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### 1. Introduction

Law No. 6698 on the Protection of Personal Data (LPPD) imposes important regulations on the legal processing and protection of personal data. "Personal Data" within the scope of the LPPD is defined as any information relating to an identified or identifiable natural person. The term Personal Data Processing means any transaction from the collection of personal data to its destruction.

Regarding the processing and protection of personal data, applicable legal regulations will be primarily applied. In the event of discrepancy between the legislation in force and the Policy for Protecting and Processing of Personal Data ("Policy"), Odea Bank A.Ş. ("Bank") accepts that the applicable legislation will find an application area. This Policy is constituted from the regulation of the rules laid down by the relevant legislation in the context of the Bank's practices.

### 2. Purpose and Scope

The main purpose of this Policy is to provide detailed descriptions of the systems adopted for destruction and the rules and practices adopted by the Bank for the protection of such Personal Data which is processed by our Bank in accordance with the law, Personal Data processing purposes, Personal data processed persons, recipient groups where Personal Data is transferred, maximum time required for the purpose for which Personal Data is processed, so as to provide transparency by informing the relevant persons (Appendix-1) and public about the processing of personal data by our Bank.

### 3. Related Legal Regulations

- Personal Data Protection Law
- By-Law on Erasure, Destruction or Anonymization of Personal Data
- Personal Data Security Guide (Technical and Administrative Measures)

### 4. Definitions

**Explicit Consent:** It refers to a free given consent on a particular subject, which is based on an information.

**Anonymizing:** Means that Personal Data can never be associated with a specific or identifiable natural person in any way even by pairing it with other data (eg rendering Personal Data unrelated to a natural person by techniques such as masking, aggregation, data corruption, etc.).

**Employee:** means natural persons working at the Bank based on the existing employment contract.

**Electronic Environment:** means environments where personal data can be created, read, modified and written by electronic devices.

**Non-Electronic Environment:** All written, printed, visual etc. means other environments.

**Destruction:** means the erasure, destruction or anonymizing of personal data.

**Recording Media:** It specifies the registration system in which personal data is configured and processed according to certain criteria.

**Data Subject:** means natural person, whose personal data is processed.

**The Personal Data Processing Inventory:** refers to the inventory of the Personal Data processing activities performed by our bank depending on the business processes which details by explaining the Personal data processing purposes, legal reason, data category, group of recipients which data transferred and data subject created by associating with the contact group and the maximum amount of time that Personal Data is

required for the purposes for which it was processed, Personal Data considered to be transferred to foreign countries and measures taken regarding data security.

**Personal Data:** means any type of information relating to an identified or identifiable natural person (For example: name, surname, T.R. Identity Number, e-mail, address, date of birth, credit card number).

**Personal Data of Special Nature:** Means biometric and genetic data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, attire, association foundation or union membership, health, sexual life, criminal conviction and security measures.

**Personal Data Processing:** means any transaction carried out on data such as obtaining, recording, storing, maintaining, changing, rearranging, explaining, transferring, taking over, making available, preventing, classifying or preventing its use of the personal data completely or partially automatically or by non-automatic means provided that it is part of any data filing system,

**Processing Personal Data:** Obtaining recording, storing, to be maintained, modification, rearrangement, disclosure, transfer, takeover, be made available, classification or prevention of use of personal data completely or partially automatically or by non-automatic means provided that it is part of any data filing system.

**Periodic Destruction:** In the event that all of the processing conditions of the Personal Data in the LPPD are eliminated, this shall mean the erasure, destruction or anonymizing process, which shall be performed at the repeated intervals specified in this Policy.

**Erasure:** Erasure of personal data is the process of rendering personal data inaccessible and non-reusable for the users concerned, by no means.

**Data Processor:** means natural or legal person who processes the Personal Data on his behalf on the basis of the authority granted by the Data Officer.

**Data filing system:** means the system where personal data are processed by being structured according to specific criteria,

**Data Controller:** means the natural or legal person who is responsible for setting up and managing the data filing system, determining the purposes and means of processing the Personal Data.

**VERBİS:** Means "Data Officers Registry Information System".

**Destruction:** Personal data destruction is the process of rendering personal data inaccessible, irretrievable or non-reusable by anyone, by no means.

### 5. Basic Principles in Processing of Personal Data

Our Bank adopts the following basic principles in the Processing of Personal Data:

- ✓ Lawfulness and conformity with rules of bona fides.
- ✓ Ensure that the Personal Data is correct and up-to-date.
- ✓ Processing for specific, explicit and legitimate purposes.
- ✓ Bound, limited and measured for the processing purpose.
- ✓ Maintain for a period mentioned in the legislation or for the period for which they are processed.
- ✓ Informing Data Subjects.
- ✓ Setting up the systems required for Data Subjects to use their rights.
- ✓ Take necessary measures to protect Personal Data.
- ✓ To comply with the LPPD and the Personal Data Protection Board ("Board") regulations regarding the transfer of Personal Data to third parties in accordance with the requirements of the processing purposes.

- ✓ Demonstrate the necessary sensitivity to the processing and protection of Specially Qualified Personal Data and to comply with the Law PPD and Board regulations.

### 6. Obligation of Data Controller to Inform

At the time when personal data are obtained by Bank as data controller, Bank informs the data subjects about the following:

- a) the identity of the data controller and of its representative, if any,
- b) the purpose of processing of personal data;
- c) to whom and for which purposes the processed personal data may be transferred,
- c) the method and legal basis of collection of personal data,
- d) other rights referred to in Article 11.

### 7. Legal Reasons and Objectives for Processing Personal Data

The express consent of the Data Subject is one of the legal grounds that enables the personal data to be processed in accordance with the law. Personal Data may be processed in the presence of one of the other conditions listed below without having explicit consent. The basis of the Personal Data Processing activity may be only one of the following conditions, or more than one of these conditions may be the basis of the same Personal Data processing activity:

- ✓ If it is clearly envisaged under the laws,
- ✓ It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- ✓ Processing of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfilment of that contract,
- ✓ To perform Banks' legal obligations,
- ✓ The data concerned is made available to the public by the data subject,
- ✓ Data processing is mandatory for the establishment, exercise or protection of any right.
- ✓ Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data.

In accordance with the above mentioned Personal Data processing requirements, the Personal Data is processed for the following main purposes by our Bank. The sub-objectives related to these main objectives are set out in Appendix-2 (Main Objectives and Sub-objectives to which it is related):

- ✓ Providing the planning and execution of human resources policies and processes of our Bank,
- ✓ Provision of legal, technical and commercial-occupational safety of the persons who are in contact with the Bank and of our Bank
- ✓ Planning and implementation of the activities and services required by the Bank for the promotion of the products and services offered by our Bank according to the tastes, usage habits and needs of the persons concerned.
- ✓ Carrying out the work required by our business units and carrying out the relevant work processes to benefit the people from the products and services offered by our Bank,
- ✓ Carrying out the necessary work by our business units and carrying out the related business processes for the realization of commercial and / or operational activities carried out by our Bank,
- ✓ Planning and / or execution of commercial and / or business strategies of the Bank.

### 8. Legal Reasons for Processing Personal Data of Special Nature

Some of the Personal Data is arranged separately as Personal Data of Special Nature, and is subject to special protection. Special attention has been given to these data because of the risk of causing discrimination or discrimination against persons when it is illegally committed. Personal Data of Special Nature is processed by the Bank in accordance with the conditions set forth in the LPPD and in accordance with the principles set forth in this Policy and with all necessary administrative and technical measures including the methods determined by the Board.

The express consent of the Data Subject is one of the legal grounds that enables the Personal Data of Special Nature to be processed in accordance with the law. Personal Data of Special Nature may be processed in the presence of one of the other conditions listed below without having explicit consent.

- ✓ If explicitly mandated by law,
- ✓ If necessary to protect the life or physical integrity of a person who cannot provide consent due to factual impossibility or whose consent lacks legal validity,
- ✓ If the data has been publicly disclosed by the Data Subject in accordance with their intent,
- ✓ If required for public health, protection, preventive medicine, medical diagnosis, treatment, healthcare service planning, management, or financing by authorized institutions or persons bound by confidentiality obligations,
- ✓ If necessary to fulfill legal obligations related to employment, occupational health and safety, social security, social services, or social assistance,
- ✓ If it pertains to current or former members of, or persons who regularly engage with, organizations, foundations, or associations established for political, philosophical, religious, or trade union purposes, provided that it complies with the applicable regulations, aligns with the organization’s objectives, remains within its operational scope, and is not disclosed to third parties.

### 9. Personal Data Categories Processed by our Bank

In accordance with the LPPD and other relevant legislation provisions, our Bank processes Personal Data which is listed in the Personal Data categories in Appendix-3 (Personal Data Categories) in accordance with the purposes and conditions specified in this Policy.

### 10. Recipient Groups for Transferring Personal Data and Transfer Objectives

Personal Data can be transferred to the categories of people (recipient group) listed below, either domestically or abroad, for the following legal reasons:

- ✓ Legally Authorized Institutions,
- ✓ Business Partners,
- ✓ Suppliers,
- ✓ Shareholders,
- ✓ Official and Private Institutions which our Bank Shares Reference.

The scope of the transfer, the scope of the persons mentioned above and the purposes of data transmission are given below:

People to Transfer Data	Definition
Natural Person and Legal Entity	It refers to people like law offices where the bank transfers data due to services received.

People to Transfer Data	Definition
Legally Authorized Institutions	According to the provisions of the relevant legislation, it refers to public institutions and organizations authorized to transfer the information and documents of the Bank.
Business Partners	It means the parties to which the Bank establishes a business partnership for the purpose of selling, promoting and marketing its products and services, after-sales support and carrying out joint customer loyalty programs.
Suppliers	In the course of carrying out the commercial activities of the Bank, the parties who provide services to the Bank on a contractual basis, in accordance with the Bank's orders and instructions.
Shareholders	Pursuant to the provisions of the relevant legislation, it refers to the shareholders who are authorized to design strategies and audit activities of the Bank regarding its commercial activities. You can reach to the shareholders of the Bank at <a href="https://www.odeabank.com.tr/en-US/about-odeabank/shareholding-structure/Sayfalar/shareholding-structure.aspx">https://www.odeabank.com.tr/en-US/about-odeabank/shareholding-structure/Sayfalar/shareholding-structure.aspx</a> .
Official and Private Institutions which our Bank Shares Reference	In case of reference to human resources processes or when the Bank Employees apply for credit in other institutions, public and private institutions requesting the information of the Bank's current or former employees.

## 11. Obligation to Destroy (Erasure, Disposal or Anonymization) Personal Data

### 11.1 Introduction

Article 138 of the Turkish Penal Code and secondary legislation pertaining to Article 7 of the Law on the Law on Obligations regulates the obligation of the Data Officers to destroy (erasure, disposal or anonymization) Personal Data. In addition, the Personal Data Protection Authority ("Authority") has published the Regulation on the Destruction or Anonymizing of Personal Data ("Regulation"). Under the Regulation, some obligations have been imposed on Data Controllers.

In accordance with the aforementioned legal obligations, our Bank has a Personal Data Processing Inventory, which is kept up-to-date in parallel with its business processes. In the Personal Data Processing Inventory, an Erasure and Storage section was established in parallel with the obligation to destroy (erasure, disposal and anonymization). In this section, records, documents, reports used for each process; limited to the Bank's data processing purposes, the time required for the Bank's data processing, the safe storage and the unlawful processing and protection of the Personal Data, disclosures regarding legal, technical or other reasons requiring the destruction of Personal Data are included.

Although our Bank has processed it in accordance with the provisions of the LPPD and other legislation, Personal Data shall be destroyed (erasure, disposal or anonymization) in accordance with the decision of the Bank or the request of the Data Subject, if the reasons for the processing of such reasons have ceased. The Bank has the discretion to decide the method through which Erasure, Disposal or Anonymization of Personal Data will be used. In this context, our Bank fulfills its obligation with the methods described in this section.

### 11.2 Recording Environment

Personal Data is securely stored in accordance with the law in the environments listed by the Bank in Appendix 4 (Environments).

### 11.3 Explanations on Storage and Destruction

Personal Data belonging to Data Subjects shall be stored and destroyed by the Bank in accordance with the LPPD and the Regulations and Communiqués issued pursuant to the LPPD.

#### 11.3.1 Information on Storage

Article 3 of the LPPD defines the concept of processing of Personal Data; Article 4 stipulates that the Personal Data processed in this Article shall be linked, limited and measured to the purpose for which it was committed, and that it is required to be maintained for the period required for the purposes stipulated in the relevant legislation or for the purposes for which it was committed, and the terms of processing of the Personal Data are counted in Articles 5 and 6.

Accordingly, within the framework of our Bank's activities, Personal Data shall be kept for a period stipulated in the applicable legislation or in accordance with Bank's processing purposes.

#### 11.3.2 Legal Reasons for Storage

The Personal Data processed within the framework of the Personal Data Processing activities of our Bank shall be maintained for a period of time required for the purposes of Personal Data processing as provided by the applicable legislation. In this context, Personal Data shall be kept for the duration of storage as stipulated in the following legislation and the provisions of the secondary legislation to which they relate:

- Law on The Protection of Personal Data no 6698,
- Turkish Code of Obligations no 6098,
- Turkish Code of Commerce no 6102,
- Labour Law no 4857,
- Turkish Criminal Law no 5237,
- Banking Law no 5411,
- Capital Market Law no 6362,
- Law on Consumer Protection no 6502,
- Tax Procedure Law no 213,
- Law on the Prevention of Laundering of Proceeds of Crime no 5549,
- Law on the Prevention of Money Laundering no 4208.

#### 11.3.3 Processing Objectives Require Storage

The Bank stores the Personal Data that it processes in accordance with the Personal Data Processing activities in accordance with the main and sub-objectives set out in Appendix-2.

#### 11.3.4 Reasons for Destruction

In the absence of a necessity or legal basis justifying the retention of Personal Data for a longer period of time:

- Amendment or abolition of the provisions of the relevant legislation that form the basis of its processing,
- The elimination of the purpose of processing or storing,
- Changing of the Explicit Consent of the person when processing the Personal Data only under the conditions of Explicit Consent,
- In case the Bank accepts the application submitted by the person concerned for the erasure or disposal of the Personal Data within the framework of their rights under Article 11 of the LPPD,
- In case the Bank rejects the application made by the person with the request of erasure, destruction or anonymization of the Personal Data, finds his / her answer insufficient or fails to respond within the period stipulated in the LPPD; to file a complaint with the Board and to approve this request by the Board,
- Exceeding the maximum period of time for which Personal Data should be stored.

### 11.3.5 Storage and Destruction Periods

With respect to the Personal Data being processed by the Bank within the scope of its activities;

The storage periods on the basis of the Personal Data categories processed by our Bank are included in the registration of VERBIS; Data Subjects can always access the storage periods for these data categories from VERBIS (<https://verbis.kvkk.gov.tr/>).

### 11.3.6 Periodic Destruction Cycle

In accordance with Article 11 of the Regulation, the Bank has determined the Periodic Destruction Cycle as 6 (six) months. Accordingly, the Bank performs the Periodic Destruction in June and December every year.

## 12. Technical and Administrative Measures for Protecting Personal Data

Technical and administrative measures are taken by our Bank for the protection of Personal Data within the scope of the legislation, Personal Data Protection Board decisions and guidelines and current technology requirements.

The main technical and administrative measures of our Bank can be accessed from the “Security” tab in the VERBIS (<https://verbis.kvkk.gov.tr/>) record of our Bank.

## 13. Audit of Measures Taken on Protection of Personal Data

In accordance with Article 12 of the LPPD, our Bank carries out the necessary audits within its own structure. The results of this audit are reported to the relevant department within the scope of the Bank's internal operation and the necessary activities are carried out to improve the measures taken.

## 14. Using the Rights of the Data Subject

The Data Subjects will be able to submit their requests regarding the following rights in the LPPD and the Bank's informing text to our Bank. Regarding personal data, the legal rights that the Data Subject may use are listed below:

- 1) To learn whether his personal data are processed or not,
- 2) To request information if his personal data are processed,
- 3) To learn the purpose of his data processing and whether this data is used for intended purposes,
- 4) To know the third parties to whom his personal data is transferred at home or abroad,



- 5) To request the rectification of the incomplete or inaccurate data, if any,
- 6) Requesting the deletion, destruction or anonymization of the Personal Data and the notification of the Personal Data of the transaction to the third parties to which the transaction is made, even if the reasons that need to be processed have been eliminated in accordance with the Law and other related provisions,
- 7) To object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- 8) To request compensation for the damage arising from the unlawful processing of his personal data.

The application made by the Data Subject must include the following considerations.

- a) First name, last name and signature if the application is written,
- b) For citizens of the Republic of Turkey identification number, nationality for foreigners, passport number or identification number, if any,
- c) Address of the place of settlement or place of business based on the notification,
- e) E-mail address, telephone and fax number based on notification, if any,
- d) Subject of request,

If the Data Subject submits his request to our Bank, Bank will complete the request as soon as possible and within 30 (thirty) days at the latest by the nature of the request. However, if the transaction requires an additional cost, the Bank may charge the tariff determined by the Personal Data Protection Board by the Bank.

It is not possible for third parties to make a request on behalf of Data Subjects. If any person other than the Data Subject is required to do so, the Personal Data Owner must have a special authorized power of attorney issued on behalf of the applicant.

Pursuant to Article 14 of the LPPD, in case the application is rejected, the answer is insufficient or the application has not been responded to, the Data Subject can file a complaint within 30 (thirty) days from the date of learning of the Bank's response and in any case within 60 (sixty) days from the date of application make a complaint.

Applications may be submitted at any branch of our Bank, or through the "Contact Us" page on our website by selecting "Request" as the reason for contact and "Law on Personal Data Protection (LPPD)" as the subject. Application page: <https://www.odeabank.com.tr/en/contact-us>

### Appendix-1: Data Subject Category

Data Subject Category
Customers (Eg. Real Person Customer, Contact customer, Proxy / Guardian / Trustee)
Potential Customer
Clients' Guarantees (eg 3rd Party with Guarantee / Surety)
Employees (Eg: Bank Staff, Outsource Staff, Intern)
Pensioners / Employees (Eg. Employees)
Candidates (eg Candidate Candidate, Trainee Candidate)
Partner (Eg: 3rd party firm employee)
Visitors (Eg: Press, GM, Visitor of the Branch, Campaign / Contest Participant)
Authorized Person of Public Institutions & Organizations
Other 3rd Persons (Eg: Accountant)

### Appendix-2: Main Purposes and Subordinate Purposes

Main Purposes	Subordinate Purposes
<p>Providing the planning and execution of human resources policies and processes of our Bank</p>	<p>Planning and / or executing the start-up and / or personnel processes of employees, Planning and / or executing the application, selection and evaluation processes of employee candidates, Planning and / or execution of internship and / or student procurement, placement and operation processes, Internal / external communication activities necessary for the placement of the working candidate and / or student and / or trainee, Planning and / or execution of reference and / or intelligence activities for personnel procurement and / or Bank security processes, To fulfill the obligations arising from the employment contract and / or legislation for the Bank's employees, Planning and / or execution of internal orientation activities, Planning and / or execution of personnel assignment / promotion processes, Planning and / or execution of talent / career development activities, Planning and / or execution of activities to be carried out within the framework of occupational health and / or safety, Planning and / or executing performance evaluation processes of employees, Monitoring and / or monitoring of employees' business activities, Planning and / or executing human resources processes, Planning and / or execution of internal training activities, Planning and / or execution of benefits and / or benefits for employees, Planning and / or execution of employee satisfaction and / or loyalty processes, Planning and / or executing the processes for taking and evaluating recommendations for the improvement of the work processes of employees, Planning and / or executing the activities of corporate social responsibility and / or non-governmental organizations to which employees participate, Expat / Planning and / or execution of overseas assignment processes, Planning and / or execution of foreign personnel work and / or residence permit procedures, Planning and / or execution of employees 'remuneration, Planning and / or execution of employees' exit transactions, Planning and / or execution of any activity related to the foundation before retirement and during retirement</p>
<p>Provision of legal, technical and commercial-occupational safety of the persons who are in contact with the Bank and of our Bank</p>	<p>Planning and / or execution of emergency and / or event management processes, Establishment and / or monitoring of visitor records, Provision of security of bank premises and / or facilities, Security of bank assets and / or resources, Compliance with the Bank procedures and / or relevant legislation the planning and / or execution of the operational activities necessary for the execution of the Company, the realization of the transactions of the companies and the partnership law, the planning and / or execution of the intelligence activities within the scope of the evaluation and / or collection processes related to the allocation of credit and / or other products / services, Providing information to the authorized persons and / or institutions on the legislation, the implementation of compliance processes in accordance with the foreign legislation, ensuring that the data is correct and / or up-to-date, planning and / or execution</p>

	<p>of the Bank's financial risk processes, Presentation Planning and / or execution of risk management processes related to products and / or services, management and / or supervision of relations with subsidiaries, planning and / or execution of relations with main shareholders, ensuring security of bank operations, planning of audit and / or ethical activities of the Bank planning and / or executing the necessary operational activities for unethical conduct and / or misconduct regarding employees, planning and / or executing internal audit / internal control / investigation / intelligence activities upon complaint or ex officio.</p>
<p>Planning and implementation of the activities and services required by the Bank for the promotion of the products and services offered by our Bank according to the tastes, usage habits and needs of the persons concerned.</p>	<p>Planning and / or execution of market research activities for the sales and / or marketing of products and services, The planning and / or execution of the processes of creating and / or increasing loyalty to the products and / or services offered by our Bank, Planning and / or execution of marketing processes of products and / or services, Planning and / or execution of activities related to customer satisfaction and / or experience, Planning and / or execution of the campaign and / or promotion and / or promotion processes, Determining and / or evaluating the people who will be subject to marketing activities according to the criteria of consumer behavior, Design and / or execution of personalized marketing and / or promotional activities, Design and / or execution of advertising and / or promotional and / or marketing activities in digital and / or other media, Designing and / or executing activities to be developed on customer acquisition and / or value creation in existing customers in digital and / or other channels; Planning and / or execution of data analytics for marketing purposes</p>
<p>Carrying out the work required by our business units and carrying out the relevant work processes to benefit the people from the products and services offered by our Bank</p>	<p>Monitoring of payment transactions of credit and / or other products / services, Follow-up of contract processes and / or legal requests, Creation and / or follow-up of the lending process, Creation and / or follow-up of the loan application process, Establishment and / or follow-up of credit evaluation and / or allocation process, Establishment and / or follow-up of the customer's insurance process, Planning and / or execution of sales processes of products and / or services, Establishment and / or follow-up of application processes of products and / or services, Establishing and / or monitoring the allocation and / or evaluation processes of products and / or services, Creation and / or follow-up of the use of products and / or services, Planning and / or executing the processes of providing the instruments and / or information to the customer in accordance with the channels to be used by the customer in the access and / or use of the products and / or services, Planning and / or executing customer relationship management processes, Planning and / or execution of after-sales support services activities, Implementation of activation processes of products and / or services, planning and / or executing cross-selling activities related to other products offered by our Bank, Planning and / or executing the sales activities of the products and / or services offered by the Bank's subsidiaries, Monitoring of customer requests and / or complaints, Planning and / or execution of business activities</p>
<p>Carrying out the necessary work by our business units and carrying out the related business processes for the realization of</p>	<p>Planning and / or execution of business activities, Planning and / or executing corporate communication activities, Planning and / or execution of supply chain management processes, Planning and / or execution of operations and / or efficiency processes, Planning, auditing</p>

commercial and / or operational activities carried out by our Bank	and / or executing information security processes, Creating and / or managing the information technology infrastructure, Planning and / or executing the access rights of the partners and / or suppliers to the information, Monitoring of financial and / or accounting works, planning and / or executing corporate sustainability activities, Planning and / or execution of activities for the realization of efficiency / productivity and / or appropriateness analysis of business activities, Planning and / or execution of corporate governance activities, Planning and / or execution of business continuity activities, Planning and / or execution of logistics activities, Planning and / or monitoring of construction and / or construction works, Planning and / or execution of procurement processes, Planning and / or execution of investment processes, Planning and / or execution of social responsibility and / or civil society activities, Planning and / or execution of sponsorship activities, Planning and / or execution of printed and / or visual or auditory communication activities to be shared with internal and / or external stakeholders,
Planning and / or execution of commercial and / or business strategies of the Bank.	Management of relations with business partners and / or suppliers, Implementation of strategic planning activities, Budget work and / or execution

### Appendix-3: Personal Data Categories

#	Personal Data Categories	Personal Data
1	Identity Information	E.g.: Name-Surname, T.R. Identity Number, T.R. Identity Card/Birth Certificate Serial / Series No, Passport Number, Photograph, Place of Birth, Date of Birth, Age, Copy/Image of T.R. Identity Card/Birth Certificate, Copy/Image of Driver's Permit/Driver's License, Copy/Image of Passport, Blood Group, Gender, Father Name, Mother Name, Marital Status, Signature
2	Communication information	Eg: E-Mail, Phone No, Mobile Phone Number, Address, Residence, ADNKS records
3	Location Data	Eg: Mobile App's Location Information (GPS)
4	Customer Information	Eg: Customer ID, Customer Income Information, Customer Professionals, License Plate, Information about the Vehicle, Training Information
5	Family Members and Relative Information	Eg: Data Subject's Children, wife-related ID, Wife Contact Information
6	Customer Transaction Information	Eg: Customer Credit Card Statement, Customer Receipts, Customer Instructions, Customer Instructions Records, Customer Online Activity Information
7	Physical Area Safety Information	Eg: Building Input Output Logs, Visit Information, Camera Records

#	Personal Data Categories	Personal Data
8	Process Security Information	Eg: Authentication Information (Password, Token, etc.)
9	Risk Management Information	Eg: KKB / FİNDEKS Query and Records, Address Record System Records, IP Address Tracking, Mac ID
10	Financial Information	Eg: Financial Transaction Information, Credit Card Debt, Loan Amount, Credit Payments,
11	Personal Information	Eg: Salary Information, SGK Premiums, Employee Training Information (Diploma)
12	Employee Candidate Information	Eg: Job Application Forms, Job Interviews and Evaluations, CVs,
13	Employee Transaction Information	Eg: Entry-Exit Records, Mail Traffic Tracking Information, Vehicle Usage Information, Starting Date, Military Status, Permission Request Information, Travel Requests, Visa Articles, Traffic Penalty Information, Appointment / Promotion Information
14	Employee Performance and Career Development Information	Eg: Training Commitment / Compulsory Service Certificate, Performance Evaluation Reports, Performance Evaluation Interviews Results, Performance Evaluation Tests, Activities and Courses Participated by Employees for Career Development
15	Benefits Information	Eg: Employee Benefits, Monitoring and Measurement of KPIs
16	Legal and Compliance Information	Eg: Legal Tracking Information
17	Audit and Inspection Information	Eg: Audit and Inspection Records and Reports
18	Personal Data of Special Nature	Eg: Race, Ethnic Origin, Political Thought, Philosophical Faith, Religious, Sect or Other Beliefs, Costumes and Attire, Association, Foundation or Trade Union Membership, Health Information, Sexual Life / Sexual Preference, Criminal Conviction and Security Measures

#	Personal Data Categories	Personal Data
19	Marketing Information	Eg: The Habits of the Person to be Marketing, The Hobbies of the Person to be Marketing, The Reports and Evaluations that Show the Likes of the People to be Marketing
20	Claims / Complaints Management Information	Eg: Information and Records Regarding the Complaints Person Made About Products and Services
21	Reputation Management Information	Eg: Complaints Received by the Internet and Social Media
22	Event Management Information	Eg: Information Collected on Company-Company Employees-Events That Have a Impact on the Company's Shareholders

#### Appendix-4 Recording Environments

Recording Environments	Non-Electronic Environments
Servers (Banking Systems, backup centers, e-mails, database, web site, public folder fields, etc.)	Paper (files, forms, documents, (contracts, application forms, documents of the information provided)
Software (Banking Systems, office software, portal)	Manual data logging systems
Information security tools (firewall, intrusion detection and blocking, log file, antivirus, etc.)	Printed, visual media
Internal memory of computers (Desktop, notebook)	
Mobile devices (telephone, tablet, etc.)	
Optical and removable discs (CD, DVD, USB Memory Card, etc.)	