

CLARIFICATION TEXT REGARDING THE RISK GROUP IN ACCORDANCE WITH LAW ON THE PROTECTION OF PERSONAL DATA

Pursuant to the Article 10 of the Law on the Protection of Personal Data (“**Law**”) 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.

1. PURPOSE OF PROCESSING YOUR PERSONAL DATA

The partnerships in which you, your spouse, your children are board members or general managers or in which these persons are solely or jointly in control or participating with unlimited liability, and the partnership in which the qualified shareholders, board members and the general manager of a bank or in which these persons are solely or jointly in control, are board members, general managers or participating with unlimited liability and the real or legal persons who have a surety, warranty and similar relations in which one person’s failure to pay would result another’s failure to pay constitutes a “**risk group**” in accordance with the legislation. The real or legal persons to be included in the risk group are determined by the Banking Regulation and Supervision Authority (“**BRSA**”) and even though you are not our customer, in order to determine the credit limits to be used in a risk group, it is necessary to determine the risk group that you will be included. Therefore your personal data can be collected pursuant to the banking legislation.

Your personal data collected within the scope of the explanations above can be processed by our Bank in accordance with the basic principles foreseen in KVKK, within the scope of the personal data processing terms specified under Articles 5 and 6 of the KVKK. The personal data of the persons in the “risk group” can be processed by our Bank for the purpose of determining, monitoring, reporting and controlling the risk group to which they will be included in the determination of the credit limits to be allocated within the scope of the relevant Banking Law No. 5411.

2. METHOD OF COLLECTING PERSONAL DATA

Your personal data is collected from the verbal communications carried out in the head office or in the branches of Nurolbank, via agreements, information forms, instructions and other documents regarding the banking transactions executed via approval and signing, from the communications with our personnel face-to-face or via telephone, from customer visits, information sharing through e-mail and through 3rd party institutions and organisations that are deemed necessary within the scope of intelligence activities, information/document sharing between financial institutions; via security cameras located in 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.

3. TRANSFER OF YOUR 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) Banking Regulation and Supervision Authority, Association of Financial Institutions, Capital Markets Association of Turkey (“TSPB”), Borsa İstanbul A.Ş., İstanbul Takas ve Saklama Bankası A.Ş. in order for the Bank to fulfil its obligation to audit, report, share information, and documents as foreseen in the Banking Legislation. Public entities such as Takasbank, Central Bank, Capital Markets Board, Financial Crimes Investigation Board, Ministry of Treasury and Finance, Revenue Administration, Credit Registry Office, Banks Association of Turkey
- 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 relevant Law.

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 a copy of the Clarification Text Regarding the Risk Group Pursuant to the Law on Protection of Personal Data.”

Name-Surname :
Date :
Signature :