

TÜRKİYE HALK BANKASI A.Ş. MEMORANDUM ON PROTECTION AND PROCESSING OF PERSONAL DATA

As Türkiye Halk Bankası A.Ş. (Halkbank), in our capacity as “Data Controller”, we would like to inform you in accordance with the Personal Data Protection Law No. 6698 (Law), which was issued for the purpose of protecting individuals’ fundamental rights and freedoms, in particular, the right to privacy, and stipulating the obligations of natural persons and legal entities engaged in the processing of personal data.

The purpose of this memorandum is to provide you with the most accurate information regarding the purposes and the legal causes of processing of your personal data, and your rights.

Halkbank provides security at the highest possible level to make sure that your personal data is collected, stored, shared and its confidentiality ensured in accordance with the Law.

I. Processing of Personal Data and the Purpose of Processing

Your personal data is collected and processed by Halkbank within the scope of the principles set out in Article 4 and personal data processing requirements and purposes indicated in Articles 5 and 6 of the Law, as explained below;

- Fulfillment of our obligations imposed by legislation which our Bank is subject to, such as the Banking Law, the Law on Bank Cards and Credit Cards, the Law on Prevention of Laundering of Crime Revenues, Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions;
- Compliance with the informing and reporting obligations, if requested by such official, administrative authorities as Banking Regulation and Supervision Agency (“BRSA”), Merkezi Kayıt Kuruluşu A.Ş., Financial Crimes Investigation Board, Ministry of Finance, Kredi Kayıt Bürosu, the Central Bank of the Republic of Turkey and the Banks Association of Turkey, Undersecretariat of the Treasury;
- Assurance that the banking activities are carried out in accordance with the Bank’s procedures and/or the relevant legislation;
- The fulfillment of the requirements of the agreements executed with you as part of the contractual relationship;
- To be able to fulfill our obligations regarding knowing our customers as per the legislation to which we are subject, recording such information as, primarily, identity and address detection, profession, income, and purpose of trade in our Bank;
- Keeping records of notifications regarding complaints, objections, requests, suggestions and satisfaction under our notification management system to provide better service to you;
- Processing all records and documents which would be the basis of the transactions processed in electronic environments (via all service units and channels like SWIFT, internet/mobile banking, Head Office Departments, Branches, ATMs, online branches, call centers) or on paper;
- Usage in the products and services which we intermediate and may offer as agent, within the scope of the Banking Law and applicable legislation;
- Planning and execution of business activities and operational processes;
- Carrying out and performance of customer relations;
- Ensuring that your data is kept accurate and up-to-date;
- Provision of customer satisfaction and fulfillment of corporate communication activities;
- Evaluation of your demands and complaints made via Social Media and recommendation of solution;
- Planning and execution of promotional and advertising activities to increase volume;
- Planning and execution of marketing and sales activities personalized for you;
- The management of relationships and the execution of operations that our bank carries out through its service

units, affiliates and subsidiaries;

- Pursuing investigations and legal and execution proceedings to which our Bank is a party; procurement of legal advice;
- Planning, supervision and implementation of corporate sustainability, corporate governance, strategic planning and information security processes;
- Camera recordings of images in our Bank's service units and ATMs as part of our security procedures at our workplace and within the scope of our obligations generating from the Law.

In addition, our Bank may process your personal data in order to identify, monitor, report, and control the risk group in which you will be included for the purpose of determining lines of credit to be made available to a risk group in accordance with banking legislation even if you are not a customer of ours.

Partnerships where you, your spouse, children serve as a director or general manager or which is directly or indirectly controlled by them or a legal person with unlimited liability individually or collectively and partnerships which are individually or collectively and directly or indirectly controlled by a bank's qualified shareholders, directors and general manager or where they have unlimited liability or serve as a director or general manager and legal and natural persons who have surety, guarantee, or similar relations to such an extent that if one of them becomes insolvent, one or several others will also become insolvent constitute a risk group. In addition, other natural and real persons who will be involved in a risk group are identified by the Turkish Banking Regulating and Auditing Council.

II. Transfer of Personal Data and the Purpose of Transfer

Your personal data is shared with public authorities and other organizations, and may be subject to statutory reporting as part of the legal obligations of our Bank. Your personal data may be transferred to public legal entities and institutions such as the Merkezi Kayıt Kuruluşu A.Ş., Banking Supervision and Regulation Agency, Capital Markets Board, Revenue Administration, Tax Inspection Board, Banks Association of Turkey, Banks Association of Turkey Risk Center and Financial Crimes Investigation Board, Ministry of Finance, Kredi Kayıt Bürosu, Central Bank of the Republic of Turkey and, in case of a request, to other official and administrative authorities authorized by law to request customer information from banks, limited to the subject of the request, within the framework of the personal data processing conditions and purposes stated in Law No. 6698.

In addition, your personal data is shared for the purpose of the performance of the agreement you have executed with our Bank, to the extent required by our Bank applications and within the scope of legislation, with such financial institutions as third parties who provide us services in the execution of our banking activities, cooperating institutions, program partners, and affiliates and subsidiaries; and the financial institutions, domestic and international service units indicated in Article 73/4 of the Banking Law.

Furthermore, if your consent is available, it is also shared within the scope of your consent, with our subsidiaries, affiliates and other third parties to be able to provide you a better service, promote new products and services, and offer products and services personalized for you.

III. Collection of Personal Data and Legal Cause

Your personal data is automatically collected via the channels through which our Bank contacts or will contact with you and non-automatic methods provided that they are a part of the data storage system such as Halkbank Head Office, Regional Coordination Offices, Branches, ATMs, Internet branches, mobile or digital applications, social media, call center, the companies whose activities is carried out by our Bank in the capacity of intermediary/agency, customer communications, screening of judicial records, market intelligence, Identity Sharing System, Address Sharing System, Kredi Kayıt Bürosu, Interbank Card Center, written/digital applications

made on websites, written/digital applications made with sales teams, companies providing call center services, POS devices of member merchants and those member merchants.

As per the Banking Law, BRSA regulations and national and international legal regulations governing the banking sector, and in line with the banking services agreement you have executed with our Bank and other national and international legal regulations,

your personal data which is not classified as special personal data is processed if "it is expressly stipulated in the laws," or "processing of personal data pertaining to the parties of a contract if it is directly related to the execution or performance of a contract" or "it is required in order to enable the data controller to discharge its legal obligation" or "processing of data is required for establishing exercising or protecting a right" or "processing of data is required for the legitimate interests of the data controller provided that it is not prejudicial to fundamental rights and freedoms of the person concerned" as specified in Article 5 of the Law based on the foregoing legal reasons or "the person concerned has given his/her express consent" as stipulated in Article 5 of the Law if there is no such legal grounds;

Your special personal data except for those related to health and sexual life is processed if "it is expressly stipulated in the laws" as specified in Article 5 of the Law based on the foregoing legal reason or "the person concerned has given his/her express consent" as stipulated in Article 6 of the Law if there is no such legal grounds;

Your health information is processed if "it is expressly stipulated in the laws" as specified in Article 5 of the Law.

IV. Protection of Personal Data

Your personal data may be kept as long as the processing purposes require. In cases of the absence of any other grounds or legal cause, international law or regulation and the termination of the obligations generated from the agreement; your personal data, of which the processing purpose has come to an end is deleted, destroyed or anonymized.

V. Rights of Data Subject whose Personal Data has been Processed

As personal data owners, you may exercise your rights stated below related to the processing of your personal data by way of a request to our Bank. Halkbank will resolve your inquiries related to your rights, submitted via the below mentioned means, within the shortest time, and within maximum 30 days depending on the nature of your inquiry. Our response shall be free of charge up to ten pages. For every page over ten pages, a transaction fee of 1 Turkish Lira shall be charged. If the application is submitted on a recording medium such as a CD or a flash memory, the fee claimed by Halkbank shall not exceed the cost of the recording medium. If the Personal Data Protection Board makes changes to these charges, tariff announced by the Boards shall be applicable.

You, as the owner of the personal data, are entitled;

- To be informed whether or not personal data is being processed,
- To request information about the nature of the processing, if your personal data is used,
- To be informed about the purpose of personal data processing, and whether it is being used appropriately for the purpose,
- To be informed about third parties to whom personal data is being transferred in the country or abroad,
- To request the correction of personal data in case of incomplete or incorrect process, and to demand that these requests be communicated to third parties,
- To request the deletion or destruction of personal data if the processing reasons concluded, even if it has

been processed in accordance with the provisions of Law No. 6698 and the provisions of other related law; and to request that the operation that has been carried out in this context be communicated to third parties,

- To object to any consequence against him/herself that is obtained by means of analyzing the processed data exclusively through automatic systems,
- To request the recovery of damages in the event of loss due to the unlawful processing of personal data.

Your application should include the following:

- Your full name and your signature if the application is in writing,
- Your TR Identity Number for citizens of the Republic of Turkey; and if you are a foreigner, your nationality, passport number or identity number, if available,
- Your permanent residence address or business address to be used for notifications,
- Your permanent e-mail address, phone number and fax number, if any, for notices,
- The subject of your request is obligatory. Information and documents related to the subject (if any) must also be included in the application.

You may submit any applications you wish to make in writing to the Headquarters or the Branch Offices of our Bank, namely the data controller, by adding the necessary documents. You may access the application form at halkbank.com.tr

You may submit your applications by e-mail to hbkvk@halkbank.com.tr

You may submit your applications via KEP to our email address at halkbank.muhaberat@hs03.kep.tr

Information and documents regarding the nature of your request must be communicated to us completely and accurately. If the requested information and documents are not communicated as required, as the Bank we may suffer setbacks in execution of the complete and qualified research regarding your request. In this case, Halkbank declares that it reserves its legal rights. Therefore, your submitted application must be complete and contain the requested information and documents depending on the nature of your request.

Yours faithfully,

Türkiye Halk Bankası A.Ş.