



**TEB YATIRIM**  
BNP PARIBAS ORTAKLIĐI

**TEB YATIRIM MENKUL DEĐERLER A.Ő.**  
**PERSONAL DATA PROTECTION AND**  
**PRIVACY POLICY**



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## 1 PURPOSE

TEB Yatırım Menkul Değerler A.Ş. ("TEB Yatırım") is processing in strict compliance with pertinent laws the personal data of its customers, guarantors, suppliers, employees, applicants for employment, visitors and other natural persons entering into any relations with it for any other purpose or motive or through any channels whatsoever they are for the sake of performance of its business activities and operations.

The purpose of TEB Yatırım Menkul Değerler A.Ş. Personal Data Protection and Privacy Policy is to inform the related persons through descriptions and statements about its current personal data processing activities and the relevant systems, thereby ensuring transparency about its personal data related applications.

In this context, TEB Yatırım details and sets down in this Policy its activities regarding processing of personal data under and as per the Personal Data Protection Law no. 6698 ("KVKK"), and owners of data covered by this processing, and rights of data owners, together with use of cookies and similar technologies.

## 2 SCOPE

This Policy has been prepared in order to describe the body of rules pertaining to processing of personal data, thereby keeping the related persons informed thereabout, and has been approved by TEB Yatırım management, and become effective as of 06.09.2019.

## 3 DEFINITIONS

- Personal data:** Refers to all kinds of data and information pertaining to identified or identifiable natural persons.
- Specific personal data:** Refers to data regarding race, ethnical origin, political thoughts, philosophical belief, religion, sect or other beliefs, or association, foundation or union membership, or health, sexual life, criminal convictions and security measures, as well as biometrical and genetic data.
- Explicit consent:** Refers to a declaration of consent made with free will and own volition on a certain subject, and relied upon tangible information thereon.



- Anonymization:** Refers to the act of making personal data non-associable and non-relatable with any identified or identifiable natural person by any means or ways whatsoever, even through matching with other data.
- Processing of personal data:** Refers to all kinds of actions taken and executed on personal data, such as obtaining, recording, storage, safeguarding, safekeeping, modification, rearrangement, disclosure, transfer, acquisition, making acquirable, classification, or prevention of use, of data through fully or partially automatic ways or through non-automatic ways and methods, providing that they are a part of any data recording system. All kinds and types of actions taken on data starting from the first acquisition of data are covered by this term in all aspects.
- Personal data owner:** Refers to a natural person whose personal data is processed as cited hereinabove.
- Data recording system:** Refers to a recording system wherein personal data is structured, organized and processed according to certain criteria.
- Data supervisor:** Refers to a natural person or a legal entity who determines the means and purposes of processing of personal data, and is in charge of establishment and management of data recording system.
- Data processor:** Refers to a natural person or a legal entity processing personal data for and on behalf of data supervisor and in reliance upon an authorization vested in it by the latter.
- KVKK:** Refers to and stands for the Personal Data Protection Law no. 6698 dated 24 March 2016, as promulgated in the Official Gazette edition 29677 on 7 April 2016.
- Board:** Refers to and stands for Personal Data Protection Board.
- Authority:** Refers to and stands for Personal Data Protection Authority.
- Policy:** Refers to and stands for this TEB Yatırım Menkul Değerler A.Ş. Personal Data Protection and Privacy Policy.



## 4 PERSONAL DATA

### 4.1 General Principles on Processing of Personal Data

TEB Yatırım is processing personal data in accordance with the following principles and for the purposes described with examples thereof in “**Purposes of Processing of Personal Data**” section of this Policy and pursuant to the provisions of 2<sup>nd</sup> paragraph of Article 4 of KVKK:

- Compliance with laws and rules of good faith and honesty
- Being accurate and if needed, current and updated
- Processing for certain, explicit and legitimate purposes
- Being associated and related with, limited and proportional to, the purpose of processing
- Storing and keeping only for a duration as specified in the applicable laws and regulations or as required for the purpose of processing

### 4.2 Data Processed by TEB Yatırım

Personal data are processed by TEB Yatırım either in reliance upon explicit consent taking from data owners or in the case of circumstances or events allowing processing of personal data without any explicit consent pursuant to and in reliance upon articles 5 and 6 of KVKK, and such data are processed and treated only within the frame of the purposes described with examples thereof in “**Purposes of Processing of Personal Data**” section of this Policy. Types of such personal data which diversify and differ depending upon the type and nature of relations between TEB Yatırım and data owner, and the communication channels used therein, and the aforementioned purposes, and are processed in conformity with the principles cited in this Policy are as listed and enumerated below:

- Information introducing the data owner, such as first name and surname, profession, job title, working life, education status, gender, marital status, wife/husband and children, citizenship, military duty, criminal conviction records, and tax liability status, etc.,
- Such data as date of birth, place of birth, identity number, blood group, religion and personal photo available in identity documents, including, but not limited to, identity document or card photocopy, certified copy of birth certificate, passport and driving license,



- Communication records and other voice data covered by telephone conversations and electronic mail correspondences, together with such communication data as address, electronic mail, telephone and facsimile numbers,
- Natural person data in identification documents of legal entities such as tax chart, trade registry gazette editions, certificate of authorization, certificates of competence, signature circular and activity certificate,
- Detailed financial information and data with regard to pricing, account reconciliation, collection and payment activities.

#### **4.3 Purposes of Processing of Personal Data**

Personal data can be processed by TEB Yatırım solely for and within the frame of the following purposes, and can be kept and stored only for the durations required by the aforementioned purposes and specified in the applicable laws and regulations:

- Performance by the relevant business units of the works and activities needed in order to enable the customers to make benefit from the products and services offered by TEB Yatırım, and
- Planning and performance of corporate sustainability activities, and
- Supporting the group companies in conduct of their companies and partnership law deals and transactions, and
- Legal and commercial security of both TEB Yatırım and all and any third parties having a kind of business relations with TEB Yatırım, and
- Conduct of commercial activities with a view to formulating and applying commercial and business strategies of TEB Yatırım.

#### **4.4 Transfer of Personal Data**

TEB Yatırım is dealing with local and foreign data transfers within the frame of the purposes described with examples thereof in “**Purposes of Processing of Personal Data**” section of this Policy and pursuant to and in reliance upon articles 8 and 9 of KVKK, and accordingly, personal data can be processed and stored in servers and other electronic media employed to this end. Nature of these transfers and the parties to whom data are transferred vary depending upon the kind and description of relations between data owner and TEB Yatırım, and purposes underlying the transfer, and the relevant legal grounds, and these parties are generally as listed below:

- Third party service providers seated at home or abroad, and



- Direct and indirect shareholders, subsidiaries and affiliates, and
- Business partners having a contract with TEB Yatırım.

#### **4.5 Collection of Personal Data**

For the sake of achievement of the objectives described with examples thereof in “**Purposes of Processing of Personal Data**” section of this Policy, TEB Yatırım may acquire data directly from its employees, customers, suppliers, business partners, group companies, call center and official authorities and governmental bodies under the terms and conditions specified in articles 5 and 6 of KVKK, and may also collect personal data through internet sites, social media and other public channels or training events, organizations and similar other activities.

#### **4.6 Period of Storage of Personal Data**

Personal data are kept in TEB Yatırım only by the end of the relevant legal storage periods, and are stored throughout the period of time needed for completion of the activities relating to such data and for achievement of the objectives described in this Policy. Personal data whose purpose of use is terminated, or legal period of storage is expired are deleted, destroyed or anonymized by TEB Yatırım under and pursuant to article 7 of KVKK.

#### **4.7 Rights of Data Owner Within the Frame of KVKK**

Article 11 of KVKK deals with rights of natural persons whose personal data are processed, and according to that article, data owners have the following rights:

- To learn whether his personal data are processed or not, and
- If his personal data are processed, to request information thereabout, and
- To learn the purpose of processing of personal data, and whether they are used for their intended purposes or not, and
- To learn identity of third parties to whom his personal data are transferred at home or abroad, and
- If his personal data are processed incompletely or inaccurately, to request correction or completion of them, as the case may be, and
- If and when the reasons justifying processing of personal data disappear, to request deletion or destruction of such personal data, and
- To request that the correction and deletion acts mentioned hereinabove are duly reported to third parties to whom his personal data are transferred, and



- To raise objections against probable outcomes that may be derived to the detriment of him through analysis of the processed data solely by using automatic systems, and
- To claim compensation of his damages and losses, if any, caused by illegal and unlawful processing of his personal data.

Any requests or claims arising out of the rights listed above may either be delivered by hand or be delivered via a notary public, together with a petition of the relevant person, to the address of **“TEB Kampüs D Blok Saray Mahallesi Sokullu Caddesi No:7B Ümraniye 34768 İSTANBUL”**. In addition, applications may be transmitted to our Company’s registered electronic mail address [tebyatirimmenkuldegerler@hs03.kep.tr](mailto:tebyatirimmenkuldegerler@hs03.kep.tr) with “secure electronic signature” as described in the Electronic Signature Law no. 5070, mobile signature or in writing or to the address of [kvkk-basvuru@tebyatirim.com.tr](mailto:kvkk-basvuru@tebyatirim.com.tr) by using the electronic mail address registered in the system and previously designated to our Company, pursuant to the provisions of article 5 of the “Communiqué on Procedures and Principles of Application to Data Supervisor”. ([Please click the Sample Form For Use of Rights Regarding Personal Data.](#))

#### **4.8 Data Transfer to Abroad**

For processing, storage or other purposes of use as described in this Policy, and within the frame of the purposes described with examples thereof in **“Purposes of Processing of Personal Data”** section of this Policy, personal data may be transferred abroad in compliance with the applicable laws and regulations and for the sake of outcomes listed under Heading 4.4 of this Policy. During such transfers, all actions and measures are taken as required for protection of personal data as desired.

#### **4.9 Security of Personal Data**

TEB Yatırım attaches great importance to protection of privacy and security of personal data. To this end, all technical and administrative security measures and actions are taken in order to protect personal data against unauthorized access, damages, losses or disclosure. To this end, all of the required systematic access controls, data access controls, secure transfer controls, business continuity controls and other needed corporate controls are applied.

##### **4.9.1 Administrative Measures for Security of Personal Data**

TEB Yatırım makes use of “Personal Data Inventory” to determine and identify the actions and measures required for security of personal data processed by it.





TEB Yatırım applies awareness training on its employees with respect to protection of personal data, and regularly repeats these training courses.

TEB Yatırım keeps all of its policies and procedures issued in connection therewith current and updated in the course of its business operations and in line with the applicable laws and regulations.

In accordance with its Deletion, Destruction and Anonymization Policy, TEB Yatırım tries to reduce the processed personal data as far as possible, and deletes, destroys or anonymizes all kinds of personal data which are no more functional or current or the accuracy of which can no more be confirmed.

TEB Yatırım bases its contractual relations with third parties acting in the status of “Data Processor” on the principle of protection of personal data.

#### **4.9.2 Technical Measures for Security of Personal Data**

TEB Yatırım takes all kinds of actions and measures for cyber security as a part of feasible technical measures. Within this frame:

- All of the security products owned by TEB Yatırım are kept current,
- Access and authorization management are regularly controlled,
- Employees are kept informed about the use of password,
- TEB Yatırım regularly reviews and scans its own networks and computers, and makes sure of currency and updates its security software programs used for review and scanning,
- In case of use of internet websites outside the network under control of TEB Yatırım in the course of collection of personal data, TEB Yatırım makes sure that the links to the websites are made by SSL or a more secure way or method.

## **5 COOKIES AND SIMILAR OTHER TECHNOLOGIES**

### **5.1 General**

Small text and data files sent by internet network server to devices of users through internet browser employed therein for are termed and called as cookies, and internet websites become more easily accessible by users through these cookies, and life of cookies differs depending upon the browser settings,



These cookies may be produced and generated not only through systems under management of TEB Yatırım, but also by some service providers specifically authorized by TEB Yatırım. Cookies may acquire IP address, unique identifier and device identifier information. Furthermore, though links belonging to third parties included in TEB Yatırım systems are subject to privacy policies of these third parties, TEB Yatırım does not assume or accept any liability for such privacy applications, and accordingly, when a website covered by the relevant link is visited, the privacy policy of said website is suggested to be read.

## 5.2 Types of Cookies

Cookies the main purpose of use is to provide convenience to users are categorized in 4 main groups:

- i. **Session Cookies:** They are cookies enabling the user to make benefit from various different properties such as carriage of information among internet pages and systematic remembrance of information and data entered by the users, and are essentially required for smooth operation of the functions of TEB Yatırım internet site.
- ii. **Performance Cookies:** These are cookies collecting information on visiting frequency of pages, probable error messages, total time spent by users in the relevant page, and designs and patterns of co-use of site, and are used with a view to enhancing performance of TEB Yatırım internet site.
- iii. **Functional Cookies:** These are cookies acting as reminder of pre-selected options for the sake of convenience of users, and aim to provide developed internet properties to users through TEB Yatırım internet site.
- iv. **Advertisement and Third Party Cookies:** These are cookies belonging to third party suppliers, and enable the use of some functions in and the follow-up of advertisements via TEB Yatırım internet site.

## 5.3 Purposes of Use of Cookies

Purposes of use of cookies being employed by TEB Yatırım are as listed and described below:

- i. **Operational purpose uses:** TEB Yatırım may, for the sake of administration and security of its systems, use cookies making it possible to make benefit from functions in this site or detecting irregular acts and behaviors.



- ii. **Functional purpose uses:** TEB Yatırım may use cookies reminding information about and past choices and preferences of users, with a view to facilitating the use of its systems and providing user-specific use properties.
- iii. **Performance purpose uses:** TEB Yatırım may, for the purpose of enhancement and measurement of performance of its systems, use cookies assessing and analyzing the interaction with the messages sent, and the user behaviors.
- iv. **Advertisement purpose uses:** TEB Yatırım may, in order to send advertisements and similar other contents to users in tandem with their areas of interest through systems owned by itself or by third parties, use cookies measuring efficiency of these advertisements or analyzing the click rate.

#### **5.4 Deactivation of Cookies**

Use of cookies is already preset, selected and available in many browsers, and users may change this selection through browser settings, and thus, may delete the existing cookies and refuse the future use of cookies. However, in the event of cancellation of use of cookies, the user may not be able to make benefit from some properties in TEB Yatırım systems.

Method for change of cookie use selection varies depending on the type of browser, and may be learned from the relevant service provider at any time.

### **6 EFFECTIVE DATE AND SUPERVISION**

This Policy shall become effective as of the date it is approved by the Company's Board of Directors. Revisions and amendments to be made in this Policy shall become effective after they are approved by the Company's General Manager. The Policy is normally reviewed and updated once a year. However, the Company hereby reserves and retains its right to review this Policy and if and when needed, to update, amend, revise or terminate the Policy and draft a new policy in line with changes of law, or modifications in a technical standard referred to herein, or actions and/or decisions taken by the Personal Data Protection Board, and court judgments or rulings in connection herewith. It is in the sole discretion of the Company's Board of Directors to take decisions as to termination of this Policy.

### **7 REVISIONS AND AMENDMENTS**

Revisions and amendments to be made in this Policy if and when secondary regulations covered by the Law are put into force or at various different times may be followed up through TEB Yatırım's corporate internet site, and the revised version of this Policy may be accessed again from this corporate website.