

FİBABANKA ANONİM ŞİRKETİ
PRIVACY NOTICE FOR RISK GROUPS

We, as Fibabanka Anonim Şirketi (the “Company” or “Fibabanka”), acting in the capacity of data controller, maximum care for processing and protection of the personal data of the you as people within risk group (even if you are not a customer of our Company, your spouse, children and those listed, members of the board of directors or general managers or persons which are jointly or individually, directly or indirectly, or participates with unlimited liability in a legal entity partnership and qualified shareholders, members of the board of directors and the general manager of a bank, which they jointly or individually, directly or indirectly control or partnerships in which they are partners with unlimited liability or in which they are members of the board of directors or general manager and real and legal entities that have a surety, guarantee or similar relationship to such an extent that the insolvency of one of them will result in the insolvency of one or more of the constitutes a risk group.) in compliance with the Law on Personal Data Protection no. 6698 (“**LPPD**”) and the secondary legislation thereof (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 for the risk group.

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

Your personal data specified in Table-1 below (“**your personal data**”), is obtained and processed by our Company, within the scope of Banking Law No. 5411 and applicable legislation for purposes of determining, pursuing, reporting and controlling of the risk group that you will be involved in is related to the determination of credit limits to be extended to the risk group; electronically, verbally or in writing, in physical or electronic environments, in a manner connected, limited, proportionate to the purposes defined in Table-1 below and in compliance with the principled laid down by the LPPD, in compliance with the PDP Law, by automatic and non-automatic means.

Real and legal entities that will be included in the risk group are determined by the Banking Regulation and Supervision Agency, even if you are not customer of our Company, to fulfil our legal obligations, especially the banking legislation, identifying risk groups, in order to determine the total amount of credit that can be provided to the persons within the same risk group, to determine the credit limits to be extended to a risk group according to the banking legislation, to determine the risk group you will be involved in, to monitor, report, control, to carry out the credibility assessments and to manage the legal and financial risks of our Company, your personal data can be also processed by our Company.

This Privacy Notice is drafted to cover the legal reasons set forth in the law, with regards to your processed personal data.

Your personal data that shall be processed by the Bank, shall be as follows.

Table-1

Processing Purpose	Personal Data	Reasons of Legality
The processes related to the Bank's debt/credits	• Identity information (name, surname, passport information, signature) • Communication information (address, phone number, e-mail address)	Provided that it is directly relating to concluding or implementing an agreement, requirement to process the personal data relating to the parties to an agreement (article 5/2 (c))
Making individual Credit Bureau of Turkey ("CBT") inquiries for commercial loan/credit eligibility assessments	• Identity information (name, surname, Republic of Turkey Identity Number (RTIN), date of birth, place of birth) • Communication information (address) • Customer transaction information (information on unpaid cheque(s), information on cheque(s) subject to court process, individual cheque inquiry) • Financial information (information on protested cheque(s), Memzuç (Central Bank Over-all Credit Risk Records) information, bank warning list, credits of negative nature, CBT score, Individual Indebtedness Index ("III") score, credits at the bank, individual limit risk inquiry, derivative) • Information on legal transaction(s) (National Judicial Network Information Technologies System ("UYAP") inquiry/ record, e-attachment information/ status NRIS (execution proceeding information))	Being set forth explicitly in the laws (art.5/2(a))

Making individual CBT inquiries for corporate loan/credit eligibility assessments	• Identity information (Republic of Turkey Identity Number (RTIN)) • Financial information (scores, credit information-accounts in debit status, limit information on source basis, risk information on source basis, account information on the basis of credit type, given collaterals, collaterals whereby suretyship is given, real person shareholders, (Turkish Revenue Administration ("RA") information) • Other (bidding process restriction notices)	Being set forth explicitly in the laws (art.5/2(a))
Making individual CBT inquiries to assessment the risks may arise from the result of the loans/credits.	• Financial information (legal entity participants and shareholders, real person shareholders)	Being set forth explicitly in the laws (art.5/2(a))
Making a TAKBIS inquiry to monitor the risks that may arise regarding the consequence of the allocated loans.	• Identity information (name, surname, Republic of Turkey Identity Number, place of birth, date of birth, mother's name, father's name, gender, maiden surname) • Finance information (information regarding owned real estate)	Being set forth explicitly in the laws (art.5/2(a))
Creating the loan/credit offers.	• Identity information (name, surname) • Customer transaction information (customer number) • Other (shareholding information)	Provided that it is directly relating to concluding or implementing an agreement, requirement to process the personal data relating to the parties to an agreement (article 5/2 (c))
The operational processes related to loan products within the scope of housing	• Other (spouse information)	Requirement for the data controller to fulfil his/her legal obligation (article 5/2 (ç))
The operational processes related to loan products within the scope of personal loan/credit agreement.	• Other (spouse information)	Provided that it is directly relating to concluding or implementing an agreement, requirement to process the personal data relating to the parties to an agreement (article 5/2 (c))

2. Sharing Your Personal Data with Third Persons

2.1 Disclosure / Transfer in Turkey

Your personal data described above, shall be disclosed/transferred in accordance with the purposes and reasons of legality set forth below.

Processing Purpose	Reason of Legality	Receiver Group
The processes related to the Bank's Debt/credits	Provided that it is directly relating to concluding or implementing an agreement, requirement to process the personal data relating to the parties to an agreement (article 5/2 (c))	Business Partners (Business Partner Bank)
Making a TAKBIS inquiry to monitor the risks that may arise regarding the consequence of the allocated loans.	Being set forth explicitly in the laws (art.5/2(a))	Authorised Public Institutions and Organisations (TAKBIS (Land Registry and Cadastre Information System))

Fibabanka undertakes that it shall not disclose your personal data to third persons without taking your explicit consent, except for the purposes defined above.

2.2 Disclosure to Parties Abroad

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

3. Protection, Preservation and Destruction of Your Personal Data

Your personal data shall be processed by our Company during the period required by the purpose of processing personal data, and in any, shall be kept until the end of legally required period. Upon expiry of the keeping period, your personal data shall be erased from electronic and physical environments, shall be destroyed or anonymised according to the PDP (Personal Data Protection) legislation, in accordance with our Company's Policy on Protection and Secrecy of Personal Data, Policy on Protection and Secrecy of Private Personal Data and Policy on Keeping/Storage 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 purpose of processing and whether it is used according to intended purpose, or not; **(d)** to know the third persons to whom your personal data is disclosed in Turkey and abroad; **(e)** if processed incompletely or incorrectly, rectification thereof; **(f)** to request the erasure or destruction of your personal data under the conditions laid down in Article 7; **(g)** to request notification of the transactions made according to the paragraphs **(e)** and **(f)**, to third persons to whom personal data has been disclosed/transferred; **(h)** to object against any outcome which shall arise due to analysis thereof by means of automatic systems exclusively, and **(i)** 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.

Our Company shall handle and finalise the application requests, according to the nature of related request and at the latest within 30 (thirty) days, according to article 13 of the LPPD (Law on Personal Data Protection). When required due to nature of related transaction, tariff set by the PDP Board shall be applicable. If your request is refused, reason/s of refusal shall be specified in our response letter.

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

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

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