

CLARIFICATION TEXT REGARDING THE PROTECTION OF PERSONAL DATA

Pursuant to the Article 10 of the Law on the Protection of Personal Data (“**KVKK**”) No. 6698 and within the scope of the Communiqué on the Procedures and Principles for the Fulfilment of the Obligation to Inform, we, as Nurol Yatırım Bankası Anonim Şirketi (“**Nurolbank**” or “**Bank**”), under the capacity of “Data Controller”, we hereby declare that we shall collect and process the personal data of our current and potential customers within the scope defined by the legislation and within the framework described below.

Personal Data Processing Purposes:

As Nurolbank, we are collecting and processing general and special categories of personal data for the purposes specified below. As below;

- a)** Within the scope of the Article 4 of the Banking Law No. 5411, provision of cash, non-cash etc. all kinds of loans; cash and fiduciary payment and fund transfer transactions, all kinds of payment and collection transactions including correspondence banking and the use of cheque accounts; redemption of cheques and other bills; custodian services; foreign exchange transactions including cash transactions; purchase and sales of monetary market instruments; purchase, sales or deposit transactions of precious or non-precious metals and stones; purchase, sale and brokerage of futures agreements, option agreements, simple or complex financial instruments that contain multiple derivative instruments based on economic and financial indicators, capital market instruments, commodities, precious and non-precious metals and foreign currency; buying and selling capital market instruments and repurchase or resale commitments; brokerage transactions for the sale of capital market instruments through issuance or public offering; purchase and sales of previously issued capital market instruments for brokerage; guarantee works such as guarantees, warranties and other obligations in favour of others; market making within the obligations assumed within the scope of an agreement executed under the Ministry of Treasury and Finance and/or Central Bank of the Republic of Turkey and its associations regarding purchase and sales transactions; realisation of money purchase and sale brokerage in the interbank market,
- b)** Controlling the activities for fraud, money laundering, financing of terrorism in the banking transactions other than these activities and the notification of suspicious transactions, recording and evaluation of the calls received by Nurolbank call centre; making administrative and legal follow-up transactions for unpaid debts, executing legal transactions in cases where the bank is a party, carrying out letter of credit transactions,
- c)** Execution of the request, objection and complaint processes from our customers and other persons concerned; conducting intelligence gathering and evaluation procedures for current and/or potential customers who demand loans,
- d)** Issuance of all records and documents regarding the works and transactions to be carried out in electronic, oral or written works and transactions by our customers,
- e)** Provided that the permission of our customers are obtained, the promotion of the investment banking activities carried out within the scope of the **Banking Legislation**, as well as the products and services the Bank provides, realisation of marketing and notification activities and the determination of the most suitable product and service options,
- f)** Carrying out the analysis, reporting, segmentation and modelling activities in various contents; target setting, reporting, risk analysis, improvement of customer relations management, Bank

performance tracking and usage in analysis and statistical activities, design of the service provision models, making market researches,

- g)** Strategic planning, corporate management, corporate sustainability (business continuity) and the planning, inspection and realisation of information safety processes,
- h)** Fulfilment of information/document storage, reporting, information and audit obligations prescribed by Banking Regulation and Supervision Authority, Association of Financial Institutions, Capital Markets Union, Borsa İstanbul A.Ş., İstanbul Takas ve Saklama Bankası A.Ş., Takasbank, Central Bank of the Republic of Turkey, Capital Markets Board, Financial Crimes Investigation Board, Banks Association of Turkey, Revenue Administration, Undersecretariat of Treasury and other official institutions,
- i)** In the event our Bank's Head Office and branches are visited, providing the physical security of the workplace via security cameras,
- j)** Being able to perform the agreements signed with our current and/or potential customers,
- k)** Carrying out the communication activities.

Legal Reasons of the Collection and Processing of your Personal Data:

Your general and special categories of personal data (within the scope of the legislation) are collected, processed, retained and transferred with the reasons specified below. As below;

- a)** In the event it is obligatory for communicating with our customers and other relevant persons and the continuity of the communication,
- b)** In the event of presence of the explicit consent of our current and/or potential customers for the promotion and marketing of the investment banking services and products to be offered by our bank,
- c)** In the event they are clearly stipulated in the law,
- d)** For the performance of the banking activities in accordance with the law, public order, Banking Legislation and administrative regulations as well as banking practices and in the event our Bank has a legal obligation to perform information/document storage, reporting, audit sharing works and transactions foreseen by all judicial and administrative authorities,
- e)** To benefit from the banking activities of our customers and/or in the event it is obligatory for the establishment and protection of the rights for the works and transactions to be performed with our Bank;
- f)** Without prejudice to the fundamental rights and freedoms of the data owner; the Bank's legitimate interests regarding the provision of the electronic environment and information safety, prevention of actions and situations that may constitute crime/fault, credit risk measurement, evaluation and follow-up,
- g)** In the event it is necessary for the establishment and performance of banking services agreements, loan agreements, agreements for debt instruments and derivative transactions, agreements regarding surety and collateral, agreements regarding our business relationship with suppliers and business partners,
- h)** In the event the personal data is made public by the personal data subject.

Personal Data Collection Methodology

Your personal data is collected from the verbal communications carried out in the head office or in the branches of Nurobank, via agreements, information forms, instructions and other documents regarding the banking transactions executed via approval and signing, from the calls made via our call centre, with face-to-face interviews with current and potential customers, information sharing through e-mail and through 3rd party institutions and organisations that are deemed necessary within the scope of intelligence activities, information and document sharing between financial institutions; via security cameras located in places of the head office and the branches of our Bank, fully or partially automated methods or non-automated methods provided that it is a part of a data recording systems, our affiliates and group companies in Turkey/abroad, program partners whom we cooperate with, various institutions and organisations, including other domestic/foreign banks and financial institutions in all kinds of verbal, written or electronic media that can be obtained from outside the Bank.

Transfer of Personal Data:

Provided that it is in accordance with the provisions of the Banking Legislation and based on the reasons under Articles 5 and 6 of the KVKK, with the purposes explained above, your Personal Data may be shared with;

- a) Our business partners in order to comply with the MASAK legislation, know your customer principle and banking practices, for establishing a contractual relationship with our potential customers,
- b) Our business partners and suppliers (including other banks and financial institutions) with whom we have contractual relationships, in order to be able to fulfil the performances we have undertaken with the agreements to which we are a party; to provide the continuity of the products and services of our Bank and to carry out the promotion, marketing, advertising, campaign activities of our new products and services within the direction of our legitimate interests, provided that your explicit consent is received,
- c) Support services institutions for the provision of support services that are necessary for carrying out our commercial activities as well as our banking operations,
- d) Our consultants and lawyers in order to establish the rights of our customers and to provide the protection of these rights and for the resolution of legal disputes in which the Bank is a party and/or fulfilment of the requests for sharing information and documents by judicial and administrative authorities,
- e) Public entities such as Banking Regulation and Supervision Authority, Association of Financial Institutions, Central Bank of the Republic of Turkey, Capital Markets Board, Financial Crimes Investigation Board, Undersecretariat of Treasury, Revenue Administration, KKB, Banks Association of Turkey in order for the Bank to fulfil its obligation to audit, report, share information and documents, as foreseen in the Banking Legislation;
- f) Financial institutions resident abroad in circumstances where it is necessary in order to fulfil your instructions and requests within the scope of the banking activities;

within the limits specified in legal and administrative regulations. In this regard, we hereby declare that your personal data can be saved, stored, retained, rearranged, explained, transferred, received, classified, and processed by the transferred third parties in accordance with the KVKK.

Rights of the Data Subject:

According to the Article 11 of the KVKK and the Communiqué on the Procedures and Principles for the Application to the Data Controller”, by applying Nurobank, the relevant person is entitled to;

- a) Learn whether their personal data is processed or not,
- b) Request information if processed,
- c) Learn the purpose of processing personal data and whether they are used for their purpose,
- d) Know the third parties their personal data is transferred within or outside the country,
- e) Request correction if processed deficiently/faulty,
- f) Request deletion / destruction of personal data within the framework of the conditions foreseen under Article 7 of the KVKK,
- g) Request that the transactions carried out in accordance with sub-paragraphs (d) and (e) above are notified to third persons whom personal data was transferred,
- h) Object to the occurrence of a result against them due to analysing the processed data exclusively through automated systems,
- i) Claim the damage be compensated in the event of damage due to the processing of personal data unlawfully

. In this regard, you may communicate your applications with the methods below.

- By hand to the head office address of our Bank at Maslak Mahallesi, Büyükdere Caddesi, No:255, Kat:15 İç Kapı No: 1502, 34485 Maslak-Sarıyer/İstanbul address, by presentation of ID;
- With a notification through notary public,
- Via e-mail to be sent to our Bank’s “ nurobank.kvkk@nurobank.hs03.kep.tr ” e-mail address,
- Via e-mail to be sent to our Bank’s “ nurobank@nurobank.com.tr ” e-mail address provided that your identity is validated with secure electronic signature or mobile signature

In accordance with the Article 13 of the KVKK, Nurobank will finalise the application requests according to the nature of the request and within 30 (thirty) days at the latest. Where the transaction requires a cost, the tariff determined by the Personal Data Protection Board will apply. If the request is rejected, the reason for rejection(s) is justified in writing or electronically.

Trade Name : Nurol Yatırım Bankası A.Ş.

Trade Registry Details : İstanbul Trade Registry Office / 412969

Mersis No : 0632-0112-0100-0017

Address: Maslak Mahallesi, Büyükdere Caddesi, No:255 Nurol Plaza, Kat:15, İç Kapı No: 1502, 34485
Maslak-Sarıyer/İstanbul

Website : www.nurolbank.com.tr

Fax : 0 (212)-286 81 01

Phone : 0 (212)-286 81 00

NUROL YATIRIM BANKASI A.Ş.

ANNEX: With the Banking Legislation definition, the Laws below and the secondary regulations of these Laws are specified without limitation. Turkish Civil Code, Capital Market Law, Turkish Code of Obligations, Law on the Prevention of Laundering Proceeds of Crime, Turkish Commercial Code, Notification Law, Execution and Bankruptcy Law, Law on Cheques, Banking Law, Law on the Protection of the Value of Turkish Currency, Electronic Signature Law, Social Security and General Health Insurance Law, Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions.

“I have received the copy of the Clarification Text Regarding the Protection of Personal Data.”

Name-Surname :

Date :

Signature :