

FİBABANKA ANONİM ŞİRKETİ
NOTIFICATION FOR SUB-MERCHANTS

We, Fibabanka Anonim Şirketi (“Fibabanka” or “Company”) acting as the data controller, exert utmost care and diligence for the processing and protection of personal data owned by the sub-merchants, in accordance with the Law No. 6698 on the Protection of Personal Data (“LPPD”) and its secondary regulations (“PDP legislation”). With this Notification, we would like to inform you about the personal data processing activities that our Company carries out with respect to the Sub-Merchants.

1. Your Processed Personal Data, Collection Methods, Processing Purposes and Legal Compliance Reasons

Your personal data as specified in the Table-1 below are collected and processed by our Company in connection with the assessment of the applications made by the Merchants for making Virtual POS available for use by the Sub-Merchant and performance of the Virtual POS transactions, through automated and non-automated means in physical or electronic environments, either electronically, verbally, or in writing, in a manner that is relevant, limited, and proportionate to the purposes listed in the Table-1 below, and in compliance with the principles of the LPPD and data protection legislation.

This Notification has been prepared so as to include the legal grounds stipulated by law as regards your processed personal data.

The personal data that will be processed by Fibabanka are as follows:

Table-1

Purposes for Processing	Personal Data	Legal Compliance Reasons
Conducting settlement and accounting processes	• Identity Details (name, surname) • Customer transaction details (transaction date, transaction description, transaction amount)	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç))
Conducting Chargeback & Dispute processes	• Identity Details (name, surname) • Customer transaction details (transaction date, transaction description, transaction amount, crediting details, debiting details)	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç))

Management of reporting processes	• Identity Details (name, surname) • Customer transaction details (transaction date, transaction description, transaction amount, spent amount, crediting details, debiting details) • Other (Sub-Merchant status, Sub-Merchant's name, vendor code, virtual POS number, MCC category code, BKM ID)	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç))
Assessment of the applications made with the Bank by the Merchant for making Virtual POS available for use by the Sub-Merchant and setup of Virtual POS infrastructure at the workplace of the Sub-Merchant whose request has been approved.	• Identity Details (name, surname, Turkish ID No, Tax ID No) • Contact details (address, zip code, e-mail address, phone number, province code) • Other (Sub-Merchant status, Sub-Merchant's name, vendor code, virtual POS number, MCC category code, BKM ID)	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç))

2. Transferring your Personal Data to Third Parties

Your personal data mentioned above are transferred to third persons at home and/or abroad in accordance with the purposes and legal compliance grounds specified below.

Table-2

Purpose of Transfer	Legal Compliance Reason	Recipient Group
Sub-Merchant claims handling	Personal data of the parties to an agreement are required to be processed (pursuant to Article 5/2(c) of PDPL) provided that such transfer is directly related to the formation or performance of such agreement.	Suppliers (Main Vendor)
Conducting Settlement Processes	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç)); processing of data being mandatory for the establishment, exercise, or protection of a legal right (article 5/2(e));	Suppliers (Visa MasterCard), Authorized governmental authorities (BKM)

Conducting Chargeback & Dispute processes	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç)); processing of data being mandatory for the establishment, exercise, or protection of a legal right (article 5/2(e));	Suppliers (Visa MasterCard), Authorized governmental authorities (BKM)
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Pursuant to Article 9/10 of the PDPL, the particulars regarding the data transfer that is considered a customer secret in accordance with the regulations in the banking legislation are reserved. In this context, in cases where data transfer is required in accordance with the banking legislation, you will be contacted separately and detailed notification will be provided on the matter.

3. Protection, Storage and Destruction of Your Personal Data

Your personal data will be processed by our Company for the duration required by the purpose of processing and, in any case, retained until the end of the statutory period. Upon expiration of the retention period, your personal data will be deleted from both electronic and physical environments, destroyed or anonymized in accordance with the LPPD legislation, in line with our Company's Personal Data Protection and Privacy Policy, Sensitive Personal Data Protection and Privacy Policy, and Personal Data Retention and Destruction Policy.

Our Company takes any and all the required technical and administrative measures in accordance with the LPPD legislation to prevent your personal data from being accessed by unauthorized persons, processed incorrectly, disclosed, changed/deleted for reasons not in accordance with the law.

In the event of damage to your personal data due to attacks on our Company's physical archives, servers, or other systems, and/or if your data is accessed or disclosed by third parties, our Company will promptly inform you and the Personal Data Protection Authority.

4. Your Right to Information

Under Article 11 of the LPPD, you have the right to apply to our Company and (a) inquire whether your personal data has been processed; (b) if it has been processed, request information regarding the processing; (c) learn about the purpose of the processing and whether it has been used in accordance with that purpose; (ç) know any third parties to whom your data has been transferred, either domestically or abroad; (d) request the correction if processed incompletely or inaccurately; (e) request the deletion or destruction of your data as part of the conditions set out in Article 7 of Law No. 6698; (f) request that the third parties to whom your personal data has been transferred be informed of the actions taken in accordance with (d) and (e); (g) object to any unfavorable outcome arising from the exclusive analysis of your data by automated systems; and (đ) claim damages for any damages incurred due to unlawful processing of your personal data.

5. Your Requests

If you have any questions or inquiries regarding the processing of your personal data as part of this Notification, you can contact our Company via Registered E-Mail System.

Our Company will finalize the application inquiries according to the nature of the request and within 30 (thirty) days at the latest, in accordance with Article 13 of the PDPL. If the transaction



involves cost, the tariff determined by the PDP Board will be charged. In case your request is rejected, the reason(s) for rejection will be stated in our response.

If you think that your personal data processed by our Bank is out dated, incomplete or incorrect, please contact our Company immediately at fibabanka.kisiselveri@hs03.kep.tr for your notifications of changes regarding your relevant personal data.

This Notification may be revised to comply with changing conditions and legal regulations. You can follow any updates at <https://www.fibabanka.com.tr/>

DATA CONTROLLER
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