

YAPI KREDİ FAKTORİNG ANONİM ŞİRKETİ
CUSTOMER CLARIFICATION TEXT

As the data controller, Yapı Kredi Faktoring Anonim Şirketi (“**Company**”) may process your personal data as follows according to the Personal Data Protection Law No 6698 (“**Law**”).

The Purposes and the Legal Reasons for Processing Personal Data

Your collected personal data may be processed for the following purposes (“**Purposes**”) within the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law.

Personal Data Categories	Personal Data Processing Purposes	Legal Reasons
Your identification, contact-information, customer transaction, and financial data	<ul style="list-style-type: none">➤ Plan or execute factoring processes,➤ Create or perform the factoring application process,➤ Update customer contact information,➤ Plan or execute the activities for customer relation services after the factoring agreement,➤ Monitor factoring contract processes or legal requests.	<ul style="list-style-type: none">➤ It is necessary to process the personal data of the parties to a contract, provided that it is directly related to the making or performance of the contract.
Your identification, contact-information, customer transaction, and financial data	<ul style="list-style-type: none">➤ Manage customer relations,➤ Follow-up financial transactions,➤ Plan or execute the activities to carry out effectiveness/efficiency or appropriateness analyses of factoring operations,➤ Plan or execute factoring activities,➤ Plan or execute business continuity activities,➤ Perform strategic planning activities,➤ Plan and execute operational risk processes,➤ Carry out information security processes,➤ Plan and execute customer satisfaction and corporate communication activities,➤ Perform sweepstakes, campaigns, competitions, promotions, or advertising activities,➤ Execute compliance processes as per international legislation.	<ul style="list-style-type: none">➤ Data processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.
Your identification, contact-information, customer transaction, and financial data	<ul style="list-style-type: none">➤ Execute requirements of public authorities,➤ Ensure compliance with the storage obligations stipulated in the legislation,➤ Respond to applications of data subjects as per the legislation and execute the necessary procedures,➤ Plan or execute company financial risk processes,➤ Plan/execute risk management processes related to the offered products or services,➤ Plan or execute operational risk processes,	<ul style="list-style-type: none">➤ Data processing is explicitly required in the law and is mandatory for the data controller to fulfill its legal obligation.

	<ul style="list-style-type: none"> ➤ Establish identity and address information to fulfill the legislative obligations, ➤ Provide the information required by the legislation to authorized persons or establishments, ➤ Respond to information requests of authorized institutions and establishments such as BRSA, CMB, CBRT, Ministry of Treasury and Finance, MASAK, Turkish Banking Association Risk Center, Revenue Administration, SSI, Central Registry Agency, Credit Bureau, ➤ Perform obligatory stipulations dictated by the relevant legislation notably Law No 6361 on Financial Leasing, Factoring, Financing, and Savings Financing Companies, Law No 5549 on Prevention of Laundering Proceeds of Crime, and Law No 6493 on Payment and Securities Settlement Systems, Payment Services, and Electronic Money Institutions. 	
Your identification, contact-information, customer transaction, finance, demand and complaint data	<ul style="list-style-type: none"> ➤ Follow-up legal affairs, ➤ Finalize customer demands or complaints. 	<ul style="list-style-type: none"> ➤ Data processing is necessary for the establishment, exercise, or protection of a right.
Your identification and contact data	<ul style="list-style-type: none"> ➤ Send advertisements, promotions, campaigns, and similar commercial electronic messages to your contact information you share with our company 	<ul style="list-style-type: none"> ➤ (Employees of merchant or tradesman customers) Data processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. ➤ (Other persons) Explicit consent

The Parties Your Processed Personal Data may be Transferred to and the Purposes of Transfer

Within the scope of the data processing conditions set out in Articles 5 and 6 of the Law, your personal data may be transferred in accordance with the personal data transferring rules stipulated in articles 8 and 9 of the Law.

Recipient Persons/Establishment	Our Purposes of Transfer
➤ Our business partners, affiliates, shareholders <i>(Refers to the parties we collaborate or have business partnership for the sale of our Company's products and services, especially factoring processes)</i>	➤ Conduct our business activities
➤ Financial Group Companies <i>(Refers to the financial group companies included under the umbrella of Yapı & Kredi Bank Financial Group, whose parent legal entity is Koç Holding A.Ş., established pursuant to Law No 5549, and which reports to the said parent company.)</i>	➤ Perform our legal obligations.
➤ Our suppliers and service providers <i>(Refers to our suppliers that provide services in financial consultancy, information technology infrastructure, marketing processes.)</i>	➤ Conduct our business activities
➤ Legally authorized public agencies and legally authorized private entities <i>(Refers to the private and public entities authorized to require information and documents under the relevant legal regulations or legal processes, and the private and public institutions that are entitled to receive information in accordance with legal regulations, and the private and public entities with which we confirm information to ensure legal transaction security. E.g.: BRSA , CMB, CBRT, Ministry of Treasury and Finance, MASAK , Turkish Banks Association, Risk Center, Credit Bureau , Revenue Administration , judicial authorities, etc.)</i>	➤ Perform legal reporting and information requirements, carry out legal auditing activities, operate legal processes, fulfill our obligations pursuant to the legislation.
➤ Legally authorized public agencies residing abroad, legally authorized private entities and foreign banks and factoring institutions with which transactions are carried out.	➤ Perform legal obligations within the scope of combating international financial crimes, and also factoring and correspondent banking transactions.

Method of Collecting Your Personal Data

Your personal data is collected electronically, through fax, short messages (SMS), WhatsApp, mobile factoring, tablet, and our internet sites and at physical settings when you contact our Company at the head office or one of our branches.

The Rights of Data Subject Listed in Article 11 of the Law

We hereby inform you that you have the following rights regarding your personal data as per Article 11 of the Law:

- Learn whether your personal data are processed or not,
- Demand information as to if your personal data have been processed,
- Learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- Know the third parties to whom your personal data are transferred in Turkey or abroad,
- Request the rectification of the incomplete or inaccurate data, if any, and notification of any such rectification to third parties who were received the personal data,
- Request the deletion or destruction of your personal data in case the reasons requiring processing no longer exist, even though it has been processed as per the law and other relevant legal provisions, and notification of any such deletion or destruction to third parties who received the personal data,
- Object to the occurrence of a result against your interests due to analyzing the data processed solely through automated systems,
- Claim compensation for the damage arising from the unlawful processing of your personal data.

As the data subject, if you submit your request about your rights by completing the [Data Subject Application form](#) at www.ykfaktoring.com.tr, it shall be processed and finalized as soon as possible and by no later than within 30 (thirty) days, depending on the nature of the request. However, if processing your request imposes an additional cost, the fees determined in the tariff by the Personal Data Protection Board shall be charged by the Company.