

FİBABANKA ANONİM ŞİRKETİ PRIVACY NOTICE FOR POTENTIAL CLIENT OF PRODUCTS AND SERVICES

We, as Fibabanka Anonim Şirketi (the “**Company**” or “**Fibabanka**”) in the capacity of data controller, conduct maximum care for processing and protection of the personal data of the visitors of the web site, in compliance with the Law on Personal Data Protection no.6698 (“**LPPD**”) and the secondary regulations (jointly, the “**PDP Law**”).

By this Privacy Notice, we would like to inform you regarding the personal data processing operations carried out by our Company, in relation to you, the potential client of the products and services.

1. Your Personal Data That Shall Be Processed, Methods of Collecting Them, Purposes of Processing and Reasons of Legality

Your personal data specified below (“**your personal data**”), is obtained and processed by our Company, in line with the implementation of agreements and requirements of services which shall be provided to you; electronically, verbally or in writing, in physical or electronic environments, in a manner connected, limited, proportionate to the purposes defined below and in compliance with the principles laid down by the LPPD, in compliance with the PDP Law, by automatic and non-automatic means.

This Privacy Notice is drafted to cover the legal reasons set forth in the law, with regards to your processed personal data, within the scope of all products and/or services offered to you by our Bank

Your personal data that shall be processed by our Bank, within the framework of the products and/or services offered by our Bank, shall be as follows:

Your Personal Data That Shall Be Processed:

- **Identity information** (name, surname, Republic of Turkey Identity Number, place of birth, signature, nationality, mother’s name, father’s name, date of birth, year of birth, citizenship information, place of birth, gender, maiden surname, identity certificate serial number, identity certificate sequence no., marital status, expiry date of the identity certificate, military service status, country of birth)
- **Communication information** (address, phone number, e-mail address, trade name, residence information, workplace information, receiver of e-mail, reference e-mail address, information regarding receiver of e-mail)
- **Finance information** (IBAN, bank account information, source of income, information regarding owned real estate, scores, credit information-accounts in which the account holder is in debtor position, limit information on source basis, risk information on source basis, credit type, account information on credit type basis, collaterals given (debtor), collaterals under which suretyship is given (surety), real person shareholders, fiscal (Revenue Administration) information, branch name, KKB (*Credit Bureau of Turkey*) score, BBE (*Individual Indebtedness Index*) score, payment information, credit disbursement date, credit limit, instalment, remaining debt, total number of entries, total

limit amount, number of open entries, open limit amount, sum of instalments, remaining total debt, product type, product, sub product type, application status, channel, amount, application date, limit, reason of release, year of release, amount of promissory note, lend registry details of the house for which housing loan shall be used, traffic registry license certificate of the automobile for which loan shall be used, Finecus Avra rating score, group rating score, limit-risk information at the bank, credit performance information at the bank, total capital amount, Memzuç (overall risk records) information, immovable property information, movable assets information, investments, fiscal analysis, financial analysis, information regarding protested promissory notes, Memzuç (overall risk records) information, bank warning list, credits of negative nature, credits at the bank, individual limit risk inquiry, derivative, KKB (*Credit Bureau of Turkey*) score, fiscal information, balance sheet information, account activities, branch, tax residency information, credit and risk information, monthly average income, tax office, turnover information, card security code, card expiry date)

- **Personal employee information** (curriculum vitae information, title, educational status, workplace declaration, commencement date of employment, date of quitting job)
- **Image and voice records** (photograph, voice record, video record, camera records)
- **Customer transaction information** (channel information, source of customer acquisition, customer number, cheque information KKB (*Credit Bureau of Turkey*) cheque score, cheque report, unpaid cheque information, information regarding the faith of complaint process, information regarding cheque(s) subject to court proceedings, individual cheque inquiry, NRIS (execution proceeding information), application number, customer information file , product information, language selection, customer transaction actions, new identity certificate ownership status, NPC ownership status, latest error message received, credit amount, credit limit information, maturity period information, application result information, application cancellation reason, application cancellation date, application rejection reason, profit centre, unpaid cheque information)
- **Professional experience information** (professional information)
- **Transaction security information** (Fiba Anahtar, log records, IP address information, device information, operator information, user password)
- **Legal transaction information** (UYAP (*National Judicial Network Project*) injury, electronics attachment information)
- **Other** (tender ban information, reference number, applicant number, application number, communication language, social media account user name, number of followers, account book sending option, call period, call result, tax office)
- **Marketing information** (cookie records)
- **Biometric data** (biometric photograph)
- **Health information** (information regarding disability status)

Reasons of Legality:

- **Explicitly set forth in the laws (art.5/2(a))**

Customer acquisition; Customer acquisition [taking identity certificate image by OCR (*Optical Character Recognition*); Customer acquisition (Having identity chip read by NFC and taking identity certificate image); making risk assessment for the persons, to whom store credit shall be marketed; making risk assessment for the persons, to whom Tarfin credit shall be marketed; customer acquisition within the scope of Corporate Mobile Banking / GKTİ video banking

- **Provided that it is directly related with conclusion or implementation of an agreement, it is required to process personal data of the parties to the agreement (art.5/2 (c))**

Account opening via the branch channel; account opening via the Store channel; account opening via the digital channels; receiving applications relating to products in the official web site; receiving card information in the virtual POS (*Point of Sale*) process; EFT/FAST process; keeping the data relating to potential customers, customer acquisition process regarding whom cannot be completed; taking store credit applications by SMS; making customer inquiry in the credit application process; taking Tarfin credit applications by SMS; verification of customer information; following the applications made via the channels out of branch; Customer acquisition; Customer acquisition (taking identity certificate image by OCR); Customer acquisition [Having identity chip read by NFC (*Near Field Communication*) and taking identity certificate image]; customer acquisition within the scope of Corporate Mobile Banking / GKTİ video banking

- **It is required for fulfilment of the data controller's legal obligation (art.5/2 (ç))**

Evaluating the requests and complaints received via the Call Centre channel; making analyses regarding quality level of voice records and reporting them to the BRSA; in the conversations made, verifying potential customer; in the conversations made, verifying the information of a potential customer; recording call centre conversation made with a potential customer

- **Making public directly by related person (art.5/2 (d))**

Complaint and reputation management

- **Processing of personal data is required for legitimate interests of the data controller (art.5/2 (f))**

Following customer status and following the calls

- **Explicit consent**

Customer acquisition within the scope of Corporate Mobile Banking / GKTİ video banking; for evaluating the credit applications of potential customers, making Application Survey Screen KKB (*Credit Bureau of Turkey*) Inquiries; for evaluating the credit applications of potential customers, making inquiry regarding information relating to credit used in the last 24 hours; for evaluating the credit applications of potential customers, making Cheque-Promissory Note

Inquiries; for evaluating the credit applications of potential customers, making Application Survey - Intelligence; evaluating credit applications of potential customers; for analysing the financial data of potential customers for credit assessment / credibility purposes, making their KKB (*Credit Bureau of Turkey*) inquiries; for analysing the financial data of potential customers for credit assessment / credibility purposes, making their TAKBIS (*Land Registry and Cadastre Information System*) inquiries; for analysing the financial data of potential customers for credit assessment / credibility purposes, examining the financial analysis reports; Complaint and reputation management; Statistical analysis; Using temporary and permanent type cookie; Customer acquisition; Customer acquisition (taking identity certificate image by OCR); Customer acquisition (having identity chip read by NFC and taking identity certificate image); Face recognition system; Customer acquisition (Video banking); For the purpose of evaluating credit applications of potential customers, making corporate KKB (*Credit Bureau of Turkey*) inquiry; For the purpose of evaluating credit applications of potential customers, making individual KKB (*Credit Bureau of Turkey*) inquiry; For the purpose of evaluating, with regards to risk, potential customers, to whom credit shall be marketed, making KKB (*Credit Bureau of Turkey*) check; For identification of potential customers, to whom credit shall be allocated, making their GIB (*Revenue Administration*) inquiries; Making credit limit evaluations of potential customers; For credit limit evaluations of potential customers, making GIB (*Revenue Administration*) inquiry; For credit limit evaluations of potential customers, making cheque index inquiry.

2. Your Personal Data Sharing With Third Parties

2.1. Disclosure to Parties in Turkey

- **Explicit consent (art. 8/1)**

In the processes of, for evaluating the credit applications of potential customers, making Application Survey Screen KKB (*Credit Bureau of Turkey*) Inquiries; for evaluating the credit applications of potential customers, making inquiry regarding information relating to credit used in the last 24 hours; for evaluating the credit applications of potential customers, making Cheque-Promissory Note Inquiries; for evaluating the credit applications of potential customers, making Application Survey - Intelligence; evaluating credit applications of potential customers; for analysing the financial data of potential customers for credit assessment / credibility purposes, examining the financial analysis reports; Complaint and reputation management; Customer acquisition (Video banking); your personal data shall be disclosed to the **Suppliers**;

In the processes of, for analysing the financial data of potential customers for credit assessment / credibility purposes, making their TAKBIS (*Land Registry and Cadastre Information System*) inquiries; your personal data shall be disclosed to **Authorised Public Institutions and Organisations (TAKBIS (*Land Registry and Cadastre Information System*))**;

In the processes of customer acquisition within the scope of Corporate Mobile Banking / GKTI video banking; for the purpose of evaluating credit applications of potential customers, making corporate KKB (*Credit Bureau of Turkey*) inquiry; for the purpose of evaluating credit applications of potential customers, making individual KKB (*Credit Bureau of Turkey*) inquiry; your personal data shall be disclosed to **Authorised Public Institutions and Organisations (Identity Sharing System, Address Sharing System, Revenue Administration, MERSIS, ESBIS, KKB)**;

In the processes of customer acquisition (taking identity certificate image by OCR); Customer acquisition (Having identity chip read by NFC and taking identity certificate image); face recognition system; your personal data shall be transferred to the **Identity Sharing System**.

- **Due to the legal reason that it is required to process personal data of the parties to the agreement, provided that it is directly related with conclusion or implementation of an agreement (art.5/2 (c)):**

In the processes of account opening via the store channel; your personal data shall be disclosed to the **Suppliers**;

In the processes of taking store credit applications by SMS; taking Tarfin credit applications by SMS; verification of customer information; customer acquisition within the scope of Corporate Mobile Banking / GKTI video banking; your personal data shall be disclosed to **Authorised Public Institutions and Organisations (Identity Sharing System, Address Sharing System, Revenue Administration, MERSIS, ESBIS, KKB)**;

In the processes of customer acquisition (taking identity certificate image by OCR); Customer acquisition (Having identity chip read by NFC and taking identity certificate image); keeping the data relating to potential customers regarding whom customer acquisition process cannot be completed; your personal data shall be transferred to the **Identity Sharing System**;

In the processes of making customer inquiry in the credit application process; verification of customer information; your personal data shall be disclosed to the **Business Partners (related store)**.

- **Due to the legal reason that it is required for fulfilment of the data controller's legal obligation (art.5/2 (ç))**

For the purposes of verifying the identity of a potential customer in the discussions carried out; making analyses regarding quality level of voice records and reporting them to the BRSA; recording call centre conversations made with a potential customer; your personal data shall be disclosed to the **Suppliers**.

- **Explicitly set forth in the law (art.5/2(a))**

In the processes of customer acquisition within the scope of Corporate Mobile Banking / GKTI video banking; your personal data shall be disclosed to **Authorised Public Institutions and Organisations (Identity Sharing System, Address Sharing System, Revenue Administration, MERSIS, ESBIS, KKB)**;

In the processes of customer acquisition (taking identity certificate image by OCR); Customer acquisition (Having identity chip read by NFC and taking identity certificate image); keeping the data relating to potential customers regarding whom customer acquisition process cannot be completed; your personal data shall be transferred to the **Identity Sharing System**.

- **Making public directly by related person (art.5/2 (d))**

In the processes of complaint and reputation management; your personal data shall be disclosed to the **Suppliers**.

Our Company undertakes that, other than the purposes defined above, your personal data shall not be disclosed to third persons, without obtaining your **explicit consent**.

2.2. Disclosure to Parties Abroad

Our Company shall not disclose your personal data defined above, to any parties abroad.

3. Records Retention, Destruction and Security Policy

Your personal data shall be processed by our Company, for the period as required by the purpose, based on which your personal data shall be processed, and shall be kept, in any case, until the end of legal period. Following expiry of the keeping period, your personal data shall be erased from electronic and physical environments, shall be destroyed or anonymised, in accordance with our Company's ***Policy on Protection and Confidentiality of Personal Data, Policy on Protection and Confidentiality of Private Personal Data*** and ***Policy on Keeping and Destruction of Personal Data***, in compliance with the PDP Law.

For the purposes of preventing unauthorised persons to access your personal data, any incorrect processing of your personal data, disclosure thereof, change/deletion thereof for illegal purposes; ensuring protection and security of your personal data; our Company shall take all necessary technical and administrative measures according to the PDP Law.

Fibabanka will immediately notify you and the Personal Data Protection Board if your personal data is damaged and / or seized by third parties as a result of attacks on Fibabanka hard copy archives and / or servers and / or other systems.

4. Your Right to Be Informed

Under The Law on Personal Data Protection, Article 11, you can apply to our Company; (a) to be informed whether your personal data is processed or not; (b) if processed, to request information in relation thereto; (c) to learn the purpose of processing and whether it is used for intended purpose or not; (ç) to know the 3rd persons, to whom your personal data is disclosed in Turkey or abroad; (d) if processed incompletely or incorrectly, to request rectification thereof; (e) to request the erasure or destruction of your personal data under the conditions laid down in Article 7; (f) to request notification of the transactions made according to the paragraphs (d) and (e), to third persons to whom personal data is disclosed; (g) to object against any outcome which shall arise due to analysis thereof by means of automatic systems exclusively, and (ğ) to request compensation for the damage arising from the unlawful processing of your personal data.

5. Your Requests

In case, within the scope of this Privacy Notice, you have any question or request regarding processing of your personal data, you can apply to our Company by either ways of the Online Form available at the address of <https://www.fibabanka.com.tr/bilgi-toplumu-hizmetleri/kvkk-kapsaminda-basvuru-talepleri>, or via the Registered E-Mail System.

According to article 13 of the LPPD, our Company shall finalise the process regarding application requests, depending in the nature of related request and at the latest within 30 (thirty) days. In case related transaction requires incurring any cost, the tariff determined by the PPD Board, shall be applicable. If your request is rejected, reason/s of rejection shall be indicated in our response letter.

If you think that your personal data processed by our Company, is outdated, incomplete or incorrect, for your amendment declarations in relation to your related personal data, please contact our Company immediately, via the e-mail address fibabanka.kisiselveri@hs03.kep.tr.

This Privacy Notice may be updated, in order to adapt to changing conditions and legal regulations. You can follow the changes via the web address at <https://www.fibabanka.com.tr/>.

Data Controller

Fibabanka Anonim Şirketi

Mersis Number:	Address:	E-mail:
0209000780814852	Esentepe Mahallesi Büyükdere Caddesi No:129 Şişli İstanbul / Turkey	fibabanka.kisiselveri@hs03.kep.tr