

Dear customers,

We, as T. Garanti Bankası A.Ş., respect to and care on protection of confidentiality of your personal data and your right of privacy. We are hereby presenting to your attention this public disclosure text prepared in order to inform you about your rights regarding processing, transfer, storage and destruction of your personal data you have shared with us **for the services offered specifically by our Bank together with Garanti Yatırım Menkul Kıymetler A.Ş. in the course of brokerage for order submission, and also for the services rendered by our Bank within the frame of underwriting, portfolio brokerage and custody services (“Investment Services”)**, and regarding use and protection of your personal data, pursuant to and under the Personal Data Protection Law no. 6698 (“KVKK” / “Law”).

As described in this public disclosure text, your personal data may be recorded, registered, archived, updated, transferred and classified under the applicable laws and regulations, and be processed in ways and by methods listed in the Law and other related laws and regulations.

## **I. Data Controller**

This public disclosure is made by T. Garanti Bankası A.Ş., acting as and in the capacity of data controller, in accordance with the Law no. 6698, the Banking Law no. 5411, the Capital Markets Law no. 6362, the Law on Debit Cards and Credit Cards no. 5464 and other applicable laws and regulations pertaining thereto. As per the Law, “Data Processing” refers to all kinds of actions taken on data such as acquisition, recording, registration, storage, updating and classification of personal data, or sharing of personal data with or transfer of the same to third parties to the extent permitted by laws, fully or partially by automatic ways or non-automatic ways, providing that it is a part of any data registration system.

We, as data controller, are keeping all kinds of personal data shared by you with by us in strict compliance with the applicable laws and regulations and by taking all kinds of technical and administrative measures and actions required for achievement of an appropriate security level.

## **II. Personal Data Collected by Us**

**Within the scope of services offered by our Bank within the frame of Investment Services**, personal data which vary depending upon the type, kind and past of the relations between the Bank and the related person, and the method of acquisition of data, and the following purposes, and which are processed in compliance with the principles set down in the Law and in our Bank’s Personal Data Protection And Processing Policy, are generally comprised of the following data, without however being limited thereby:

- **Identity Data:** First name, surname, T.R. identity number, passport number, birth place, birth date, gender, marital status, information on spouse/children, nationality status, citizenship registration data and information
- **Visual Records:** Photograph
- **Communication Data:** Address, electronic mail, registered electronic mail address, mobile phone number, fixed telephone number and facsimile number and similar other communication data, as well as telephone calls and conversations, video conversations and electronic mail correspondences and communication records and other audiovisual data
- **Transaction Security Data:** Customer information, IP addresses, passwords and ciphers needed for entry to electronic banking channels, and security applications employed in these channels, and positioning data processed for such purposes as performance of legal obligations, and biometrical data processed in reliance upon consent of the related persons
- **Marketing Data:** In line with a permission to be received from our customers, prospective customers and other natural persons who may be related thereto, data on past shopping activities, questionnaires, cookie records, data obtained through campaigns, internet web sites offering the opportunity of comparison, and such other data received from advertising and marketing service providers contracted by us for direction purposes, and data collected from such parties as stores, dealers and electronic trading sites which give support services to our Bank and stand as an intermediary for establishment of credit relations with you
- **Data on Commercial Life:** Information on natural persons in such documents as tax chart, trade registry gazette, certificate of authorization, trade registry documents, certificates of competence, signature circular and certificate of activity relating to legal entities, and tax liability status, and various other demographical data introducing the data owner
- **Banking and Finance Data:** Pricing, reconciliation and customer information produced by our Bank and Garanti Yatırım Menkul Kıymetler A.Ş., and uniform numbers relating to products and services bought by customers from our Bank and Garanti Yatırım Menkul Kıymetler A.Ş., and all kinds of capital market instruments defined in the Capital Markets Law no. 6362, especially share certificates, mutual funds and derivative instruments, and account numbers relating to such products, and CRA (Central Registry Agency) and Takasbank registry numbers, and credit reference numbers, credit card numbers, account numbers and IBAN relating to the share certificates, and all kinds of detailed financial data and information with regard to collection and payment activities

- **Your Information on Education, Business and Professional Life:** Profession, job title and position, working information, education status and curriculum vitae, and information on past experiences in capital markets
- **Legal Information:** Information in correspondences with juridical authorities, information in case files, information and data kept in the course of alternative dispute resolution ways, acquired by our Bank and Garanti Yatırım Menkul Kıymetler A.Ş. due to and during the legal disputes and proceedings involved in by our Bank, as well as data given in the subpoenas and writs issued by all and any administrative and juridical authorities and delivered to our Bank

### III. Personal Data Collection Method

Your personal data are obtained and acquired ***within the scope of services offered by our Bank within the frame of its Investment Services***, and your personal data may be received by during face-to-face meetings and interviews, or through call centre, internet website, e-mail, digital messaging platforms and telephone conversations with our branches. Your personal data may also be collected verbally or in written or electronic media both through our Head Offices, Branches, kiosks placed in branch offices for your banking transactions, ATMs, Customer Communication Centre, Garanti BBVA Mobile and Internet Branch and similar other channels, as well as our support service providers, and institutions for which we stand as a broker in order submission, and via system integrations (such as the Banks Association of Turkey Risk Centre and Identity Sharing System) shared through public administrations and entities.

Your personal data may be obtained and collected by the following methods:

- Your personal data may be obtained by a non-automatic method through face-to-face service channels (Head Offices and branches, direct sales teams and support service providers / outsourced service providers, corporations we provide services as intermediary/agency, and contracted dealers).
- Your personal data may be obtained by a non-automatic method from the Banks Association of Turkey Risk Centre or companies established by at least five banks or other financial institutions (Interbank Card Centre, Credit Registration Bureau, etc.).

### IV. Personal Data Processing Purposes and Legal Causes

Your personal data acquired and obtained by T. Garanti Bankası A.Ş. are processed for the following purposes and legal causes ***for services offered specifically by our Bank within the frame of its Investment Services:***

Our Processing Purposes	Legal Causes
To record identity, address and other required data and information of customer for know-your-customer purposes, for identification and identity verification, and for collection of information in transactions to be executed by our customers.	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is explicitly required by the laws</li> <li>➤ If data processing is compulsory for establishment, use or protection of a right</li> <li>➤ If a prior explicit consent is taken</li> </ul>
To use in products and services provided <b>within the frame of Investment Services</b> , and for execution, completion and development of transactions related thereto, and management of processes regarding capital market products in the course of brokerage for order submission, and conduct of operational processes, and compliance with internal systems, risk monitoring and information obligations, and performance of duties arising out of contract/contracts signed by you with our Bank	<ul style="list-style-type: none"> <li>➤ If it is required to process personal data belonging to the parties of a contract, providing that it is directly related with establishment or performance of that contract</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>
Performance of obligations and duties arising out of the Banking Law, the Capital Markets Law, the Law on Debit Cards and Credit Cards, the Law on Prevention of Laundering of Criminal Revenues, the Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions, the secondary regulations published by the Capital Markets Board and other applicable laws and regulations	<ul style="list-style-type: none"> <li>➤ If it is explicitly required by the laws</li> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> </ul>
Analysis and development of banking systems, and conduct of information security processes, and establishment, management and	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the</li> </ul>

application of infrastructures for information systems	fundamental rights and freedoms of the related person are not impaired
Building of the Bank's business processes and activities, and planning and handling of operational processes and service purchasing operations	<ul style="list-style-type: none"> <li>➤ If it is required to process personal data belonging to the parties of a contract, providing that it is directly related with establishment or performance of that contract</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>
Management of relations established with support service providers, business partners or suppliers, and provision of support services after service sales	<ul style="list-style-type: none"> <li>➤ If it is required to process personal data belonging to the parties of a contract, providing that it is directly related with establishment or performance of that contract</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>
Development of the Bank's reputation and business relations, and determination of its strategies, and planning and execution of business activities and operational processes, and conduct of corporate communication activities	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>
Management of legal cases and execution proceedings, and follow-up and conduct of other legal processes involved in by the Bank	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is explicitly required by the laws</li> </ul>
Performance of business activities carried out by the Bank with its controlling shareholder and local and foreign branches, affiliates and subsidiaries, and management of their relations	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is required to process personal data belonging to the parties of a contract, providing that it is directly</li> </ul>

	related with establishment or performance of that contract
Establishment of transaction security in use of electronic banking channels, and protection of customers, Garanti Yatırım Menkul Kıymetler A.Ş., our Bank and banking system against fraud, deceit and similar other attacks our customers may be exposed to in all kinds of physical or electronic media, and keeping of logs in case of use of internet access	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>
To keep and report all information that may be requested by such juridical and administrative authorities as Banking Regulation and Supervision Agency (BDDK), Capital Markets Board (SPK), Turkish Capital Markets Association (TSPB), Central Bank of Republic of Turkey (TCMB), Financial Crimes Investigation Authority (MASAK) , National Revenue Administration (GİB), BIST (Istanbul Stock Exchange) and Banks Association of Turkey Risk Centre (TBB Risk Merkezi), and to keep such authorities informed thereabout	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is explicitly required by the laws</li> </ul>
To present and offer all our products and services through all channels, also including electronic banking channels, pursuant to and under the Banking Law, the Capital Markets Law and other applicable laws and regulations	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is required to process personal data belonging to the parties of a contract, providing that it is directly related with establishment or performance of that contract</li> <li>➤ If it is explicitly required by the laws</li> </ul>
To keep and issue all records and documents needed for completion of transactions on paper and in verbal media and in electronic banking	<ul style="list-style-type: none"> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> </ul>

(internet banking, mobile banking, ATM, telephone banking) media, also including the processing of positioning data and information	<ul style="list-style-type: none"> <li>➤ If it is required to process personal data belonging to the parties of a contract, providing that it is directly related with establishment or performance of that contract</li> </ul>
To plan and implement products, services and offering activities specifically for our customers; to provide product, service and working model offers for such purposes as improvement, updating, and renewal of capital markets and banking products and services in line with the developing technologies; and to carry out profiling and segmentation activities	<ul style="list-style-type: none"> <li>➤ If a prior explicit consent is taken</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>
To plan, supervise and implement our corporate sustainability, corporate governance, strategic planning and information security processes	<ul style="list-style-type: none"> <li>➤ If it is explicitly required by the laws</li> <li>➤ If it is absolutely required for performance by the Bank of its legal obligations and duties</li> <li>➤ If it is absolutely needed to process data for our Bank's legitimate interests, providing that the fundamental rights and freedoms of the related person are not impaired</li> </ul>

Your personal data are acquired and collected via all kinds of verbal, written, visual and electronic media, for the purposes listed hereinabove and for being able to provide banking and capital market services within the specified legal framework and for full and proper performance of all contractual and legal obligations of T. Garanti Bankası A.Ş. in connection therewith. Legal causes of collection of your personal data are the related provisions of the Law and other applicable laws and regulations. Your personal data are being processed by T. Garanti Bankası A.Ş. by automatic and non-automatic ways and methods only with a prior explicit consent of you pursuant to article 5/1 of the Law or in reliance upon other legal causes as per article 5/2 of the Law.

## V. Transfer of Personal Data

Where it is required by the laws and regulations and permitted by you, your personal data may be shared with or transferred to third parties and authorities in line with the purposes referred to in Section III of this Public Disclosure Text with all kinds of technical and administrative measures and actions duly taken for establishment

of an appropriate security level pursuant to and under the Law and other applicable laws and regulations. Such third parties and authorities are generally the parties listed below, though it may vary depending upon the changes or amendments in the applicable laws and regulations.

Your personal data may be transferred to the following parties for the following purposes and legal causes:

Recipient Persons and Entities	Our Purposes of Transfer
<ul style="list-style-type: none"> <li>➤ Public entities and administrations and juridical authorities who are legally authorized to request information</li> </ul>	<ul style="list-style-type: none"> <li>➤ For such legal causes as making legal reporting, and handling of regulation and supervision activities, and operation of complaints and other legal processes, etc.</li> </ul>
<ul style="list-style-type: none"> <li>➤ Local and foreign banks</li> <li>➤ Persons and entities permitted by the Banking Law, the Capital Markets Law and other applicable laws and regulations, and organizations considered as financial institutions, and other third parties, and Interbank Card Centre, Credit Registration Bureau and companies founded by at least five banks or financial institutions as per the Banking Law no. 5411, and public or private legal entities such as Banking Regulation and Supervision Agency (BBDK), Central Registry Agency (MKK), Takasbank, Capital Markets Board, (SPK) Central Bank of Republic of Turkey (TCMB), Financial Crimes Investigation Authority (MASAK), National Revenue Administration (GİB), Ministry of Commerce, BIST (Istanbul Stock Exchange), Banks Association of Turkey Risk Centre (TBB Risk Merkezi) and Turkish Capital Market Association(TSPB) for the required legal reporting duties</li> </ul>	<ul style="list-style-type: none"> <li>➤ For handling and conduct of banking and/or capital markets activities and for performance of legal obligations and duties</li> </ul>



<p>➤ Our principal shareholder</p>	<p>➤ Solely in the exceptional circumstances and cases listed in the Banking Law no. 5411 and in the Regulation on Sharing of Secret Information issued by the Banking Regulatory and Supervisory Authority</p>
<p>➤ Third parties for which we provide brokerage services for order submission or agency services, and our affiliates (For instance, <i>particularly Garanti Yatırım Menkul Kıymetler A.Ş., as well as Garanti Emeklilik ve Hayat A.Ş., Eureka Sigorta A.Ş., Garanti Konut Finansmanı Danışmanlık Hizmetleri A.Ş., Garanti Faktoring A.Ş., Garanti Finansal Kiralama A.Ş., Garanti Ödeme Sistemleri A.Ş., Garanti Bilişim Teknolojisi ve Ticaret T.A.Ş., and Garanti Portföy Yönetimi A.Ş.</i>) and program partners from which we receive services or enter into cooperation for conduct of our banking and capital market activities</p>	<p>➤ For conduct of activities with our affiliates and other parties giving support to our Bank for provision of our banking and capital market services</p>

## VI. Your Rights Regarding Protection of Personal Data

At any time you wish, you may apply to our Bank and:

- a) May learn whether your personal data are processed or not, and if processed, may demand for which purposes, and whether they are used for the intended purposes thereof or not, and if processed, may request information thereabout; and
- b) May learn identity of third parties to whom your personal data are transferred in Turkey or abroad in accordance with the Law; and
- c) If you believe your personal data are processed incompletely or inaccurately, may request rectification; and

- d) May request erasure or destruction of your personal data within the frame of the conditions referred in article 7 of the Law; and
- e) May demand that your requests specified in subparagraphs (c) and (d) hereof are notified to third parties to whom your personal data are transferred, and may request such third parties as well to take the same actions; and
- f) May object to the occurrence of a result that may emerge to the detriment of you due to analysis of your personal data by automatic systems, or if you believe that your personal data are registered or used illegally and if you have suffered damages therein for, may claim. compensation for the damage arising from the unlawful processing of your personal data.

If you use any one of your rights to learn whether your personal data are processed or not, and if processed, to request information thereabout, and to have access to your personal data, and to request your data, and to learn the purposes of processing, and whether your personal data are used for the intended purposes thereof or not, and to learn identity of third parties with whom your personal data are shared in Turkey or abroad, then, the requested information will be notified to you in writing in electronic media or by using the communication data given by you.

## **VII. Data Security and Request to the Data Controller**

Your personal data are carefully protected within the technical and administrative opportunities, and the required security measures are taken at a level fit to the probable risks by also considering the available technologic opportunities.

Your requests under the Law may:

- Be delivered by you by hand in writing to our Head Offices or branches or
- Be sent via a notary public or
- Be sent with secure electronic or mobile signature to our KEP address [garantibankasi@hs02.kep.tr](mailto:garantibankasi@hs02.kep.tr) by use of your registered electronic mail address or your electronic e-mail address registered in our system.

If the application you file for the above cited purposes leads to an additional cost, you may have to pay the amount of fee set down in the tariff rates to be determined by the Personal Data Protection Board. Your requests in your application will be fulfilled as soon as possible and at the latest in 30 (thirty) days, depending on the type of request.

\* In case of any change in the personal data inventory work, our Bank will update this information text.

T. Garanti Bankası A.Ş.