



Yapı Kredi Yatırım Menkul Değerler Anonim Şirketi Customer Clarification Text on the Protection and Processing of Personal Data ("Clarification Text")

a) Data Controller

Pursuant to the Law No. 6698 on the Protection of Personal Data (the "Law") your personal data may be processed within the following scope by Yapı Kredi Yatırım Menkul Değerler Anonim Şirketi (the "Company") as the data controller.

b) Method of Collecting Personal Data

Your personal data is collected for the purposes described above, either electronically and/or physically, by our Company through our websites, e-mail, questionnaire, mail, telephone, mobile application and similar channels. Your personal data collected for these legal purposes may also be processed and transmitted for the purposes set out in articles (c) and (d) of this Clarification Text within the framework of personal data processing requirements and purposes laid down in Articles 5 and 6 of the Law.

c) Categories of Data Processed and Legal Reason and Purpose of Personal Data Processing

Your personal data are processed by our company for following purposes and legal reasons.

Data Categories	Processing Purposes	Legal Reasons
<input type="checkbox"/> ID, Contact, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, Visual and Audio Records, Information on Family Members and Relatives	<input type="checkbox"/> Opening an Investment Account, <input type="checkbox"/> Management of processes intended for capital market instruments and provision of investment services in a capacity as transaction broker and portfolio broker,	<input type="checkbox"/> When it is directly related to the execution or performance of the contract <input type="checkbox"/> When it is mandatory for the data controller to fulfill her/his legal obligation, <input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced
<input type="checkbox"/> Identity, Contact, Professional Experience, Customer Transaction, Visual and Audio Recordings	<input type="checkbox"/> Knowing the customer, identification and identity confirmation, <input type="checkbox"/> Ensuring that customer information is accurate, complete and up-to-date	<input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> When it is clearly stipulated in laws
<input type="checkbox"/> Identity, Contact, Customer Transaction, Legal Action and Compliance Information	<input type="checkbox"/> Conducting the collateralization process	<input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> When data processing is mandatory for the establishment, exercise or protection of any right
<input type="checkbox"/> ID, Contact, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information, Legal Action and Compliance Information, Information on Family Members and Relatives	<input type="checkbox"/> Carrying out operations in accordance with the legislation	<input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced





<input type="checkbox"/> ID, Contact, Legal Action and Compliance, Transaction Security, Information on Family Members and Relatives	<input type="checkbox"/> Conducting our contract processes	<input type="checkbox"/> When it is directly related to the execution or performance of the contract <input type="checkbox"/> When it is mandatory for us to fulfill our legal obligation, <input type="checkbox"/> When it is clearly stipulated in laws
<input type="checkbox"/> ID, Contact, Location, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, marketing, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information, Legal Action and Compliance Information	<input type="checkbox"/> Receiving and evaluating suggestions for improving business processes, conducting analyses.	<input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced <input type="checkbox"/> When it is mandatory for the data controller to fulfill her/his legal obligation,
<input type="checkbox"/> ID, Contact, Customer Transaction, Transaction Security, Risk Management, Finance, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information,	<input type="checkbox"/> Realization of infrastructure, maintenance-repair as well as analysis and development processes of the company's systems <input type="checkbox"/> Conducting user test processes and reporting of tests <input type="checkbox"/> Conducting our company's information systems and transaction security processes <input type="checkbox"/> Assuring the company's operation security	<input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced <input type="checkbox"/> When it is mandatory for the data controller to fulfill her/his legal obligation,
<input type="checkbox"/> Identity, Contact, Customer Transaction, Visual and Audio Records	<input type="checkbox"/> Realization of corporate communication and event activities <input type="checkbox"/> Conducting customer satisfaction and experience, questionnaire and analysis studies	<input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced <input type="checkbox"/> When you give your explicit consent
<input type="checkbox"/> ID, Contact, Location, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, marketing, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information, Legal Action and Compliance Information	<input type="checkbox"/> Conducting storage and archiving activities	<input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> When it is clearly stipulated in laws <input type="checkbox"/> Data processing is mandatory for the establishment, exercise or protection of any right
<input type="checkbox"/> Identity, Contact, Customer Transaction, Finance	<input type="checkbox"/> Carrying out finance and accounting transactions,	<input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> When it is clearly stipulated in laws <input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your





		fundamental rights and freedoms are not prejudiced
<input type="checkbox"/> ID, Contact, Location, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, marketing, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information, Legal Action and Compliance Information, Information on Family Members and Relatives	<input type="checkbox"/> Following-up and Carrying out Legal Affairs <input type="checkbox"/> Providing authorized persons, institutions and organizations, (CMB, TSPB (Turkish Capital Markets Association), CRA, MASAK, Takasbank, Courts, etc.) with information, issuance of reports within scope of legal arrangements and legislation	<input type="checkbox"/> Data processing is mandatory for the establishment, exercise or protection of any right <input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced <input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> When it is clearly stipulated in laws
<input type="checkbox"/> ID, Contact, Customer Transaction, Risk Management, Finance, Visual and Audio Records, Legal Action and Compliance Information	<input type="checkbox"/> Collection, administrative or legal proceedings for our company's receivables	<input type="checkbox"/> Data processing is mandatory for the establishment, exercise or protection of any right <input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced <input type="checkbox"/> When it is mandatory for the Company to fulfill legal obligations, <input type="checkbox"/> When it is clearly stipulated in laws
<input type="checkbox"/> Finance, Communication, Identity, Professional Experience, Customer Transaction, Marketing	<input type="checkbox"/> Segment work being undertaken with a view to determining customer service standard and determination of products to be provided in connection therewith <input type="checkbox"/> Determination or development of strategies intended to present products and services	<input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced
<input type="checkbox"/> ID, Contact, Location, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information, Legal Action and Compliance Information	<input type="checkbox"/> Conducting risk management and internal audit activities	<input type="checkbox"/> It is mandatory for us to fulfill our legal obligation <input type="checkbox"/> When it is clearly stipulated in laws
<input type="checkbox"/> ID, Contact, Customer Transaction, Professional Experience, Risk Management, Finance, Location, Information on Family Members and Relatives	<input type="checkbox"/> Conducting our contract processes <input type="checkbox"/> Establishing loyalty towards our products or services, <input type="checkbox"/> Execution of cross-sales, marketing and advertising/promotional activities	<input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced <input type="checkbox"/> When you give your explicit consent



	<input type="checkbox"/> in digital and/or other media <input type="checkbox"/> Organization of campaigns or promotions <input type="checkbox"/> Undertaking of data analytics and modeling works <input type="checkbox"/> Promotion of products and services which are provided by and/or in cooperation with the Company's parent / organizations the Company cooperates with, conducting marketing activities, increasing customer satisfaction and engagement	
<input type="checkbox"/> ID, Contact, Customer Transaction, Professional Experience, Risk Management, Finance, Location, Information on Family Members and Relatives	<input type="checkbox"/> Execution of our marketing activities customized to individuals (Profiling, targeting, etc..) and promotional activities	<input type="checkbox"/> When you give your explicit consent
<input type="checkbox"/> ID, Contact, Customer Transaction, Transaction Security, Professional Experience, Risk Management, Finance, marketing, Visual and Audio Records, Demand and Complaint Management Information, Audit and Inspection Information, Legal Action and Compliance Information, Information on Family Members and Relatives	<input type="checkbox"/> Provision of products and services which are provided by and/or in cooperation with the Company's parent / organizations the Company cooperates with and running operational processes	<input type="checkbox"/> When it is directly related to the execution or performance of the contract <input type="checkbox"/> It is mandatory for us to fulfill our legal obligation <input type="checkbox"/> When it is clearly stipulated in laws <input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced

d) Persons to Whom and Purposes for Which Personal Data can be Transmitted

Your personal data are transferred to following parties for the following purposes and legal reasons:

Persons/Institutions to whom personal data are transferred	Our Purposes of Transfer	Legal Reasons
<input type="checkbox"/> Domestic banks <i>(Mean domestic Banks with which the Company cooperates for the purpose of selling its products and services)</i>	<input type="checkbox"/> Ability to provide products and services demanded from our company, and fulfilling requirements of contracts, demands and instructions entered into by you and our Company	<input type="checkbox"/> When it is directly related to the execution or performance of the contract <input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced
<input type="checkbox"/> Our Affiliates and organizations acting s intermediary for our operations (ACCRUEDs per CMB legislation, organizations acting as intermediary of our transactions)	<input type="checkbox"/> Fulfilling legal obligations, ability to render our Company's services, <input type="checkbox"/> Ability to provide products and services you request from our Company,	<input type="checkbox"/> When it is clearly stipulated in laws <input type="checkbox"/> It is mandatory for us to fulfill our legal obligation





mean companies of which the Company is a direct shareholder.)	Fulfilling requirements of contracts, demands and instructions entered into by you and our Company	<input type="checkbox"/> When it is directly related to the execution or performance of the contract <input type="checkbox"/> It is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced
<input type="checkbox"/> Suppliers (Mean all 3rd party service providers from whom goods and services are purchased such as support organizations, external service providers, law firms, parties from which we receive consultancy, courier companies in order for services to be rendered and our operations to be run within framework of Capital Market Law.)	<input type="checkbox"/> Ability of parties from which services are taken to provide our Company with support and advisory service	<input type="checkbox"/> When it is mandatory to process your personal data for our legitimate interests, provided that your fundamental rights and freedoms are not prejudiced
Financial Group Companies (Mean financial group companies whose parent company is Koç Holding A.Ş., which were brought to together under the roof of Yapı ve Kredi Bankası Financial Group, as founded under Law no. 5549.)	<input type="checkbox"/> Fulfillment of our legal obligations	<input type="checkbox"/> When it is clearly stipulated in laws <input type="checkbox"/> It is mandatory for us to fulfill our legal obligation
<input type="checkbox"/> Legally Authorized Institutions and Organizations (Mean private and public institutions and authorized to demand information ad documents due to relevant legal arrangements or legal processes as well as private and public institutions and organizations to which information must be transferred as per legal arrangements and private and public institutions and organizations from which we receive information confirmation for the sake of security of information security. For example: CMB, TPSB (Turkish Capital Markets Association),	<input type="checkbox"/> Fulfillment of legal reporting and information demands, conducting legal audit activities, conducting legal processes, and meeting requirements of legislation	<input type="checkbox"/> When it is clearly stipulated in laws <input type="checkbox"/> It is mandatory for us to fulfill our legal obligation <input type="checkbox"/> When data processing is mandatory for the establishment, exercise or protection of any right





CRA, MASAK, GİB (Turkish Revenue Administration), SSI, judicial authorities, etc.)		
<input type="checkbox"/> Natural persons or private law legal entities should you place an instruction in our company	<input type="checkbox"/> Execution of your instructions	<input type="checkbox"/> When it is directly related to the execution or performance of the contract

e) Rights of the Personal Data Subject Listed under Article 11 of the Law

We hereby declare that you have the following rights regarding your personal data as per the Article 11 of the Law:

- ☐ To find out whether their personal data has been processed,
- ☐ To request information if their personal data are processed,
- ☐ To find out the reason for processing of the personal data and whether this has been used properly for that purpose,
- ☐ To be informed of the domestic or international third parties to which the personal data has been transferred,
- ☐ To request correction of your personal data, if they have been processed incompletely or incorrectly, and to ask for having the aforementioned third parties, to whom your personal data have been transferred, be notified of the process carried out in this respect;
- ☐ No matter if your personal data have been processed pursuant to the Law, or to other relevant legal provisions, to request for the deletion or destruction of your personal data if the reasons for the procession in question have ceased to exist, and to ask for having the aforementioned third parties, to whom your personal data have been transferred, be notified of the process carried out in this respect, and when personal data are processed incompletely or incorrectly;
- ☐ To object to the processing, exclusively by automatic means, of personal data, which leads to an unfavorable consequence for the data subject;
- ☐ To demand indemnification of losses you may incur due to illegal procession of your personal data;

You can send your application regarding your rights listed above by completing a Data Subject Application Form which is available at www.ykyatirim.com.tr. Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

