

BRIEF ON THE CODE OF PERSONAL DATA PROTECTION

The purpose of this letter is to inform you about the “Code of Personal Data Protection”.

As per the Code of Personal Data Protection 6698 (“KVKK”), your personal data either given by you or obtained by us through various channels with regard to the services rendered by Şeker Yatırım, may be recorded, classified, processed, stored, updated and disclosed to third persons, to the extent allowed by legislation, by Şeker Yatırım as Data Controller, and for the purposes and scope described below.

Your personal data includes identity details such as given name, surname, citizen ID, or family status details, account details, IP, phone and address details, any and all other kinds of information that may distinguish you, such as voice.

Your personal data may be obtained by Head Office and Branches, via customer meetings, digital / printed applications directly filed to sales teams, internet branch, all mobile apps, call centers, companies we deal business with, social media, market intelligence, Address Sharing System, SMS channels, and other channels, and shall be stored during legal periods under related legislation.

Your personal data may be disclosed to national and international competent authorities / entities, administrative and public authorities, all real and legal persons inland or abroad where national and international legislation and conventions request so, independent audit companies under legal restrictions, enterprises authorized under Capital Markets Law, regulatory bodies, Turkish Central Bank, real and legal persons inland or abroad where we achieve cloud services for data storage, our contractual inland and abroad organizations and third persons for data transfer, inland affiliates of our company, subsidiaries, main shareholder, companies dealing with intermediation/agency services, program partner enterprises (Infina, Risk Türk, Foreks, Matriks, Meta Trader), and to third parties inland or abroad.

Your personal data, for aforementioned purposes, shall be processed under Capital Markets Law, Banking Law, Tax Procedures Law, MASAK Directives, Social Security Institution’s legislation, in order to offer Şeker Yatırım’s products and services, to get into touch with regard to such services, to be used for marketing purposes –if so consented-, to deal with product/service offering, modelling, reporting, existing or innovative product studies by Şekerbank T.A.Ş. and affiliates thereof, prospect customer detection etc., and in connection with the Banking activities, and also for the purpose of storage, keeping and update of personal data on cloud systems via third persons.

Save for the circumstances prescribed by clause 28 of the KVKK – “Exceptions”; clause 11 of the Code grants the data subject following rights: to learn whether your personal data are processed; to request information, if personal data are processed; to learn purpose of personal data processing, and whether those are utilized for such purpose; to be aware of third persons such personal data are transferred to, inland or abroad; to ask for correction of personal data, if the same are missing or erroneously processed; to ask for deletion or anonymization of personal data under clause 7 of the KVKK, if related grounds do not exist anymore and to the extent legislation allows so; to ask for notification of third persons about such correction, deletion/anonymization; to oppose to an adverse conclusion which may arise out of analysis of data processed solely through automated systems; and to ask for indemnification of loss, in case of loss, due to illegal process of personal data.