transaction Security and Cyber Security of the Institution Digital Activity Data Legal Transaction Data Data on Request / Complaint and Reputation Management Location Data	Designing the strategy of the Bank/Institution	Data processing is necessary for the legitimate interests pursued by the data controller (Article 5.2 (f) of the Data Protection Law)
	Analysing the Bank's/Institutions systems and their development	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Event management of the Bank for third parties outside the Institution	
	Conducting audit activities	
	Ensuring accuracy and up to dateness of the data	
	Designing operational activities	
	Managing activities aiming for customer satisfaction	
	Management of the Bank's / Institution's interest rate and interest rate risk	
	Managing the Bank's/Institution's operational risks	
	Sustainability and Activities on Sustainability	
	Management of the Bank's / Institution's liquidity and liquidity risk	
	Designing the Bank's / Institution's business processes	
	Analysing suitability of business processes and their productivity	

Categories of Processed Personal Data	Purpose of Process	Legal Reason
Identity Data Contact Data Economic and Financial Data Customers' Financial Transaction Data Digital Activity Data Card Payment Data Data on Education, Work and Professional Life Data on Risk Management and Financial Security Families and Relatives Location Data Audio and Visual Records Marketing Data	Conducting cross sale activities for products and services provided	Explicit consent of the data subject (Article 5.1 of the Data Protection Law)
	Determining products and services personalized for you	
	Conducting advertising, campaign and promotion activities in all mediums including digital channels and communicate with you within this respect	
	Conducting data analyse, modelling and scoring activities for marketing purposes	
	Establishing and increasing customer loyalty to product and services	
	Communicate with you in order to conduct a satisfaction and marketing survey on the products and services for marketing purposes	
Data on Criminal Convictions and Security Measures	Risk Management on compliance processes	Processing of Sensitive Data is stipulated under the relevant law (Article 6.3 of the Data Protection Law)
	Conducting litigation and legal follow-up processes	
	Setting up the required actions to conduct lawfully the Bank's / Institutions activities	
	Management of financial security processes (Know your customer, prevention of crime revenues, financing of terrorism and fraud and other illegal activities)	
	Conducting audit activities	



## 5. Transferring Your Personal Data to Third Parties and Purpose of Transfer

Your personal data processed by TEB and categories in the list above might be transferred to the below mentioned recipients for the mentioned purposes and for the legal reasons stipulated under Article 8 and 9 of the Data Protection Law.

Recipient	Purpose of Transfer
Public and Private Institutions authorised to receive information/documents and legal institutions (Banking Regulation and Supervision Agency, Capital Market Board, Central Bank of Turkey, Turkish Revenue Administration, Financial Crimes Investigation Board, Interbank Card Centre, Risk Centre of the Banks Association of Turkey, Courts, prosecution offices etc.)	Informing the authorised public and private institutions as per the applicable laws and regulations Setting up the required actions to conduct lawfully the Bank's/Institutions activities Ensuring the legal and physical security of the Bank Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Institutions providing external service or support service (any advisor, institution or party from whom TEB provides supplementary services or is collaboration for archive services, card/statement printing services, call centre, IT services, Bank's operational services, collection management, audit, rating services etc.)	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities Ensuring the legal and physical security of the bank Setting up the required actions to conduct lawfully the Bank's / Institutions activities Conducting marketing and cross sale activities
Business Partners (Institutions with whom a cooperation relation has been established for providing financial product and services) and TEB Group*	Conduct the required activities for the Bank's commercial activities Improve the Bank's reputation and business relations and determine the Bank's strategies Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conducting marketing and cross sale activities
Local and Foreign Banks and Financial Institutions, Contracted Merchants, Payment Service Providers, Other Financial Institutions which are members of a payment program, Institutions providing international card payment systems such as Mastercard Int. Inc. and Visa Inc. or local institutions providing card payment systems	Ensuring the customers benefit from the Bank's services Required in order to execute the transaction or fulfil the agreement Conduct the required activities for the Bank's commercial activities
Direct or Indirect Shareholders of TEB and BNP Paribas Group **	Disclosing information/documents to our main shareholder for the purposes of preparing a consolidated financial statement, risk management, internal audit and credit assessment to the extent permitted as per the applicable banking regulations Improve the Bank's reputation and business relations and determine the Bank's strategies
* 'TEB Group' Means a group of companies including TEB Holding A.Ş. and our bank and composed of affiliates. You may access to detailed information on such group of companies from <a href="https://www.teb.com.tr/about-teb/TEB-group">https://www.teb.com.tr/about-teb/TEB-group</a>	
** 'BNP Paribas Group' Means a group of companies composed of BNP Paribas S.A. and its affiliates	



## 6. Your Rights with Respect to Your Personal Data

You might exercise your below mentioned rights with respect to your personal data by contacting TEB as per article 11 of the Data Protection Law.

- To learn whether your personal data has been processed or not,
- If personal data has been processed, to request information on such personal data,
- To learn the purpose of processing your personal data and whether such personal data is used for intended purposes,
- To learn the third parties to whom your personal data is transferred in Turkey or abroad,
- To request the rectification of your incomplete or inaccurate data, if any and notify such rectification to third parties to which such personal data had been transferred,
- To request the erasure, destruction or anonymisation of your personal data if the legal reason for its processing no longer exists and request the notification of such erasure, destruction or anonymisation to third parties to which the relevant personal data had been transferred,
- To object to the processing of your personal data by automatic systems if such analysis leads to an unfavourable result for the data subject,
- To request compensation for your damage arising from the unlawful processing of your personal data.

You might exercise your above-mentioned rights by filling out the application form published under <https://www.teb.com.tr/pdp> or available in our Bank's branches and deliver it to the Bank through any mean listed in below.

You might fill in the form and;

- Deliver it in written form to our branches,
- Send it to our Bank's address via return receipt registered mail or through notary public
- To [kvkkbasvuru@teb.com.tr](mailto:kvkkbasvuru@teb.com.tr) e-mail address via your e-mail previously notified to our Bank or by signing the relevant form with secure electronic signature.
- With Registered Electronic Mail (KEP) from your Registered Electronic Mail account to [turkekonombankasi@hs03.kep.tr](mailto:turkekonombankasi@hs03.kep.tr) address.

Also, you might transmit your request through any other method stipulated under the Communiqué on the Procedure and Principles on the Application to the Data Controller.

Our Bank would respond to your request free of charge as soon as possible following the receipt thereof and within thirty days at the latest. In principle, your application is processed free of charge. However, if the response requires any cost, fees might be charged in accordance with the tariff set by the Personal Data Protection Board.

During the preparation of a response to your query, our Bank might request from you any additional document and information for the verification of your identity and clarify your request. If case, you would not share the relevant information and documents your application our Bank reserves the right not to respond to your query due to ensuring the security of your data.