

FİBABANKA ANONİM ŞİRKETİ
GENERAL NOTIFICATION FOR WEBSITE VISITORS

Fibabanka Anonim Şirketi (“**Fibabanka**” or “**Bank**”) acting as the data controller exerts utmost care and diligence for the processing and protection of personal data owned by the persons visiting our website (“**User(s)**” or “**you**”) irrespective of their customer status or organic connection, in accordance with the Law No. 6698 on the Protection of Personal Data (“**PDPL**”) and its secondary regulations (“**PDP legislation**”).

With this Notification, we, as Fibabanka, would like to inform you in the most transparent way about the personal data processing activities we carry out with respect to our website visitors, in accordance with Article 10 of the PDPL and the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Disclosure Obligation.

You can review our [Cookie Statement](#) in order to get more information about your personal data processed through cookies.

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 cookie management, prospective customer profiling and product application processes, 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 our bank are as follows:

Table-1

Purposes for Processing	Personal Data	Legal Compliance Reasons
Receiving applications with respect to the products	<ul style="list-style-type: none">Identity details (name, surname, Turkish ID No, date of birth)Contact details (address, residence details, e-mail address, phone number)Customer transaction information (branch where the loan will be made available, application type, verification information)	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.

<p>To fulfill our obligations arising from the Law No. 5651 on the Regulation of Publications Made on the Internet and Combating Crimes Committed through Such Publications and its secondary regulations.</p>	<ul style="list-style-type: none"> Transaction security records (IP Addresses, Browser and Device Information, website login/logout records, internet log information, unique identifier information, unique device icon, statistics on web page views, incoming and outgoing traffic information, online identifiers) 	<p>Explicitly proposed under the laws (Article 5/2 (a)); Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç))</p>
<p>Inquiry and complaint management</p>	<ul style="list-style-type: none"> Identity details (name, surname, Turkish ID No, date of birth) Contact details (address, residence details, e-mail address, phone number) Customer transaction information (preferred communication method) Other (subject of inquiry or complaint) 	<p>Personal data of the parties to an agreement are required to be processed, provided that such transfer is directly related to the formation or performance of such agreement (Article 5/2(c)); The processing of data is mandatory for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedom of the concerned person (Article 5/2(f))</p>
<p>Ensuring smooth navigation on our website and improving user experience</p>	<ul style="list-style-type: none"> Other (Cookies and other similar tracking technologies) 	<p>Indispensable cookies: Personal data of the parties to an agreement are required to be processed, provided that such transfer is directly related to the formation or performance of such agreement (Article 5/2(c)); The processing of data is mandatory for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedom of the concerned person (Article 5/2(f)) Functionality and Preference Cookies: Explicit consent (article 5/1) Performance and Analytics Cookies: Explicit consent (article 5/1)</p>

Follow-up of customer information forms	<ul style="list-style-type: none"> • Identity details (name, surname, Turkish ID No, foreign identification number, nationality) • Contact details (phone number) • Other (subject of notification) 	<p>Personal data of the parties to an agreement are required to be processed, provided that such transfer is directly related to the formation or performance of such agreement (article 5/2(c));</p> <p>The processing of data is mandatory for the establishment, exercise, or protection of a legal right (article 5/2(e));</p> <p>The processing of data is mandatory for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedom of the concerned person (article 5/2(f))</p>
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2. Transferring your Personal Data to Third Parties

2.1 Domestic Transfer

Your personal data mentioned above are transferred to the recipient groups listed below in accordance with the purposes and legal grounds specified below.

Table-2

Purpose of Transfer	Legal Compliance Reason	Recipient Group
Informing Authorized Persons, Institutions and Organizations	Being mandatory for the data controller to fulfill its legal obligations (Article 5/2 (ç))	Competent governmental authorities
Inquiry and complaint management	Processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract” or subparagraph (f) thereof which reads “processing of data is strictly necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the relevant person (article 5/2(f))	Suppliers

Fibabanka undertakes not to transfer your personal data to third parties without **your explicit consent**, except for the purposes mentioned above.

2.2 International Transfer

Our company does not transfer your personal data collected through the website to third parties residing abroad.

3. Protection, Storage and Destruction of Your Personal Data

Our company has a very high awareness of the protection of personal data security and privacy. 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 legal 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 (ğ) 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 any 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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