

**YAPI KREDİ FAKTORİNG A.Ş.**

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

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## 1. INTRODUCTION

As is known, the European Union (“EU”) has made arrangements on the protection of personal data, and the member states have been imposed obligations to comply with such arrangements and principles. In our country, arrangements concerning protection of personal data have been made by the Grand National Assembly of Turkey (“GNAT”) in accordance with European Union harmonization criteria.

The main purpose of the Law on the Protection of Personal Data No 6698 (“Law”) announced in The Official Gazette in April 2016 is to protect the fundamental rights and freedoms of people, particularly the right to privacy in processing of the personal data.

Our Company gives the utmost importance to fundamental rights and freedoms of persons and has exercised due diligence to ensure processing of all personal data of the natural persons involved with our Company, including those who use our products and services, in accordance with the Law and privacy and safety of such data.

## 2. PURPOSE AND SCOPE

The Law protects the fundamental rights and freedoms of persons, in particular their rights to privacy, with respect to the procession of personal data, and sets forth the obligations of, and the principles and procedures to be followed by, natural and legal persons who process personal data.

The purpose of the Yapı Kredi Faktoring A.Ş. (“**Company**”) Corporate Policy on Protection and Processing of Personal Data (“**Policy**”), which has been prepared taking into consideration the said regulation, is to ensure the compliance with obligations concerning protection of personal data, to assess the processing of information obtained within the activities carried out by the Bank through a risk-based approach, to determine strategies, internal control and measures, operational rules and responsibilities related to protection of privacy and to raise awareness of the personal data subjects and employees of the Company regarding these matters. Policy

Accordingly, this Policy governs the protection and processing of the personal data of our customers and prospective customers, officials and shareholders of our customers, natural person guarantors, employee candidates and trainees, prospective business partners, employees, shareholders and officials of our business partners, prospective subcontractors/suppliers/support service companies, employees, shareholders and officials of our subcontractors/suppliers/support service companies, participants in the campaigns/competitions, our visitors, members of the press, family members and relatives of the data subjects and other third parties.

All activities to be carried out by our Company regarding protection of personal data of our employees are managed under the Policy for Protection and Processing of the Personal Data of the Yapı Kredi Faktoring A.Ş. Employees, which is prepared in line with the principles of this Policy.

All activities to be carried out by the Company and all measures to be taken under this Policy shall be determined by the relevant procedures. Preparation, amendments to be made in accordance with the conditions, and implementation of the said procedures shall be under the authority and responsibility of the unit to be authorized by General Directorate. All Company employees shall be obliged to comply with this Policy and all relevant laws and regulations while performing their duties.

Failure to comply with this Policy or any violation of this Policy in any way whatsoever may result in disciplinary measures up to and including termination of employment contract.

## 3. DEFINITIONS

Unless otherwise required by the content in this Policy,

“ <b>Explicit Consent</b> ”	Means freely given and informed consent for a specific matter,
“ <b>Constitution</b> ”	Means the Constitution of the Republic of Turkey,
“ <b>Company</b> ”	Yapı Kredi Faktoring A.Ş.
“ <b>Personal Data</b> ”	Means any information relating to an identified or identifiable natural person (e.g. name & surname, Turkish Identity Number, e-mail, address, birth date, credit card number, bank account number – <i>Therefore, processing of data relating to legal persons is not</i>

*within the scope of the Law),*

<b>“Personal Data Subject”</b>	Means the natural person whose data is processed,
<b>“Processing of Personal Data”</b>	Means 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 registry system, through non-automatic means.
<b>“Personal Data of Special Nature”</b>	Means the 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.
<b>“Data Controller”</b>	Means the natural or legal person who determines the purpose and means of processing personal data and is responsible for managing the place where the data is stored systematically. (data registry system).

#### **4. MATTERS CONCERNING PROCESSING OF PERSONAL DATA**

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

Our Company processes the data in accordance with the provisions of the legislation that bind our Company within the scope of its operations, particularly the Constitution, the Law, the Finance Lease, Factoring and Financing Companies Law No 6361. Accordingly, the following principles are taken into consideration:

###### **4.1.1. Being Compatible with Law and Good Faith**

Our Company, as a prudent merchant, acts in accordance with the principles set forth by legal regulations and the rule of law and integrity in processing of personal data.

###### **4.1.2. Ensuring to Keep the Personal Data Accurate, and when necessary, Up To Date**

Our Company ensures that personal data it processed by taking into account the fundamental rights of personal data subjects and its own legitimate interests within the scope of Law on the Protection of Personal Data and the provisions of other laws and regulations that it is obliged to comply with within the scope of its operations is accurate and up-to-date.

###### **4.1.3. Processing for Specific, Explicit and Legitimate Purposes**

Our Company explicitly and precisely defines the legitimate and lawful purpose of processing personal data. Within this scope, the personal data is processed to the extent limited by the products and/or services provided or to be provided and the legal obligations. In this context, the purposes the personal data will be processed for are set forth prior to start of processing the personal data.

###### **4.1.4. Being Relevant, Limited and Proportionate to the Processing Purposes**

Our Company processes the personal data in such a way that allows achieving specified purposes and avoids processing of personal data which is not relevant or required for achieving the said purposes. In this regard, the processing of personal data shall be limited with the activities and legal obligations.

###### **4.1.5. Retention Only for the Length of Time Stipulated by the Relevant Legislation or for the Processing Purpose**

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

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

The protection of personal data is secured as a fundamental human right and regulation of the details are stipulated with an amendment in article 20 the Constitution. Accordingly, protection of personal data is a Constitutional right. The fundamental rights and freedoms may be restricted only by law and in conformity with the reasons mentioned in the relevant articles of the Constitution without infringing upon their essence. Our Company processes personal data only after obtaining explicit consent of the data subject in accordance with the Constitution and the Law or for purposes and conditions of personal data processing conditions set forth in paragraph 2 of article 5 and paragraph 3 of article 6 of the Law.

Therefore, explicit consent of the personal data subject is only one of the legal bases making processing of personal data in line with the law. The basis for the processing personal data may be only one of the following conditions, or more than one of the following conditions can be also the basis for the processing of the same personal data.

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

One of the conditions for the processing the personal data is explicit consent of the data subject. The explicit consent of the personal data subject must be given in relation to a specific issue, based on information and declared by free will.

#### **4.2.2. Cases where Personal Data can be Processed without Seeking the Explicit Consent**

##### 4.2.2.1. Where It Is Expressly Permitted by the Laws

Personal data of the data subjects can be processed lawfully without explicit consent where it is expressly permitted by the law.

##### 4.2.2.2. Where the Explicit Consent of the Data Subject cannot be Obtained due to Actual Impossibility

In cases where it is required to process the personal data of a person who is unable to declare his/her consent due to actual impossibility or not legally entitled to give consent in consideration of protecting the life and physical integrity of the relevant person or another person, the personal data of such data subject can be processed.

##### 4.2.2.3. Where Processing is Directly Related to Execution or Performance of a Contract

In cases where it is necessary to process the personal data of the contracting parties, provided that processing is directly relevant to execution or performance of a contract, the personal data can be processed.

##### 4.2.2.4. Legal Obligation

In cases where processing is required in order for our Company to perform its legal obligations, the personal data of the data subject can be processed.

##### 4.2.2.5. The Personal Data Subject Makes the Personal Data Available to the Public

In case the data subject makes his/her personal data available to the public, the related personal data can be processed.

##### 4.2.2.6. Where Data Processing is Required for Establishment or Protection of a Right

In cases where it is required to process the data for establishing, exercising or protecting a right, personal data of the data subject can be processed.

##### 4.2.2.7. Where Data Processing is Required for Legitimate Interests of the Company

In cases where it is mandatory to process the data for our Company's legitimate interests, personal data of the data subject can be processed provided that the fundamental rights and freedoms of the data subject are not violated.

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

The purposes of our Company to process the data

- I. Plan and execute the human resources policies and processes of our Company,
- II. Ensure legal or technical safety of our Company and the individuals who have business relationship with our Company and business continuity,

- III. Customize the products and services offered by the Company in accordance with liking, habits of use and needs of the personal data subjects and then plan and execute the necessary activities in order to propose and introduce such services and products to the personal data subjects,
- IV. Perform the necessary works and relevant business processes by our business units so that the products and services offered by the Company are used by the personal data subject,
- V. Perform the necessary works and relevant business processes by our business units so that our Company carries out the business and/or operational activities,
- VI. Plan and/or execute the commercial and/or business strategies of the Company

The detailed information under the said objectives are provided in APPENDIX 1: Purposes of Personal Data Processing of this Policy.

#### **4.3. Processing of Special Categories of Personal Data**

Our Company precisely complies with the regulations of the Law in processing of “special categories” of personal data defined by the Law.

Accordingly, some personal data that may have risks of causing victimization or discrimination of the persons when it is processed unlawfully is considered as “special categories” in article 6 of the Law. The special categories of personal data are processed in the following cases by our Company in accordance with the Law and on condition that adequate measures to be designated by the Board of the Protection of Personal Data (“PPD Board”) are taken:

- There is explicit consent of the data subject
- There is not explicit consent of the data subject
  - Special categories of personal data other than personal data relating to health and sexual life of the personal data subject can be processed when it is permitted under laws,
  - Special categories of personal data relating to health and sexual life of the personal data subject may only be processed for the purposes of public health, operation of preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by the persons under the confidentiality obligation or by the authorized institutions and organizations.

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

Provided that the relevant persons are informed in accordance with article 10 of the Law, personal data is processed based on data categories for lawful and legitimate purposes of personal data processing of our Company based on and limited by the one or more conditions for processing of personal data stated in articles 5 and 6 of the Law and in compliance with all principles and obligations notably the general principles regarding processing of personal data regulated by the Law.

The personal data categories covered by the scope of implementation of this Policy and the descriptions of the said categories are provided as follows:

<b>“Family Members”</b>	Means the family members and relatives of the data subjects
<b>“Press”</b>	Means the natural persons who work in the media organizations that our Company collaborates for any type press activities.
<b>“Employee Candidate”</b>	Means the natural persons who have applied to our Company for a job in any way or disclosed their personal background and related information to review of our Company
<b>“Shareholder”</b>	Means the natural persons who are shareholders of the legal entities that are customers of our Company.
<b>“Prospective Business Partner”</b>	Means the natural persons who work in the legal entity companies that our Company intends to establish cooperation, business partnership or program partnership with.
<b>“Employee of Business Partner”</b>	Means the natural persons who work in the legal entity companies that our Company has established cooperation, business partnership or program partnership with.

<b>“Shareholder of Business Partner”</b>	Means the natural person shareholders of the legal entity companies that our Company has established cooperation, business partnership or program partnership with.
<b>“Official of Business Partner”</b>	Means the natural persons who are authorized to legally represent the legal entity companies that our Company has established cooperation, business partnership or program partnership with.
<b>“Participant in Campaign/Competition”</b>	Means the natural persons who participate in the campaigns, drawing, competition and similar activities organized/to be organized by our Company or other entities acting on behalf of our Company.
<b>“Customer”</b>	Natural persons who currently use or have used the products and services rendered by our Company, regardless of whether they have any contractual relationship with our Company.
<b>“Potential Customer”</b>	Natural persons who have requested or been interested in using our products and services or who can be considered to be interested in the same in accordance with commercial practices and good faith
<b>“Candidate Apprentice”</b>	Means the natural persons who have applied to our Company for a trainee position in any way or disclosed their personal background and related information to review of our Company
<b>“Company Official/Representative/Officer”</b>	Means the natural persons who work as official, manager, member and/or chairman of the board of directors in the legal entities, public institutions, foundations, associations etc. which are customers of our Company.
<b>“Prospective Subcontractor/Supplier”</b>	Means the natural persons who work in the legal entities that our Company intends to establish subcontractor/supplier relationship with.
<b>“Employee of Subcontractor/Supplier”</b>	Means the natural persons who work in the legal entities that our Company has established subcontractor/supplier relationship with.
<b>“Shareholder of Subcontractor/Supplier”</b>	Means the natural persons who are shareholders of the legal entity customers that our Company has established subcontractor/supplier relationship with.
<b>“Official of Subcontractor/Supplier”</b>	Means the natural persons who are authorized to legally represent the legal entity customers that our Company has established subcontractor/supplier relationship with.
<b>“Guarantors”</b>	Means the third-party natural persons that our Company establishes relationship with in order to ensure security of the business and legal transactions between our Company and the customers and/or provide collateral for the loan debts of the customers.
<b>“Visitor”</b>	Means the natural persons who have accessed the physical premises belonging to our Company for various reasons or visited our web sites
<b>“3rd Person”</b>	Means the third-party natural persons who are related to the above-mentioned parties to provide the security of commercial transactions between them or to protect the rights of the mentioned parties and to provide advantage (e.g. other third persons who are party to payment transactions except the natural person customer) save the persons excluded from scope of this Policy and the Policy for Protection and Processing of the Personal Data of the Yapı Kredi Faktoring A.Ş. Employees.

The data subjects whose personal data have been processed by the Company are included in the above-mentioned scope, and those persons who are outside the scope of these categories may also direct their requests to the Company under the Law, and the requests of such persons will be taken into consideration under the Policy.

**In the light of the above-mentioned descriptions, the personal data categories and descriptions thereof are detailed in the below table.**

PERSONAL DATA CATEGORIZATION	DESCRIPTION OF PERSONAL DATA CATEGORIZATION
<b>Information of Family Members and Relatives of the Family</b> :	Information relating to the family members and relatives of the data subject that are processed for the purposes of protecting the legal interests of the Company and the data subject, such information which explicitly belongs to an identified or identifiable real person and are a part of the data filing system
<b>Candidate Employee/Apprentice Information</b> :	Personal data processed relating to the candidates who have applied to become an employee/apprentice in our Company or are deemed as candidate employee/trainee in line with the needs of the Human Resources of our Company as per the customs of trade and principles of good faith; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system.
<b>Supervision and Inspection Information</b> :	Personal data processed within the scope of compliance with the legal obligations of our Company and the Company policies, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Financial Information</b> :	Personal data processed with respect all information, document and records showing the financial outcome generated based on the nature of the legal relation established between our Company and the data subject; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Physical Premises Security Information</b> :	Personal data relating to the records and documents obtained when entering to physical premises and during the stay in such premises; such information which explicitly belongs to an identified or identifiable real person and are a part of the data filing system
<b>Legal Procedure and Compliance Information</b> :	Personal data processed for the purposes of determining and following up our legal receivables and rights and performance of our obligations and within the scope of compliance with our legal obligations and Company policies; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Contact Information</b> :	Information such as phone number, address, e-mail address and similar information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Process Security Information</b> :	Personal data processed for the purposes of ensuring technical, administrative, legal and commercial security of the Company and our employees during the conduct of commercial activities; such information which explicitly belongs to an identified or identifiable real person and are a part of the data filing system



<b>Reputation Management Information</b>	:	The information associated with person and collected for protecting commercial reputation of our Company (e.g. content shared in the social media against our Company, top executives and shareholders) and the relevant assessments reports generated, and the actions taken.
<b>Identity Information</b>	:	All information provided on the documents such as Driver's License, Identity Document, Residency Document, Passport, Advocate Identity, Marriage Records and similar certificates which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Location Data</b>	:	Information that shows the location of our customers and/or the employees of the institutions which we are in cooperation with while using their vehicles and/or tools of our Company; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Customer Information</b>	:	Information obtained and generated as a result of the operations conducted by our business units for our business operations; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Customer Process Information</b>	:	Information such as records of the use of our goods and services and instructions and requests necessary for customer's use of goods and services; such information which explicitly belongs to an identified or identifiable real person and are a part of the data filing system
<b>Incident Management Information</b>	:	Collected and evaluated information connected with personal data subject about the incidents which may potentially affect our Company, employees and shareholders (e.g. the information collected for investigation related to a person and scope of criminal proceedings with a view to prevent publications by media organs the business activities between our Company and the person who is subject to hearing in a criminal action and also negative publicity about our Company, shareholders and top executives by this way and correctly managing the public in this direction).
<b>Special Categories of Personal Data</b>	:	Data referred to in article 6 of Law; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Marketing Information</b>	:	Personal data processed for the purposes of personalization and marketing our products and services in line with usage habits and needs of the personal data subject and the reports and evaluations produced as a result of such processing; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Risk Information</b>	:	Credit Bureau records and similar personal data processed in order to ensure our technical, administrative, legal and commercial security; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system
<b>Request/ Complaint Information</b>	:	Personal data relating to the receipt and evaluation of all requests or complaints addressed to the Bank, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data filing system

#### **4.5. Deletion, destruction or anonymization of personal data**

Personal data shall be deleted, destroyed or anonymized by our Company either ex officio or upon request by the relevant person, even if they are processed in accordance with the Law and the provisions of other relevant laws, in cases where the reasons for processing cease to exist (TO BE CLARIFIED WITH YKB).

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

Pursuant to especially the Constitution, and the provisions of the Law, the Finance Lease, Factoring and Financing Companies Law and other legislation, our Company exercises due diligence in relation to disclosure of personal data within and/or outside the country.

Accordingly, our Company transfers the personal data and the special categories of personal data into or out of the country based on explicit consent of the personal data subject or for the purposes and under the conditions referred to in article 5(2) and article 6 (3) of the Law, on condition that in the latter case, sufficient measures are taken.

Furthermore, when transferring the personal data and the special categories of personal data to abroad without explicit consent of the personal data subject, our Company shall be entitled to transfer such data to abroad on condition that there is adequate protection in the country where the personal data is to be transferred in addition to the above mentioned conditions or if there is no adequate protection, our Company shall be entitled to transfer such data to abroad on condition that the data controllers in Turkey and the relevant foreign country undertake in writing to ensure adequate protection and such transfer is approved by the PPD Board.

##### **4.6.1 The Third Persons the Personal Data is Transferred to and the Purpose of Transfer**

Your personal data can be transferred to the following categories of parties:

- (i) Legally Authorized Bodies
- (ii) Our Business Partners
- (iii) Our Suppliers
- (iv) Our Shareholders

The scope of the abovementioned parties were received the data and the purpose of data transfer are as follows:

<b>PARTIES DATA IS TRANSFERRED TO</b>	<b>DESCRIPTION</b>	<b>PURPOSE OF DATA TRANSFER</b>
<b>Legally Authorized Bodies</b>	Means the public/private institutions and organizations which are authorized to receive information and document from the Company pursuant to provisions of the relevant legislation, which are Banking Regulation and Supervision Agency, Capital Markets Board, Turkish Central Bank, Financial Crimes Investigation Board, Banking Association of Turkey, Small and Medium Enterprises Development Organization, Revenue Administration, Undersecretariat of Treasury, Social Security Institution, judicial authorities and similar authorized public/private bodies.	personal data is transferred only for the purposes of the relevant public/private bodies requesting the data within their respective legal authorities
<b>Business Partner</b>	Means the parties established in the country and/or abroad and which have cooperation, business	personal data is transferred on limited basis to ensure performance of the purposes of

	partnership and program partnership relationship with the Company for the purposes of sales, promotion and marketing of the products and services of the Company while the Company carries out its commercial operations, which include Credit Bureau, Correspondent Banks etc.	the establishment of the business partnership.
<b>Supplier</b>	Means the parties which provide goods and/or services based on contracts and according to orders and instructions of the Company while the Company carries out its commercial activities.	personal data is transferred on limited basis to ensure that the goods and/or services which are outsourced by the Company from suppliers and which are necessary for performance of the commercial activities of the Company.
<b>Shareholders</b>	Means the controlling shareholders that are established in the country and/or abroad and that manage the business activities and strategies of the Company pursuant to provisions of the relevant legislation.	personal data is transferred on limited basis in order to carry out business activities of the Company pursuant to provisions of the relevant legislation.

#### **4.7. Obligation to Inform**

In the Constitution, it is stipulated that everyone has the right to be informed of his/her personal data. Accordingly, the right to “request information” is also listed in the rights of data subject in article 11 of the Law. In accordance with article 10 of the Law, our Company informs the personal data subjects, while the personal data are collected, about the identity of our Company, the intended purpose for which personal data will be processed, to whom and for what purposes the processed personal data will be transferred, the method and legal grounds of collection of personal data and the rights of the personal data subject pursuant to article 11 of the Law.

In addition, our Company has announced to the personal data subjects and the relevant persons that it performs the personal data processing in accordance with relevant legislation through various publicly open documents, notably this Policy, and so our Company ensures the relevant persons to be informed and provides transparency in personal data processing activities.

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

Our Company exercises great care for ensuring the security of personal data, and in this context, takes the necessary measures for providing the “data security” concerning the following matters, pursuant to article 12 of the Law.

- I. Company ensures that any and all technical and administrative measures are taken to make sure that adequate security level is provided in order to
  - Prevent unlawful processing of personal data,
  - Prevent unlawful access to personal data, and
  - Safeguard personal data.
- II. In case personal data is processed on by another natural or legal person for the Company, the Company shall be jointly liable with such persons with regard to taking the measures set forth in the first paragraph.
- III. The Company ensures that necessary inspections shall be carried out by the Internal Auditing/Internal Check units in order to ensure the implementation of the provisions of the Law.

- IV. The employees of our Company are informed and trained on the law governing protection of personal data and lawful processing of the personal data.
- V. The Company employees and/or any persons who have access to personal as a result of their functions shall not disclose the relevant data to third parties in such a way that breaches the provisions of the Law and other legislation and shall not use them for any purpose except their intended purposes. This obligation continues even after they have retired from their duties.
- VI. The agreements to be executed with the parties that our Company will transfer the personal data must include provisions requiring the persons who receive the personal data take the security measures necessary to protect the personal data and to ensure compliance with such measures in their respective companies.
- VII. Our Company takes necessary technical and administrative measures to the extent allowed by technological means and implementation costs in order to ensure secure storage and prevent destruction, loss or modification of the personal data with illegal intentions.
- VIII. In case unauthorized parties acquire the processed personal data through illegal means, this is communicated to the relevant data subject and the PPD Board as soon as possible. Furthermore, in case the PPD Board deems necessary, this is also announced at the web site of the PPD Board or by another method.

**6. PROTECTION OF THE RIGHTS OF THE DATA SUBJECT**

When the personal data subjects submit their requests regarding the below mentioned rights to the Company, such requests will be concluded free of charge as soon as possible or within thirty days at the latest based on the nature of the request. However, if the transaction requires an extra cost, such cost will be charged by our Company at the rate determined by the PPD Board or other authorities.

In this context, the personal data subjects can submit their requests to our Company in writing or in any other methods that the PPD Board will determine. WE HAD ADDED SUBMISSION THROUGH NOTARY PUBLIC.

The personal data subjects are entitled to

- Find out whether or not his/her data is being processed,
- Request information if his/her personal data has been processed;
- Find out the purpose his/her personal data is processed for and whether or not the data is processed in compliance with such purpose,
- Find out the third-party recipients to whom the data is transferred within the country or abroad,
- In case his/her personal data is processed incomplete or incorrect, request rectification of the same and request that the rectification is communicated to the third persons to whom personal data is transferred;
- Even if the data processing was performed in accordance with provisions of the Law and other laws, request erasure or destruction of his/her personal data in the event that the data is no longer necessary in relation to the purpose for which the personal data was processed, and request that such process is communicated to third persons to whom personal data is transferred,
- Raise objections for the negative consequences occurring against him/her as a result of analysis of the processed personal data by solely automatic means,
- Demand compensation for the damages he/she has suffered as a result of an unlawful processing of the personal data.

**APPENDIX 1: Purposes of Personal Data Processing**

MAIN PURPOSES (PRIMARY)	SUB PURPOSES (SECONDARY)
1. Plan and execute the human resources policies and processes of our Company	Perform the obligations towards the Company employees/former employees arising out of the employment contract and/or the laws
	Plan and/or execute the in-house/outsourced training activities

	Carry out internal/external communication necessary for placement of employee candidate and/or student and/or apprentice
	Plan and/or carry out the application, recruitment and assessment processes of the employee candidates
	Plan and/or execute the employee/employee candidate satisfaction and/or loyalty processes
	Plan and/or execute the fringe benefits and/or benefits for the employees
	Plan and/or execute the corporate communication activities for employees and/or corporate social responsibility and/or non-governmental organization activities participated by the employees
	Plan and/or execute exit procedures of the employees
	Monitor and/or inspect work activities of the employees
	Plan and/or execute the receipt and assessment processes of the suggestions which improve work processes of the employees
	Plan and/or carry out the employment start and/or employment processes of the employees
	Plan and/or execute the performance evaluation processes of the employees
	Plan and/or execute the wages of the employees
	Plan and/or execute the human resources processes
	Plan and/or execute the activities which must be performed for occupational health and/or safety purposes
	Carry Out the Personnel Recruitment Processes
	Plan and/or execute the background check and/or information check activities for personnel recruitment purposes and the reference giving processes for former employees
	Plan and/or Execute the Recruitment, Placement and Operation Processes of the Apprentices and/or Students
	Plan and/or Execute the Appointment – Promotion and End of Employment Processes
	Plan and/or execute the internal orientation activities
	Wage management
	Plan and/or execute talent/career development activities
2. Ensure legal or technical safety of our Company and the individuals who have business relationship with our Company and business continuity	Plan and/or execute emergency and/or incident management processes
	Plan and/or execute the relationships with the main shareholders
	Plan and/or Execute the Necessary Operational Activities So that the Company Activities are Carried Out According to the Company Procedures and/or Relevant Legislation
	Ensure security of the Company systems and operations
	Plan and/or execute the inspection and/or ethical activities of the Company
	Plan and/or execute the financial risk processes of the Company
	Plan and/or execute the operational activities which are necessary for non-ethical and/or misconduct cases involving the employees
	Follow up the legal matters
	Plan/execute the internal audit/internal control/investigation/ethical activities ex officio or upon complaint
	Plan and/or execute the risk management processes related to the products or services offered
	Perform the risk, audit and operational activities in accordance with the framework of the Finance Lease, Factoring and Financing Companies Law
	Plan and/or execute the Financial Risk Processes of the Company
	Ensure that the data is accurate and/or up to date
	Execute the compliance processes as per the international legislation

	Provide information to authorized persons or bodies as per the legislation
3. Customize the products and services offered by the Company in accordance with liking, habits of use and needs of the personal data subjects and then plan and execute the necessary activities in order to propose and introduce such services and products to the personal data subjects	Plan and/or execute the processes for development and increase loyalty for the products and services offered by our Company
	Design and/or execute marketing and promotion/advertisement in digital and/or other media
	Plan and/or perform activities for customer satisfaction and experience
	Identify and/or Assess the Individuals Who Will be Subject to Marketing Activities According to Consumer Behavior Criteria
	Perform data analysis for marketing purposes
	Plan and/or execute market research activities
	Plan and/or execute market processes for products and services
4. Perform the necessary works and relevant business processes by our business units so that the products and services offered by the Company are used by the personal data subject,	Create and/or execute the loan application process
	Create and/or monitor loan assessment and allocation process
	Create and/or execute loan use process
	Loan monitoring (monitoring payment transactions)
	Plan and/or execute the customer relationship processes
	Follow up customer requests or complaints
	Plan and/or execute the post-sales support services and activities
	Monitor agreement processes and/or legal requests
	Plan and/or execute the processes for providing tools and/or information to customer which are adequate for the channels to be used by the customer for accessing and/or using the products and/or services
	Carry out the activation processes related to the products and/or services
	Create and/or monitor the application processes for the products and/or services
	Create and/or monitor the usage processes for the products and/or services
	Plan and/or execute the sales processes for the products and/or services
	Create and/or monitor the allocation and/or assessment processes for the products and/or services
	5. Perform the necessary works and relevant business processes by our business units so that our Company carries out the business and/or operational activities
Develop and/or manage the information technology infrastructure	
Plan and execute information access authorities of the employees	
Monitor finance and/or accounting transactions	
Plan and execute printed or visual or audio activities communication to be shared with the internal and external stakeholders	
Plan or execute the activities for performance of the efficiency/productivity or conformability analysis of the work activities	
Plan and/or execute the work activities	
Plan and/or execute the information access authorities of the business partners and/or suppliers	
Plan and/or execute the activities for ensuring business continuity	
Plan or execute the corporate communication activities	
Plan and/or execute logistics activities	

	Plan and/or execute the Operation and/or efficiency processes
	Plan and/or execute the procurement processes
	Plan and/or execute the social responsibility and/or civil society activities
	Plan and/or execute the sponsorship activities
	Plan and/or execute the supply chain management processes
	Plan and/or monitor planning of the construction and/or building works
6. Plan and/or execute the commercial and/or business strategies of the Company	Perform and/or execute the budget works
	Manage the relationships with business partners and/or suppliers
	Execute the strategic planning activities