

FİBABANKA ANONİM ŞİRKETİ
NOTIFICATION FOR RECIPIENTS OF MONEY TRANSFERS

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 recipients of money transfers, 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 recipients of money transfers.

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

Your personal data as specified in the Table-1 below (“your personal data”) are collected and processed by our Company in connection with the management of the process involving money transfer transactions, and through automated and non-automated methods, 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
Managing the processes involving EFT/FAST transactions	• Identity Details (name, surname) • Financial Data (account data, IBAN, recipient bank) • Customer transaction details (message, transaction amount, transaction description, source of payment, purpose of payment)	Personal data of the parties to an agreement are required to be processed (pursuant to Article 5/2(c) of LPPD) provided that such transfer is directly related to the formation or performance of such agreement.
Making money transfers	• Identity Details (name, surname) • Financial Data (account data, IBAN, recipient bank) • Customer transaction details (transaction amount, transaction description)	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.

SWIFT message process	• Identity Details (name, surname) • Financial Data (account data, account number, IBAN) • Customer transaction information (transaction value date, currency type, amount, currency code, value date, transaction description, transaction date, expense details, commission amount)	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.
International money transfer transactions	• Identity Details (name, surname) • Financial Data (account data, account number, IBAN) • Customer transaction information (transaction value date, currency type, amount, currency code, value date, transaction description, transaction date, expense details, commission amount)	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.
Respond to inquiry of recipient bank	• Identity details (name, surname, place of birth, date of birth) • Contact details (address) • Financial data (salary) • Customer transaction details (transaction description, source of transaction, annual spending amount, source of payment, degree of kinship to the recipient) • Professional experience details (profession)	The processing of personal data being mandatory for the establishment, exercise, or protection of a right (article 5/2(d));

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
Managing the processes involving EFT/FAST transactions	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.	Authorized governmental authorities (CBRT), Private law legal entities (Banks)

Making money transfers	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.	Authorized governmental authorities (CBRT)
Respond to inquiry of recipient bank	The processing of personal data being mandatory for the establishment, exercise, or protection of a right (article 5/2(d));	Authorized governmental authorities (OFAC)
SWIFT message process	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 (Fineksus/Paygate Maestro, Paygate Inspector)
International money transfer transactions	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.	Private law legal entities (Banks)

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 FİBABANKA ANONİM ŞİRKETİ

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