



TEB
BNP PARIBAS ORTAKLIĐI

TÜRK EKONOMİ BANKASI
ANONİM ŐİRKETİ

PERSONAL DATA PROCESSING AND
PROTECTION POLICY

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TÜRK EKONOMİ BANKASI A.Ş.

PERSONAL DATA PROCESSING AND PROTECTION POLICY

INFORMATION FORM

Document Name: Türk Ekonomi Bankası A.Ş. Personal Data Processing and Protection Policy

Target Audience: Data subjects other than the employees of Türk Ekonomi Bankası A.Ş., whose personal data are processed by Türk Ekonomi Bankası A.Ş.

Prepared by: Türk Ekonomi Bankası A.Ş. Personal Data Coordination Unit

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In case of inconsistency between the Turkish version of This Türk Ekonomi Bankası A.Ş. Personal Data Processing and Protection Policy and its translation in any language, the Turkish text should be taken as the basis.

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INTRODUCTION

The right to protection of personal data is one of the fundamental individual rights and freedoms. Such right is subject to protection under article 20 of the Turkish Constitution and article 8 of the European Convention on Human Rights. Personal Data Protection Law No.6698 was also published in the Official Gazette on 7 April 2016 in order to protect fundamental rights and freedoms of individuals.

1. PURPOSE AND SCOPE

Türk Ekonomi Bankası (TEB) A. Ş. Personal Data Processing and Protection Policy is prepared with the main purpose of ensuring transparency and accountability pursuant to personal data protection legislation. This policy aims at informing and enlightening the individuals, whose personal data are processed by TEB A.Ş.

All natural persons, whose personal data are processed by our bank, are within the scope of TEB A. Ş. Personal Data Processing and Protection Policy. There is, on the other hand, a separate personal data processing and protection policy pertaining to the employees of TEB A. Ş. This policy shall apply to any issues that have not been addressed in the above mentioned special policy.

2. DEFINITIONS

Definitions used in this Policy, which require description for the sake of documentation integrity, are as follows:

- **Explicit consent:** Freely given, specific and informed consent.
- **Relevant user:** Person, processing the personal data pursuant to the authority and instructions given by the data controller or within the data controller organization, except the person/unit responsible of the technical storage, protection and backup of the data.
- **Anonymizing personal data:** Rendering personal data impossible to link with an identified or identifiable natural person, even though matching them with any other data.
- **Personal Data:** Any and all kind of information relating to an identified or identifiable natural person.
- **Processing of personal data:** any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof,

fully or partially through automatic means or provided that the process is a part of any data filing system, through non-automatic means.

- **Disposal of personal data:** Erasure, destruction or anonymizing of personal data.
- **Erasure of personal data:** Making the personal data by no means inaccessible and unavailable for the relevant users.
- **Destruction of personal data:** Making the personal data by no means inaccessible, unrecoverable and non-reusable by anybody.
- **The Authority:** Personal Data Protection Authority or its Board.
- **PDP Law:** Turkish Personal Data Protection Law numbered 6698.
- **Special Categories of Personal Data:** Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures and the biometric and genetic data.
- **Policy:** Türk Ekonomi Bankası A.Ş. Personal Data Processing and Protection Policy.
- **TEB:** Türk Ekonomi Bankası A.Ş.
- **Processor:** The natural or legal person who processes personal data on behalf of the controller upon his authorization.
- **Data filing system:** The filing system which the personal data are filed into through being structured according to certain criteria.
- **Data subject or relevant person:** The natural person, whose personal data are processed.
- **Data controller:** The natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data filing system.

3. IDENTITY OF THE DATA CONTROLLER

Information relating to the data controller for all kinds of personal data processing operation, which falls within the scope of this policy, is provided below.

Data Controller: Türk Ekonomi Bankası A. Ş. (TEB)

Commercial Registry No: 189356, Mersis No: 0876004342000105

Address: TEB Kampüs C ve D Blok Saray Mah. Sokullu Cad. 7A – 7B, 34768 Umraniye/Istanbul

4. GENERAL PRINCIPLES ON PROCESSING OF PERSONAL DATA

Article 4 of PDP Law lists the general principles required to be complied for processing of personal data. Such principles are considered and precisely implemented within the scope of all data processing operations performed by TEB. These mentioned principles and explanations relating thereto are set out below:

- **Lawfulness and conformity with the rule of bona fides:** While fulfilling its obligation of processing and protection of personal data, TEB acts in compliance with the general principles of law and the rule of bona fides set forth under Turkish Civil Code.
- **Ensuring that the personal data are accurate and up to date:** It is of importance for the protection of individual rights that the personal data reflects accurate and up to date information relating to individuals. TEB shows the reasonable care expected from it for ensuring that the personal data being processed by it is accurate and up to date.
- **Processing personal data for specific, explicit and legitimate purposes:** Purposes targeted for processing of personal data is the key criteria for determining if the processing of personal data is lawful or not. In this context, PDP Law requires processing of personal data for specific, explicit and legitimate purposes. Therefore, TEB carries out processing of personal data for specific, explicit and legitimate purposes required by business operations in accordance with this principle.
- **Being relevant with, limited to and proportionate to the purposes for which they are processed:** TEB processes the personal data to the extent required to achieve the purposes determined by its business operations. TEB also acts in compliance with the principles of being limited to and proportionate by avoiding any processing of unnecessary personal data.
- **Retaining for a period of time specified by relevant legislation or required for the purpose for which they are processed:** Personal data processed by TEB is retained for a period until the purposes, which could be deemed within the scope of conditions for processing personal data, are removed. When these purposes are removed; TEB shall cease to retain the relevant personal data.

5. CONDITIONS FOR PROCESSING PERSONAL DATA

PDP Law sets forth the conditions for processing personal data under article 5. If any purpose of processing personal data by the data controller falls under the conditions listed in PDP Law, such data controller shall be entitled to process personal data lawfully. Within this context, to the extent the purpose of processing personal data by TEB fall under the conditions listed in PDP Law, TEB shall perform such processing of personal data. TEB does not perform any processing, which is not within the scope of such conditions for processing personal data.

Conditions for personal data processing set forth under PDP Law are as follows:

- Explicit consent of the data subject,
- It is clearly provided for by the laws,
- It is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid,
- Processing of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfilment of that contract,
- It is mandatory for the controller to be able to perform his legal obligations,
- The data concerned is made available to the public by the data subject himself,
- Data processing is mandatory for the establishment, exercise or protection of any right,
- It is mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

It is possible that one or more conditions for processing personal data, which make processing of personal data lawful, shall apply at the same time.

6. CONDITIONS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

TEB is entitled to process special categories of personal data provided that the conditions set forth under article 6 of the PDP Law are met. Special categories of personal data are not processed with any purpose that may result in discrimination among individuals or in a way that the individual is exposed to illegitimate treatment. Besides, additional security measures, as specified by the

relevant legislation, are taken by TEB in order to ensure security of the special categories of personal data.

Conditions for processing special categories of personal data, which are set forth under article 6 of the PDP Law, are as follows:

- Explicit consent of the owner of special categories of personal data,
- The cases provided for by laws for personal data, excluding those relating to health and sexual life,
- For personal data relating to health and sexual life, only by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services , planning and management of health-care services as well as their financing.

7. INFORMATION RELATING TO PROCESSING OF PERSONAL DATA

Personal data processing operations performed by TEB are analyzed in detail and planned with an integrated approach for a period from personal data entering into the domination of TEB, being a legal entity, until disposal of such data. All measures required for a personal data to be processed in compliance with conditions for processing personal data are taken in the course of personal data processing operations.

Personal data are collected by TEB from different channels. Collected personal data and data subjects/relevant persons, whose personal data are processed by TEB, are separately classified. Likewise, TEB's purposes of personal data processing are assorted under classifications. TEB's personal data processing operations are based on such three main classifications (categories of personal data, categories of data subjects and purposes of data processing) and monitored pursuant to an inventory prepared in compliance with the relevant legislation. Detailed information relating to such matters is provided under relevant headings below.

7.1. Data Collection Channels

Data collection channels of TEB, which is carrying out banking activities, are listed below:

- TEB Branches
- Online Banking and Mobile Banking

- tebkariyer.com and other TEB Websites
- ATM
- TEB Call Centre and Other Communications Through Phone
- Distributor and Sales Offices
- Chambers of Trade and Artisans and Similar Union and Associations
- Active Sales Operations
- Self Service Unit with Assistance Support
- CCTV (Closed Circuit Camera System Records)
- SMS/E-Mail
- Cookie and Similar Tracking Technologies
- Fax
- Mail, Cargo or Courier Services
- Other Physical or Electronic Media

Based on the technological progress, TEB may include new channels to the above listed personal data collection channels or cease to use some of the existing channels. In such cases, via updating the Policy shall be ensured in order to maintain transparency and accountability and thus accurate statement of the channels being used.

7.2. Categories of Personal Data

Categorization of personal data is an absolute requirement for compliance to the legislation relating to personal data. TEB classifies the personal data it processes under two main categories, as personal data and special categories of personal data. Further classification is made under the above mentioned classifications based on the types of data.

Categorization of TEB relating to personal data and special categories of personal data are provided in the below table:

CATEGORIES OF PERSONAL DATA	EXPLANATION
Identity Data	Personal data of natural persons relating to their identity information shall be considered under this classification.
Communication Data	All kinds of personal data to be used for communication with individuals shall be considered under this classification.
Family Data	Information relating to individuals' family and relatives shall be assorted under this classification. Relevant person's being a customer, employee or a person, who belongs to another data subject classification, does not matter.
Educational, Job and Professional Life Data	All kinds of information relating to individuals' education and professional life shall be assorted under this classification.
Data Relating to Financial Products, Assets and Financial Position	All kinds of information relating to individuals' finance and assets, the financial products they use and updated financial positions shall be assorted under this classification.
Data Relating to Financial Transactions	All kinds of records relating to financial transactions performed by the individuals at the bank shall be assorted under this classification.
Data Relating to Risk Management and Financial Security	All kinds of information to be used for ensuring bank's financial security and within the scope of risk management activities, such as KYC (Know Your Customer), AML (Anti-Money Laundering) and Antifraud, as a part of risk management processes, shall be assorted under this classification.
Marketing Data	All kinds of personal data to be used for marketing activities for individuals and which may serve to the purpose for marketing of the bank's products and services shall be assorted under this classification.
Digital Media Usage Data	All kinds of personal data collected as a result of monitoring users' activities in digital media shall be assorted under this classification.
Location Data	Location and location information obtained by other similar tracking methods shall be assorted under this classification.
Data Relating to Security of the Bank's Premises	All personal data collected within the scope of activities for ensuring physical security of the Bank's premises shall be assorted under this classification.
Data Relating to Transaction Security and Cyber Security of the Bank	All kinds of personal data useful within the scope of ensuring transaction security, information and cyber security of the Bank shall be assorted under this classification.

Claim/Complaint and Reputation Management Data	Types of personal data, which may be processed within the scope of claim/complaint and reputation management processes, vary by nature of the relevant case. Therefore, all kinds of personal data available for use within such scope shall be assorted under this classification.
Legal Transaction Data	Legal transaction data such as information in correspondence with judicial authorities, information in the case file shall be assorted under this classification.
Intellectual Property Data	All kinds of personal data relating to intellectual property products and applications made in order to protect such products shall be assorted under this classification.
Visual and Audio Records	Audio-visual recordings such as audio recordings, event videos and photos, call center call recordings, etc. (excluding camera recordings recorded for physical security reasons) shall be assorted under this classification.
Employee Data	All kinds of personal data relating to the employees and which are processed in accordance with the employment agreement shall be assorted under this classification.
Employee Candidate Data	Personal data of all individuals, who has contacted with TEB in any way as an employee candidate, shall be assorted under this classification, regardless of execution of an employment agreement later on. Even there is no active application, if the person opens his resume to access generally; such processing shall be assorted under this classification.
SPECIAL CATEGORIES FOR PERSONAL DATA	EXPLANATION
Health Data	All kinds of personal data relating to the health and health conditions of individuals shall be assorted under this classification.
Biometric Data	Biometric Data Types shall be assorted under this classification.
Membership to associations, foundations, trade-unions	Information regarding membership to associations, foundations, trade-unions shall be assorted under this classification.
Data relating to criminal convictions or offences	Data relating to criminal convictions or offences shall be assorted under this classification.
Other special categories of data	We try not to process other special categories of data listed in the Law No. 6698, such as Philosophical Belief, Religion, Sect and Other Beliefs, Dress and Dress etc.

Some of your personal data are under more stringent protection, and this data has been classified as "special categories of personal data" and has been listed in the Personal Data Protection Law. We try not to process your personal data of special nature in the activities carried out by our bank.

However, in some cases, for example, your religion and blood type information obtained within the scope of mandatory ID card photocopying; If you choose to use a voice signature or fingerprint for authentication in mobile application or call center channels, give your biometric data; information about your conviction within the scope of our legal obligations; If you request that the association does not pay the union membership fees/subscriptions, your special data showing that you are a member of these institutions; information about your disability, which is necessary for the performance of our service obligations towards our disabled customers; such as information about your health that you transmit in order to carry out your insurance transactions as an insurance agent.

During the processes where it is obligatory to have a photocopy of your ID card, the Bank does not process and add blood type and religion information stated in the ID card in the system. It is included in the system only because of the copy of the identity document. We diligently carry out the necessary technical work to delete this information in our systems.

7.3. Categories of Data Subject

Data subjects, i.e. relevant persons- whose personal data is processed-, constitute the focus of this policy and thus TEB’s personal data processing activities. The classification allows more effective protection for the rights of data subjects and effective communication with the data subjects. Categorization of TEB relating to data subjects are provided in the below table:

CATEGORIES OF DATA SUBJECT	EXPLANATION
Customer	Means persons or institutions or persons relevant thereto, who benefit from any product or service of TEB.
Potential Customer	Means persons or institutions or persons relevant thereto, who wish to benefit from any product or service of TEB or to whom TEB wishes to offer its product or service.
Persons in Credit and Risk Management Processes	Means persons included in the risk group within the scope of the Banking Legislation and persons associated with TEB's credit and risk management processes, such as the Guarantors and the persons giving collaterals.
Supplier	Means persons or institutions or persons relevant thereto, who provide product or service to TEB.
Business Partner	Means persons or institutions or persons relevant thereto, with whom TEB works in cooperation.

Consultant	Means persons or institutions or persons relevant thereto, who provide external consultancy to TEB.
Supplier of Support Services	Means persons or institutions or persons relevant thereto, who provide services that are extension of or complementary to main banking services.
Bank's Shareholder	Means persons, institutions or persons relevant thereto within the shareholding structure of TEB.
Employee	Persons, who are accepted by TEB as employees within the scope of working relationship.
Employee Candidate	Persons, who have made job applications for purposes of working in our bank.
Others	Means persons or institutions or persons relevant thereto, apart from the above listed ones, who have been in a continuous or non-recurring, direct or indirect relationship with TEB.

7.4. Purposes of Processing Personal Data

Purposes of Processing Personal Data are of great importance in order to determine which conditions for personal data processing to be applicable to the actual data processing operation. For instance, a purpose of processing data may require obtaining explicit consent, which is one of the conditions for data processing, while another purpose of processing data may only require fulfilment of obligation to supply information in order to ensure performance of processing operations, without seeking for an explicit consent due to the existence of one or more other conditions for data processing.

Purposes of processing personal data are classified by TEB in order to ensure transparency and accountability. All classifications are also split into sub- classifications in order to provide more detailed and accurate information to data subjects. Detailed purposes under such sub- classification are included in the information documents provided to data subjects. It is hereby ensured that the data subjects are clearly informed of TEB's data processing purposes.

TEB's data processing purposes are listed below for information purposes:

- Carrying out required operations in order to sustain commercial activities of the Bank,
 - Forming business processes of the Bank

- Management of information security
- Setting up and management of information technologies infrastructure
- Carrying out construction works
- Analyzing sufficiency and efficiency of the business processes
- Corporate communications activities
- Carrying out logistic operations
- Analysis and improvement of banking systems
- Accounting and invoicing operations
- Building up operational activities
- Activities relating to sustainability and continuity
- Arranging authorization of third parties for their access to the bank's data system
- Leveraging reputation and business relations of the Bank as well as determination of its strategies,
 - Management of events towards people who are not related to the Bank
 - Forming strategies for the Bank
 - Management of relations with BNP Paribas
 - Management of relations with support services providers, business partners or suppliers
 - Carrying out social responsibility projects
- Providing that the customers benefit from services of the Bank,
 - Carrying out sales process for banking services
 - Carrying out private pension services
 - Forming and maintaining credit extension processes
 - Management of credit payment processes
 - Carrying out customer services processes
 - Management of customer relations
 - Management of customer complaints
 - Management of insurance services
 - Carrying out POS processes
 - Carrying out processes relating to payment services
 - Ensuring accessibility of banking services
 - Following up contract processes
- Marketing activities,
 - Marketing services of the Bank

- Management of activities oriented to customer satisfaction
- Establishing and increasing loyalty of customers towards banking services
- Performing cross selling between products offered by the Bank
- Conducting market research activities
- Ensuring legal and physical security of the Bank,
 - Management of emergency and disasters
 - Ensuring security of the Bank's inventories and sources
 - Establishing actions required for activities of the Bank to be carried out in compliance the applicable legislation
 - Management operational risks of the Bank
 - Physical security of the Bank's facilities
 - Litigation and legal follow up processes
 - Carrying out audit activities
 - Management of financial security processes (Such as Know Your Customer (KYC), Anti-Money Laundering (AML), Anti-Fraud and combating with other unlawful transactions)
 - Carrying out identification activities
 - Management of relations with shareholders
 - Carrying out occupational safety processes
 - Risk management relating to credit processes
 - Ensuring currency and accuracy of the existing data
 - Performance of transactions required in accordance with the corporate law
 - Providing information to authorized public and private institutions in accordance with the legislation
 - Management of visitor records
- Human resources management.
 - Performing orientation and training activities in the Bank
 - Making promotion, assignment and position changes in the Bank
 - Management of employee remunerations
 - Providing side rights and benefits to the employees
 - Management of events for employees
 - Carrying out social contribution activities towards employees
 - Management of employees' access authorizations
 - Following up transactions and tracks of employees

- Performing exit (end-of-service) operations of the employees
- Creating and evaluating employee satisfaction and loyalty
- Fulfilling legal obligations set forth under the employment contract
- Management of HR call center processes
- Carrying out recruitment processes
- Performing career and talent management activities
- Performance management
- Management of obtaining residence and work permits of foreign employees
- Evaluating suggestions of employees towards improvement of the banking processes
- Trainee recruitment processes
- Satisfying employee demands
- Creating organizational structure and ensuring continuity thereof

Main purposes listed above may differ based on evolution of TEB's personal data processing operations. Data subjects shall also be informed of new purposes subject to update of the policy.

8. RETENTION AND DISPOSAL OF PERSONAL DATA

Personal data are of great importance in terms of banking activities. A bank's possessing sufficient information particularly relating to its customers as well as all individuals, with whom the bank communicates, ensures not only protection of the rights of relevant individual but also economic security of the country. Being fully aware of that, TEB retains personal data of the data subjects, of whose personal data it processes, in electronic and physical media by taking necessary technical and administrative security measures.

The period for retention of personal data by TEB is calculated in consideration of the periods prescribed under banking and other relevant legislation. As long as a purpose of processing personal data, which meets any of the conditions for processing of personal data as set forth under PDP Law, exist; processing and retention of individuals' personal data shall be carried on, despite expiry of such prescribed periods.

Personal data shall be disposed by TEB upon disappearance of purposes which require personal data processing that could remove the existence of conditions for personal data processing as set forth under PDP Law. Such disposal shall be semi-annually carried out on Bank's own initiative

in accordance with the provisions of relevant legislation or if required upon demand by the data subjects.

Erasure of personal data by TEB is carried out using deletion, anonymization or destruction techniques based on the media where personal data are stored. Detailed information on such techniques is provided in the [Guidelines on the Erasure, Destruction or Anonymization of Personal Data](#) published by the Authority.

TEB stores the personal data it processes in physical and electronic media in order to carry out its banking services. Within the scope of its commercial activities, TEB at all time complies with the retention period and its obligations under the PDP Law and banking legislation relating to protection of personal data and erases or anonymizes the personal data on Bank's own initiative in accordance with article 7 of the Policy or upon demand by the data subject, except for the retention periods prescribed by the legislation. In case of deletion, destruction or anonymization of personal data, these data will in no way make the data subject specific or identifiable..

9. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Transfer of personal data by TEB to third parties either at home or abroad is possible due to requirement of banking activities. In order to carry out such transfer, TEB shows utmost care to the requirements of PDP Law as well as existence of purposes that meet data processing conditions. Besides in the course of data transfer, TEB takes all technical and administrative security measures necessary in order to meet appropriate level of security measures required by the legislation.

Türk Ekonomi Bankası A.Ş., as an esteemed member of BNP Paribas group, shows the utmost care relating to protection of personal data, with a responsibility that is invested by being part of a global finance institution.

Parties, to whom personal data are transferred, are classified in below categories in order for TEB to monitor transfers of personal data:

PARTIES TO WHOM TRANSFER IS MADE	SAMPLES OF SHARING PURPOSE
Legally Authorized Public/Private Institution or Organization	Data may be shared with the public institutions and organizations such as Banking Regulation and Supervision Agency, Capital Markets Board of Turkey, Financial Crimes

	Investigation Board, Central Bank of the Republic of Turkey.
TEB Group	Data may be shared in order to conduct business activities that require TEB Group companies' participation.
Direct or Indirect Shareholder	Data may be shared with the shareholders of the Bank according to the provisions of the relevant legislation.
BNP Paribas Group	Data may be shared in accordance with the Article 73 of the Banking Law.
Supplier of Support Services	According to the provisions of the relevant legislation, data may be shared with the companies that provide support services to the Bank such as card and statement printing and distribution, limited with the purposes of their activities.
Supplier/Business Partner/Consultant	Data may be shared with the consultants, institutions and parties which the Bank receives the services in a complementary nature of the Bank's activities, and which the Bank works in cooperation with, limited with the purposes of their activities.
Insurance Companies	Data may be shared with insurance companies in order to carry out the activities of the Bank under its title as an agency.
Foreign/International Public/Private Institutions and Organizations	Data may be shared with institutions of international payment systems, such as MasterCard and Visa, limited with the purposes of their activities.
Risk Centre of The Banks Association of Turkey	Data may be shared with the Risk Center established in the presence of The Banks Association of Turkey, in accordance with the relevant legislation.
Other Persons	Except the above-mentioned issues, the persons to whom your data can be transferred are considered under this classification.

10.OBLIGATION TO SUPPLY INFORMATION

Pursuant to article 10 of the PDP Law, TEB shall fulfil its obligation to supply information as set forth under the PDP Law by providing below information to relevant data subjects at the time of personal data collection:

- The identity of the data controller and of his representative, if any,
- The purpose of data processing,

- To whom and for what purposes the processed data may be transferred,
- The method and legal reason of collection of personal data,
- Other rights referred to in article 11 herein.

In order to fulfil its obligation to supply information, TEB prepares sufficient informative documents to use them at the time of first contact with data subjects in the course of performing its banking activities and gives such documents to data subjects. Besides, this policy also serves for the fulfilment of obligation to supply information.

Nevertheless, TEB is exempt from its obligation to supply information for the following cases pursuant to article 28 of the PDP Law:

- Where personal data processing is required for the prevention of a crime or crime investigation,
- Where personal data processing is carried out on the data which is made public by the data subject himself,
- Where personal data processing is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations having the status of public institution, assigned and authorized for such actions, in accordance with the power conferred on them by the law,
- Where personal data processing is required for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.

11. THE RIGHTS OF DATA SUBJECT

The rights granted to data subjects pursuant to article 11 of the PDP Law are listed below:

- To learn whether his personal data are processed or not,
- To request information if his personal data are processed,
- To learn the purposes of his data processing and whether this data is used for intended purposes,
- To know the third parties to whom his personal data are transferred at home or abroad,
- To request the rectification of the incomplete or inaccurate data, if any,

- To request the erasure or destruction of his personal data upon disappearance of reasons which require processing of personal data that have been processed in compliance with PDP Law and related provisions of other laws and to request notification of the operations carried out in this context to third parties to whom his personal data has been transferred,
- To object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavorable consequence for him,
- To request compensation for the damages arising out of the unlawful processing of his personal data.

TEB takes all technical and administrative measures required by the legislation in order to ensure that the rights granted to data subjects by the PDP Law are freely used by any data subject. Data subjects are entitled to use their above listed rights by filling the [application form](#) published on <https://www.teb.com.tr/privacy-policy/> or obtaining the form from TEB branches and submitting it through the ways listed below.

Form must be filled completely and:

- May be delivered by hand and in writing to our Branches,
- May be sent to our Bank address via registered mail with return receipt or notary public,
- May be sent via an e-mail message to kvkkbasvuru@teb.com.tr with a secure electronic signature,
- May be sent through a Registered E-Mail (KEP) account via KEP to turkekonomibankasi@hs03.kep.tr.

In addition, you can send your petition in written stating your request clearly to our branches or via your e-mail address that you have previously notified to our bank and registered in our systems, or by another method included in the Communiqué on Application Procedures and Principles to the Data Controller published by the Data Protection Authority.

TEB shall conclude your requests regarding your rights listed above free of charge as soon as possible and within thirty days at the latest after the transmission date. If the transaction also requires a cost, you may be charged a fee based on the tariffs published by the Data Protection Authority.

Additional information and documentation may be requested by TEB in order to verify identity of the applicant as well as to clarify demand of the applicant for the purpose of responding to

applications submitted by data subjects. In case of failure to provide such information and documentation, application of the data subject may not be responded.

12. MEASURES RELATING TO PERSONAL DATA SECURITY

TEB, having the sense of responsibility of a bank, shows all kinds of reasonable attention and care for ensuring confidentiality and security of personal data it processes. TEB also takes all kinds of technical and administrative measures within a reasonable level to ensure confidentiality and security of data required in accordance with the provisions of banking legislation as well as article 12 of the PDP Law. Prevention of unlawful processing of personal data, prevention of unlawful access to personal data as well as retention of personal data in sufficient security level are targeted through such administrative and technical security measures.

In case of processing of personal data by a natural or legal person (data processor) on behalf of itself, TEB shall ensure that the above mentioned measures will also be taken by such data processors.

In case personal data are collected by third parties through unlawful methods, TEB shall notify the data subjects, the Authority as well as other relevant public institutions and organizations in accordance with the provisions of legislation.

While implementing the measures regarding personal data security, the [Guideline on Personal Data Security \(Technical and Administrative Measures\)](#) published by the Authority is being into consideration.

13. OTHER PROVISIONS

In case of inconsistency between this Policy and other TEB policies, TEB shall provide harmonization between both policies in consideration of PDP Law and secondary legislation. In case of an inconsistency between the Policy and the legislation, relevant legislation shall prevail.

This policy becomes effective on the date it is published. The Policy may be updated in the future upon changing conditions and needs.

Any and all queries related to his policy can be communicated to kvkkbasvuru@teb.com.tr.