

DENİZ YATIRIM MENKUL KIYMETLER A.Ş. PRIVACY NOTICE TEXT ABOUT THE PROCESSING OF YOUR PERSONAL DATA

This Data Privacy Notice Regarding Personal Data Processing (“Privacy Notice”) has been prepared in accordance with the Law on Protection of Personal Data (LPPD) numbered 6698 in order to inform you on your personal data processed by Deniz Yatırım Menkul Kıymetler A.Ş. (“Deniz Yatırım” “Enterprise”), methods of collecting your personal data, legal basis and purpose of processing your personal data, persons/institutions where your personal data are transferred to, purpose of transfer and the rights of the natural persons whose personal data are processed.

As Deniz Yatırım Menkul Kıymetler A.Ş. we act as the Data Controller as per LPPD and take necessary measures on processing and keeping your personal data.

The table below shows information about us.

Title	Deniz Yatırım Menkul Kıymetler A.Ş.
Address	Büyükdere Cad. No:141 Esentepe Şişli ŞİŞLİ / İSTANBUL
Mersis No:	0291011078300013

DenizBank Financial Services Group entities under this Notice refers to direct and indirect domestic and foreign subsidiaries of DenizBank and other shareholders including the shareholder together with their sister companies and subsidiaries.

1. Your Processed Personal Data

Your personal data processed by our enterprise are listed in the table below on the basis of categories:

Data Category	Personal Data
Identity	<i>Name-surname, mother’s and father’s name, date of birth, place of birth, marital status, ID card serial number, Republic of Türkiye ID number, etc.</i>
Contact Information	<i>Address number, e-mail address, contact address, registered e-mail address (KEP), telephone number, etc.</i>
Legal Proceedings	<i>Information in correspondence with judicial authorities, information in court files, etc.</i>
Customer Transactions	<i>Call center records, invoice, capital markets instrument trading transactions, credit details, eligibility and suitability test results, transaction request information etc.</i>
Risk Management	<i>Information processed to manage commercial, technical and administrative risks etc.</i>
Location	<i>Location information etc.</i>
Professional Experience	<i>Profession, title, work information, education status, etc.</i>
Transaction Security	<i>IP address information, website log in – log out information, password and passcode information, etc.</i>

Finance	<i>Balance sheet information, financial performance information, credit and risk information, wealth information, etc.</i>
Marketing	<i>Information on surveys, cookie logs, information obtained via promos etc.</i>
Visual and Audio Records	<i>Call center records, audio and visual records etc.</i>

2. Methods of Obtaining Your Personal Data

We collect, use, share and keep your information in order to provide you with the products and services you requested from us and share information on services that may attract you. Your personal data may be collected directly from you or from third persons via methods that are automated, semi-automated or not automated.

(i) Methods of Collecting Your Personal Data From You;

With semi-automated methods;

Your personal data in the categories of *Identity, Contact Information, Legal Proceedings, Customer Transactions, Risk Management, Finance, Professional Experience, Marketing, Visual and Audio Records* are obtained from you through physical environments (head office, branches, etc.) or digital media (mobile banking, website, customer communication center, etc.) in cases where you apply our bank to become our customer.

With automated methods:

To ensure your transaction security when you download any of our mobile applications, use our websites or digital services; we may obtain information on your location information, IP address which your device is connected to, your information on logging in and out of online banking, type of the device you use, information on type of operating system, password and passcode information, how you access such services and how you use them, while you use digital environments such as our Enterprise's internet branch, which are included in *transaction security* data category.

(ii) Methods of Collecting Your Personal Data From Third Parties;

With automated methods:

We can collect your personal information in the categories of *Identity, Contact Information, Legal Proceedings, Customer Transactions, Risk Management, Finance, Marketing, Visual and Audio Records* through the below entities and institutions or persons via automated methods:

- Our controlling shareholder Denizbank A.Ş.
- Companies for which we carry out brokerage activities within the scope of the Capital Markets Law
- Contracted hardware or software services and contracted institutions that help us improve your personal data and enable us to offer you more relevant and attractive products and services
- Parties that the bank receives complementary or extended services such as fax, post, cargo or courier, contracted companies and support services and outsource companies and dealerships and sales offices
- Publicly available data such as media news and online records or directories

With non-automated methods:

We can collect your personal information in the categories of *Identity, Contact Information, Legal Proceedings, Risk Management, Finance, Professional Experience* through the below entities and institutions or persons via non-automated methods:

- Unions and associations such as trade and artisan chambers
- Joint account holders
- Persons assigned to act on your behalf
- Companies you own or you are associated with – investment companies, partnerships or business partnerships along with their directors, shareholders, trustees, authorised persons or proxies
- Judicial Bodies

3. What we use your personal data for and the legal basis for doing so

We have several legal bases for the activities we carry out. Those legal bases and our purpose of using your personal data have been explained in the table below.

Personal Data Categories	Our purpose of using your Personal Data	Legal basis
Identity, Finance, Visual and Audio Records, Contact Information, Customer Transactions, Transaction Security, Risk Management, Professional Experience	Within the scope of the Capital Markets Law No. 6362, intermediation in order transmission, transaction intermediation, portfolio intermediation, portfolio management, investment consultancy, intermediation in public offerings, custody and management of capital market instruments on behalf of the customer, operation of multilateral trading systems and other organized marketplaces outside the stock exchange, providing consultancy services related to capital markets, providing loans or lending and foreign exchange services limited to investment services and activities, to conduct investment research and financial analysis or provide general advice on transactions related to capital market instruments, to provide services related to the execution of intermediary undertakings, to provide intermediary services in obtaining financing through borrowing or other means, to provide wealth management and financial planning services and other services to be determined by the Capital Markets Board (“Board”) and to perform, execute and enhance transactions related to these, including those that may be offered as an agent	As per article 5/2(a) of LPPD, if it is expressly envisaged in the laws As per article 5/2(ç) of LPPD, if it is mandatory for the data controller to fulfill its legal obligations As per article 5/2(c) of LPPD, if processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement
Identity, Finance, Visual and Audio Records, Contact Information, Customer	To assess loans and collaterals, research intelligence and information and manage	As per article 5/2(a) of LPPD; It is expressly envisaged in the laws

<p>Transactions, Transaction Security, Risk Management, Professional Experience</p>	<p>loan sales, allocation, lending, follow up and monitoring processes</p>	<p>As per article 5/2(c) of LPPD; Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement. As per article 5/2(ç) of LPPD; It is mandatory for the data controller to fulfil its legal obligations. As per article 5/2 (f)* of LPPD, it is in our legitimate interest to make sure our assets are protected.</p>
<p>Identity, Finance, Contact Information, Customer Transactions, Transaction Security, Risk Management, Professional Experience</p>	<p>For participation in the public offering and realization of all other issuance transactions</p>	<p>As per article 5/2(a) of LPPD; It is expressly envisaged in the laws As per article 5/2(c) of LPPD; Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement. As per article 5/2(ç) of LPPD; It is mandatory for the data controller to fulfil its legal obligations.</p>
<p>Identity, Finance, Contact Information, Customer Transactions, Transaction Security, Risk Management</p>	<p>To comply with the legislation on the Prevention of Laundering Proceeds of Crime and Financing of Terrorism and the information retention, reporting and disclosure obligations stipulated by the BRSA, TSPB, CBRT, CMB, BIST, MASAK, BAT, RA, Ministry of Treasury and Finance and other authorities</p>	<p>As per article 5/2(a) of LPPD; It is expressly envisaged in the laws As per article 5/2(ç) of LPPD; being mandatory for the data controller to fulfill its legal obligations</p>
<p>Identity, Finance, Visual and Audio Records, Contact Information, Customer Transactions</p>	<p>To contact you about your products or services or about legislative issues as well as about purposes of providing services</p>	<p>As per article 5/2(a) of LPPD; It is expressly envisaged in the laws As per article 5/2(c) of LPPD; Processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement. As per article 5/2(ç) of LPPD; being mandatory for the data controller to fulfill its legal obligations</p>
<p>Identity, Finance, Visual and Audio Records, Contact</p>	<p>To manage all complaints and requests including customer relations, experience, satisfaction, complaint, objection, request</p>	<p>As per article 5/2(ç) of LPPD, if it is mandatory for the data</p>

Information, Legal Proceedings, Customer Transactions	and proposal along with follow up and execution of legal processes	controller to fulfill its legal obligations As per article 5/2(e) of LPPD; Data processing is mandatory to establish, exercise or protect a right. As per article 5/2 (f)* of LPPD, It is in our legitimate interests to make sure that complaints are investigated. (For instance, by this way, our customers can receive a high standard of service and we can prevent complaints from arising in the future)
Identity, Finance, Visual and Audio Records, Contact Information, Customer Transactions	To check your instructions to us, to analyse, assess and improve our services, and for training and quality purposes (We may monitor or record any communications between you and us, including phone calls, for these purposes)	As per article 5/2(ç) of LPPD; being mandatory for the data controller to fulfill its legal obligations As per article 5/2 (f)* of LPPD, it is in our legitimate interest to check the orders you place at our bank, to prevent and detect fraud and other crimes, analyse, assess, improve our services to our customers, to do these for training purposes and improve the services offered to customer.
Identity, Finance, Contact Information, Customer Transactions, Transaction Security, Risk Management	To keep your money and personal data safe and to carry out checks to detect and prevent fraud, laundering of proceeds of crime and financing of terrorism, to check your identity, address and contact details before providing services to you	As per article 5/2(a) of LPPD, if it is expressly envisaged in the laws As per article 5/2(c) of LPPD, if processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement As per article 5/2(ç) of LPPD, if it is mandatory for the data controller to fulfill its legal obligations
Identity, Finance, Contact Information, Customer Transactions, Risk Management	As per the Article 73/4 of the Banking Law, in the preparation of consolidated financial statements of the main partnerships and in the planning or execution of the relations with the main partnership and risk management and evaluation studies, and risk, audit, operational services carried out with subsidiaries within the framework specified in the Banking Law and relevant legislation and performance of	As per article 5/2(a) of LPPD; if it is expressly envisaged in the laws As per article 5/2(ç) of LPPD; being mandatory for the data controller to fulfill its legal obligations

	risk, audit and operational services to comply with the CMB legislation	
Identity, Finance, Contact Information, Customer Transactions, Transaction Security, Risk Management	As per article 5 of Regulation on Compliance Program towards Obligations on Preventing Laundering Proceeds of Crime and Financing of Terrorism; to ensure that the compliance program of DenizBank Financial Services Group is applied across the financial group and to share information on know-your-customer, account and transactions within the group,	As per article 5/2(a) of LPPD; It is expressly envisaged in the laws As per article 5/2(ç) of LPPD; being mandatory for the data controller to fulfill its legal obligations
Identity, Finance, Contact Information, Legal Proceedings, Customer Transactions, Risk Management	To transfer or share your information with any organization to which your account is or may be transferred in the event of a restructuring, sale or acquisition	As per article 5/2(ç) of LPPD; being mandatory for the data controller to fulfill its legal obligations As per article 5/2 (f)* of LPPD, it is in our legitimate interest for any part or debt of our organization to be restructured or sold.
Identity, Finance, Contact Information, Customer Transactions, Transaction Security	For the management, planning and execution of relations and processes with support/outsource service providers, business partners or suppliers	As per article 5/2 (c) of LPPD, Article 5/2 (f)* of LPPD, it is in our legitimate interest to use other organizations for them to offer services on our behalf.
Identity, Finance, Visual and Audio Records, Contact Information, Customer Transactions, Transaction Security, Risk Management, Professional Experience, Marketing	To realize your transactions in foreign markets through our brokerage within the framework of our CMB permissions	As per article 5/2(a) of LPPD, if it is expressly envisaged in the laws As per article 5/2(c) of LPPD, if processing of personal data belonging to the parties to the agreement is required, on condition that it is directly related to the establishment or performance of such agreement As per article 5/2(ç) of LPPD, if it is mandatory for the data controller to fulfill its legal obligations
Identity, Finance, Marketing, Customer Transactions, Transaction Security, Contact Information, Professional Experience	To realize our marketing activities; Concerning the banking, insurance, retirement, finance and capital market activities (including investment) products and services of our company, its direct or indirect subsidiaries and other shareholders including their controlling shareholder and their subsidiaries and affiliates, and other entities the aforementioned companies do business with or act as an intermediate or an agency for, and all the other products and	As per article 5(1) of LPPD; personal data cannot be processed without the explicit consent of the data subject.

services provided by our company together with the aforementioned companies;

- For the purposes of explaining, promoting and marketing the related products and services, planning and implementing the promotion and communication activities,
- Providing offers from all channels, including digital and social media channels, carrying out promotion, marketing, cross-selling and campaign activities and designing customized marketing and promotional activities for you, carrying out data analytics studies for credits, behavioral scoring, market research and marketing purposes in order to identify and develop suitable products and services for you, carrying out studies on customer satisfaction and experience,
- Conducting studies including surveys, statistical studies,
- Reviewing and analyzing your data, making the marketing messages/advertisements that you receive more relevant and attractive, following up on the advertising and marketing,
- Providing information on the products, services, campaigns, rewards, proposals, promotions, loyalty programs and contests that you may be interested in,
- Sending commercial electronic message for marketing purposes

*We carry out data processing activities on condition that we do not harm your fundamental rights and freedoms, as long as there is a compulsory legal reason to process the data as the data controller, as per article 5/2 (f) of LPPD.

4. Who we will share your personal data with and For What Purposes

Your personal data is shared with the below parties, for the below reasons. In case your personal data is transferred abroad, the transfer will be made within the framework of the provisions of the Article 9 of the Personal Data Protection Law.

DenizBank Financial Services Group: Your personal data may be shared with Denizbank A.Ş for the purposes of preparation of consolidated financial statements, risk management and evaluation studies and internal audit practices of the parent companies within the framework of Article 73 of the Banking Law, and implementation of the compliance program of DenizBank Financial Services Group on a financial group basis,

as well as customer identification and sharing of information on accounts and transactions within the group in accordance with Article 5 of the Regulation on the Program of Compliance with Obligations Regarding the Prevention of Laundering of Proceeds of Crime and the Financing of Terrorism, and receiving support and consultancy services within the scope of the BRSA activity expansion permit dated 25 October 2010 as per the personal data processing conditions and purposes stipulated under the Article 8 of the LPPD regarding the transfer of personal data and Article 9 regarding the transfer of personal data abroad.

Domestic and International Banks and Financial institutions: For the purposes of all kinds of money transfers to be realized through banks and financial institutions or sharing capital market instrument related electronic transfer messages, secure financial transaction messages or other reasons affiliated to the aforementioned transactions, your personal data may be transferred to banks, merchants and financial institutions and processed by them for these purposes.

Our Service Providers and investment institutions engaged in trading and order brokerage activities (including their subcontractors). Your personal data can be shared with contracted consultants, institutions, parties, suppliers, outsource providers, cloud service providers, attorneys, law offices, notaries, company auditors, independent audit companies and other professional consultants and contracted companies that complement the operations of Deniz Yatırım or act as an extension.

In case of your explicit consent, we may share your personal data with **call centers, our service providers and Denizbank A.Ş** for the purposes of conducting market research, surveys or statistical studies to determine the products and services suitable for you, providing information about various services and products that may be of interest to you, preparing product and service offers, carrying out promotion, marketing, advertising and campaign activities, conducting satisfaction and efficiency analysis for the products and services offered, and sending commercial electronic message for marketing purposes.

Your data can be shared with these persons and companies in order to design, develop and sustain internet based tools and applications; receive application or infrastructure (cloud) services; manage marketing activities or events and customer communication; prepare reports and statistics; printing materials and designing products; advertisements in applications and websites; receive legal, audit services or other specialized services; follow up and manage legal processes; audit our activities for legislative compliance; give postal services by our agencies; archive physical records; manage securitizations; offer or receive intermediary collection services.

Your personal data can be shared for the sale of our receivables or for valuation studies of our shares with **third parties, possible buyers and asset management companies after any DenizBank Financial Services Group company or debt is restructured, sold or acquired.**

Anyone we transfer or assign (or may transfer and assign) our rights and obligations, as much as permitted by terms and conditions in any of your agreements signed with us.

With the **consultants** you authorized to represent you (accountants, attorneys and other professionals) or **any other person you indicate as authorized to place orders on your behalf and utilize accounts, products and services** (e.g. with Power of attorney).

Your personal data can be shared with **Turkish and foreign regulatory authorities, police department and authorized bodies in relation to combating crimes** or for social and economic statistical research.

US and/or EU Corporations and Institutions: Your data on account numbers, ID information, address, scope of activity and all accounts, transactions and data can be transferred to and be processed by U.S Internal Revenue Service (IRS), European Capital Market Authority (ESMA) and/or all other US and/or EU institutions in scope of laws and regulations of United States of America (USA) Dodd Frank (Dodd Frank Wall Street Reform and Consumer Protection Act) and FATCA (Foreign Account Tax Compliance Act), ISDA (International Swaps and Derivatives Association) and European Union (EU) EMIR (European Market Infrastructure Regulation) and CRS (Common Reporting Standard) in case you are a US and/or EU real person or legal entity or you trade in US and/or EU markets or you are subject to the tax laws of US and/or EU or due to various legal requirements.

Laws and regulations may oblige us to share your account information with tax authorities directly or through local tax offices. These tax offices, which we share the information with, may share the said information with other suitable tax authorities.

We may share your personal data with **independent audit firms** for the purposes of verifying the accuracy of and reconciling audit documentation within the scope of legal audit of company operations and applications.

We can share your data with **consortium leaders, Issuers and IPO companies** to realize your requests regarding IPO transactions.

We may share your data with persons, institutions and organizations permitted by the provisions of the Capital Markets Law and other relevant legislation, and other third parties with your explicit consent, in order to carry out your capital market transactions, if you have an account, with the **organizations, custodian institutions, portfolio management companies that the Deniz Yatırım operates in favor of and operate in favor of the Deniz Yatırım.**

Public Bodies and Authorities: To fulfill our legal liabilities arising from the Capital Markets Law and Turkish Commercial Code, your data may be transferred to Stock Exchanges, Markets, BRSA, CMB, BIST, SSI, CBRT, MASAK, TSPB, BAT, KOSGEB, RA, Ministry of Treasury and Finance, Takasbank and to ministries, judicial authorities, authorized public institutions and organizations within the scope of information requests, realization of transactions, fulfillment of our legal notification obligation and within the scope of examinations and investigations.

Central Registry Agency (CRA): We may share the legal entity established as per the private law with the Central Registry Agency (Merkezî Kayıt Kuruluşu Anonim Şirketi) for the purposes of dematerialization of capital market instruments, monitoring these dematerialized instruments and the rights attached to them electronically, in dematerialized form, by members and right holders, storing them centrally and fulfilling other duties assigned by the Board within the framework of capital markets legislation.

We may share your personal data with the **financial institutions** operating in the markets in which you are trading and used by our enterprise as a transaction intermediary in your transactions in foreign markets with our intermediation, within the framework of our CMB permissions, and with **other relevant country authorities.**

5. Your Rights

Pursuant to article 11 of the Personal Data Protection Law, you have the following rights related to your personal data;

- a) to learn whether your personal data are processed or not,
- b) to request information if your personal data are processed,
- c) to learn the purpose of your data processing and whether this data is used for intended purposes,
- d) to find out third parties in Türkiye and abroad to whom personal data has been transferred,
- e) to request correction if your personal data were processed incompletely or inaccurately and to request that third persons, to whom your personal data are transferred, get notified about the transactions carried out within this scope,
- f) Despite being processed as per the provisions of the Law numbered 6698 and other relevant laws, in the event that reasons requiring the processing have disappeared, to request the erasure or destruction of your personal data and to request that third persons, to whom your personal data are transferred, get notified about the transactions carried out within this scope,
- g) to object to the processing, exclusively by automatic means, of your personal data, which leads to an unfavourable consequence for you,
- h) to request compensation for the damage arising from the unlawful processing of your personal data.

You can submit your requests within the scope of your rights regarding your personal data via:

- A written petition sent to the address **Büyükdere Cad. No: 141 Esentepe 34394 Şişli / İSTANBUL** or sent through a notary public.
- An e-mail to **denizyatirim@hs02.kep.tr** using your registered e-mail address, with secure electronic or mobile signature.
- By e-mail to **info@denizyatirim.com**, using your e-mail address that you have previously reported to our bank and registered in our system.

We reserve the right to request substantiating documents verifying your identity in order to verify that the application has been made by you.