

ICBC TURKEY BANK A.Ş. CUSTOMER DISCLOSURE STATEMENT ON THE PROCESSING OF PERSONAL DATA

In order to protect the fundamental rights and freedoms of individuals, especially the right to privacy, in the processing of personal data and to determine the obligations of natural and legal persons who process personal data, we would like to inform you, as ICBC Turkey Bank A.Ş. ("Our Bank"), as Data Controller, in accordance with Article 10 of the Law titled "Obligation of Data Controller to Inform", regarding the Personal Data Protection Law No. 6698 ("Law or KVKK") published in the Official Gazette dated April 7, 2016 and numbered 29677.

1. Data Controller

Our Bank keeps the system infrastructure and internet presentations and documents at the most reliable level and takes the necessary security measures in order to protect the confidentiality of personal information received from customers, customer relatives, parents-guardians-representatives, customer guarantors-conferences, partners-representatives-authorities of corporate-commercial customers, potential customers, litigation-file parties, beneficiaries, drawers, ciranta, debtors, visitors and other third parties.

Pursuant to the Law, your personal and sensitive personal data (hereinafter collectively referred to as personal data) are collected and processed by our Bank ICBC Turkey Bank A.Ş. as the data controller for the purposes and methods described below.

2. Personal Data Collected

Our Bank processes the following personal data in accordance with the following purposes and in compliance with the principles in the Law and our Bank's '*Personal Data Protection and Privacy Policy*', in general, but which may change, including but not limited to, due to changing legislation and practices. In case of changes in the processed personal data, this information text will be updated.

Identity Data: Identifying information such as name, surname, date of birth, place of birth, identification number, passport number, tax identification number, nationality, gender, marital status, blood type, religion, photograph and signature,

Contact Data: Contact information such as address, e-mail, telephone and fax number, as well as communication records within the scope of telephone calls (voice recordings) and e-mail correspondence,

Legal Transaction Data: Data processed within the scope of any legal event (opinion, lawsuit, execution, judicial authority, etc.),

Customer Transaction Data: Information on check/note transactions,

Physical Space Security Data: Video/camera recordings, entry-exit records of visitors,

Transaction Security Data: Internet banking/mobile banking password and passwords,

Financial Data: IBAN, account number, customer number, credit card number, financial data related to collection, payment and reconciliation activities,

Finance - Data on Assets: Monthly net income information, title deed records, real estate information, vehicle information, financial performance information, credit and risk information,

Data on Working Life: Occupation, title, employment status,

Sensitive Personal Data: Criminal record, blood type, religion, health data, disability status, biometric photograph in the identity card, facial print,

Other Data: Spouse/child information.

3. Methods of Collecting Personal Data

Our Bank may obtain your personal data from all kinds of written, verbal and electronic media, fully or partially by automatic means or by methods that are part of a data recording system but are not automatic. Our Bank may collect your personal data;

- Through face-to-face interviews conducted at our Head Office and Branches and through forms and video recording devices (cameras) obtained during these interviews (Face-to-face service channels),
- Call center, e-mail, SMS and electronic banking channels, mobile branch video calls,
- Through ATMs, our website, internet banking and mobile banking (digital channels) and through the contact and other request forms available there,
- The Risk Center of the Banks Association of Turkey (TBB) or companies established by at least five banks or financial institutions (Interbank Card Center (BKM), Credit Bureau (KKB), etc.) as well as through system integrations shared through public institutions and organizations (such as the Identity Sharing System).

4. Purposes and Legal Grounds for Processing Personal Data

Your personal data collected by our Bank are processed for the purposes specified in the table below in accordance with the basic principles stipulated in the KVKK and for legal reasons based on Law No. 6698.

Purpose of Data Processing	Legal Reason - Law No. 6698
Banking Law No. 5411 and its secondary legislation, payment and securities settlement systems, payment services, insurance, tax, social security legislation, consumer law and other applicable legislation, including but not limited to	5.2.a) It is clearly stipulated in the laws. 5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.
Carrying out insurance agency transactions, including offering insurance and private pension products as an agent, calculating premiums for these products and mediating premium payments	5.2.a) & 6.3.b) It is expressly stipulated by law. 5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 6.3.e) It is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services by persons under the obligation of confidentiality or authorized institutions and organizations,

<p>Creating special offers and campaigns according to your habits and preferences, conducting modeling, segmentation and customer analysis studies and other marketing activities in order to determine the appropriate products and services that can be offered to you, conducting internal planning and statistical studies by our Bank in this context, conducting campaign, promotion, loyalty program activities, monitoring and reporting</p>	<p>5.1. Existence of your explicit consent 5.2.c) It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Maintaining the Bank's internal information systems and application management operations</p>	<p>5.2.a) It is expressly provided for by law. 5.2.c) It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Carrying out and reporting on internal audit and external audit activities of the Bank</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p>
<p>Managing bank cash flow transactions, generating volume/profitability reports</p>	<p>5.2.c) It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. 6.3.b) It is clearly stipulated in the laws.</p>
<p>Identification in order to ensure bank and customer transaction security, performing, recording and reporting controls to prevent money laundering, bribery, fraud, financial crimes and sanctions, reporting suspicious transactions</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Providing special services for disabled customers in accordance with the Regulation on Accessibility of Banking Services</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p>

<p>Making the necessary assessments for the product/service offered within the framework of the banking legislation, making creditworthiness assessments, determining and establishing the collaterals to be received, and carrying out transactions related to collaterals</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right.</p>
<p>Collecting our Bank's receivables in whole or in part, contacting you in case of delay in all your payments including credit/credit card payments</p>	<p>5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Preventing fraud and ensuring transaction security in our Bank's service channels</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p>
<p>Execution of our Bank's Internal Control and Regulatory Compliance processes (MASAK applications and reporting)</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Fulfillment of your agreements and instructions regarding these products and services within the scope of the provision of our Bank's products and services, the establishment and execution of contracts related to them, the opening of accounts, and the execution of transactions</p>	<p>5.2.a) & 6.3.b) It is expressly provided for by law. 5.2.c) It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>

<p>Fulfillment of the legal and commercial obligations of our Bank arising from the contract within the framework of the contracts made with third parties who have a business relationship with our Bank and our subsidiaries/affiliated partnerships or the activities carried out together</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p>
<p>Execution of customer transfer transactions from our Bank to our subsidiaries and affiliates</p>	<p>5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Managing/executing the processes related to written and verbal requests/requests/complaints/suggestions submitted to us through all channels within the scope of our Bank's Customer Satisfaction practices,</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Offering gifts/point advantages to our customers within the scope of our Bank's loyalty programs, calculating/using the points earned, informing our customers on these issues</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Carrying out registration and transfer transactions regarding the assets on which the Bank has rights</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>

<p>Carrying out the necessary legal procedures in various disputes and follow-up, litigation, mediation and other legal processes to which our Bank and our subsidiaries/affiliates are parties</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right.</p>
<p>Transactions related to ensuring information security and informing official institutions (BRSA)</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p>
<p>Follow-up of finance and accounting affairs, creation of financial and commercial reports</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Execution of our finance, communication, market research and procurement operations</p>	<p>5.2.c) It is necessary to process personal data of the parties to a contract, provided that it is directly related to the conclusion or performance of the contract. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Use of video recording devices (cameras) in the Head Office Building and Branches due to physical security measures</p>	<p>5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Transition system applications, tax, fee, donation, donation, salary, school installment etc. carrying out intermediary transactions for their payments</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p>
<p>Internet banking (Individual/Corporate) and mobile banking transactions</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p>

	<p>5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p> <p>5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p> <p>6.3.a) Existence of your explicit consent</p>
<p>Activities related to planned SMS and e-mail sending within the scope of authorized marketing and mandatory/legal information activities</p>	<p>5.2.a) It is clearly stipulated in the laws.</p> <p>5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract.</p> <p>5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p>
<p>To better understand your demands and expectations and plan our activities within this framework, to calculate the fees, commissions, interest rates and limits of our Bank's products and services, and to make cost exemption definitions</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract.</p> <p>5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p> <p>5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>To be able to reach you through the contact channels you have shared with us for your offers, information, promotion and callback requests from all channels</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract.</p> <p>5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p> <p>5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Carrying out financial transactions of an international nature, complying with the rules stipulated by international financial institutions and acting within globally accepted financial and security principles in accordance with the nature of the transactions</p>	<p>5.2.a) It is clearly stipulated in the laws.</p> <p>5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract.</p> <p>5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p> <p>5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p> <p>5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>

<p>Realization of asset sales, receivable transfer transactions, debt liquidation and debt restructuring</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Fulfillment of information and document storage obligations arising from legal regulations, archive system management</p>	<p>5.2.a) & 6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Fulfillment of monitoring, reporting and information obligations stipulated by legal authorities, regulatory bodies, organizations based on sector-specific regulations and other authorities</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation.</p>
<p>Maintaining and reporting risk management activities related to the management of legal, financial, operational, compliance, reputation, credit and market risks</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Meeting the demands from authorized institutions and organizations</p>	<p>5.2.a) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right.</p>

5. Transfer of Processed Personal Data

Your personal data collected and processed; Within the framework of the personal data processing conditions and purposes specified in the Law, within the framework of the personal data processing conditions and purposes specified in the Law, to the extent required by the transaction subject to the transfer and limited to the extent required for the performance of the work, to our bank's domestic subsidiary ICBC Turkey Yatırım Menkul Değerler A.Ş. and to the following official institutions / organizations and public institutions / organizations and private law persons, real / legal persons

from whom services and / or consultancy are received, real / legal persons who perform independent audit services and our foreign correspondent banks due to the nature of the transaction.

*Your collected and processed personal data are transferred to ICBC (China), our main partner located abroad, in accordance with the conditions specified in Articles 9 and 10 of the Law, within the scope of the Banking Law No. 5411 and the relevant secondary legislation within the scope of the Banking Law No. 5411 and the relevant secondary legislation, only for the purpose of our Bank's audit and investigation activities and in order to make reporting specific to these activities.

Transfer Purpose	Recipient Institutions	Legal Reason - Law No. 6698
<p>In order to fulfill the monitoring, reporting and information obligations stipulated by legal authorities, regulatory bodies, organizations based on sector-specific regulations and other authorities</p>	<p>Banks Association of Turkey (BAT) and Risk Center Banking Regulation and Supervision Agency (BRSA) Consumer Arbitration Committees Interbank Card Center (BKM) Central Bank of the Republic of Turkey (CBRT) Turkish Ministry of Treasury and Financial Crimes Investigation Board (MASAK) Savings Deposit Insurance Fund (SDIF) Turkish Ministry of Finance and Revenue Administration (RA) Independent external audit firms subject to legal regulations Courts/Execution Offices/Authorities/Arbitrators Land Registry Offices General Directorates of Security Traffic Registration Units Credit Bureau (KKB)) General Directorate of Population and Citizenship Affairs - Identity Sharing System (KPS) Social Security Institution (SSI) Central Registry Agency (CRA) TAKASBANK Notaries</p>	<p>5.2.a) &6.3.b) It is clearly stipulated in the laws. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) &6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Within the scope of our Support Services Purchases, transactions such as data transfer to companies that mediate transactions such as interest calculation and application taking related to our products, execution</p>	<p>Appraisal Companies Housing Loan Com Tr Danışmanlık A.Ş. Transportation companies (Courier Service Providers)/PPTT, KURYENET, etc. , which may vary according to current agreements Asset Management Companies</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is</p>

<p>of transactions such as registration, valuation, etc. of real estates to be taken as collateral, transportation services, asset transfer</p>		<p>mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Within the scope of execution of Credit Card Expenditure Dispute processes</p>	<p>VISA/MASTERCARD/BONUSNET Companies</p>	<p>5.2.c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data of the parties to the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Works carried out within the scope of subscription transactions related to our services such as tax, donation, invoice, school installment, salary payments</p>	<p>Institutions where payment transactions are intermediated</p>	<p>5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract. 5.2.e) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>

<p>Regarding the execution of your insurance transactions with the insurance companies we work in agreement with within the scope of our agency services</p>	<p>Insurance Companies</p>	<p>5.2.a) & 6.3.b.) It is expressly provided for by law. 5.2.c) It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>
<p>Carrying out financial transactions of an international nature, complying with the rules stipulated by international financial institutions and acting within globally accepted financial and security principles in accordance with the nature of the transactions</p>	<p>Foreign Correspondent Banks and Domestic/foreign Representative Offices ICBC (CHINA) and Foreign Subsidiaries</p>	<p>5.2.a) & 6.3.b.) It is expressly provided for by law. 5.2.c) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract. 5.2.ç) It is mandatory for the data controller to fulfill its legal obligation. 5.2.e) & 6.3.d) Data processing is mandatory for the establishment, exercise or protection of a right. 5.2.f) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. 6.3.a) Existence of your explicit consent</p>

6. Rights of the Data Subject Whose Personal Data is Processed

As personal data owners, if you submit your requests regarding your rights by the methods set out below, our Bank will finalize the request as soon as possible and within thirty (30) days at the latest, depending on the nature of the request. No fee will be charged for up to ten pages in the response. A transaction fee of 1 Turkish Lira will be charged for each page over ten pages. If the response to the application is given in a recording medium such as CD, flash memory, the fee that may be requested

by our Bank will not exceed the cost of the recording medium. In this context, regarding your personal data;

- Learn whether personal data is being processed,
- Request information if their personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- Although it has been processed in accordance with the provisions of Law No. 6698 and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, it has the right to demand compensation for the damage.

In accordance with paragraph 1 of Article 13 of the KVKK and the Communiqué on the Procedures and Principles of Application to the Data Controller dated 10.03.2018 and numbered 30356, you can submit your request to exercise your rights mentioned above in Turkish and in writing or by using the registered electronic mail (KEP) address, secure electronic signature, mobile signature or the electronic mail address previously notified to our Bank and registered in our system. In the applications, only information about the applicant will be provided, and it will not be possible to obtain information about other family members and third parties. Our Bank reserves the right to verify your identity before responding.

In your application;

- a) Your name, surname and signature if the application is in writing,
- b) For citizens of the Republic of Turkey, your Turkish ID number; if you are a foreigner, your nationality, passport number or ID number, if any,
- c) Your residential or workplace address for notification,
- d) Your e-mail address, telephone and fax numbers, if any,
- e) Your request subject,

information and documents on the subject, if any, must also be attached to the application.

You can submit your written applications, by attaching the necessary documents, to our branches as the data controller and to our Bank's *Maslak Mah. Dereboyu / 2 Cad. No:13 34398 Sarıyer / İstanbul* Head Office address by hand or through a notary public. You can access the application form on our website and at our Branches.

You can send your applications via e-mail to kvkk@icbc.com.tr e-mail address. You can make your applications via KEP to icbc-turkey@hs02.kep.tr KEP address.

Depending on the nature of your request, information and documents that will enable identification must be provided to us completely and accurately. If the requested information and documents are not provided as required, there may be problems in the full and qualified execution of the

investigations to be carried out by our Bank based on your request. In this case, our Bank declares that it reserves its legal rights. For this reason, your application must be sent in a complete manner and contain the requested information and documents according to the nature of your request.

7. Request for Updating Information

Your personal data processed by our Bank must be accurate and up-to-date. For this reason, in case of any change in your personal data, you can notify our Bank by the means specified in Article 6.

Information Regarding Processing of the Personal Data of the Persons Subject to the Risk Group

In article 49 of the Banking Law no.5411, it is set forth that; “A real person and his/her spouse and children, partnerships, of which they are a member of the board of directors or general manager, or which are controlled, directly or indirectly, by them or jointly by a legal person or solely, or which they participate in with unlimited liability; shall constitute a risk group.”. In this context, in the risk assessment processes relating to credit applications; even if not our customer, you, your spouse and children, and the partnerships, of which said persons are a member of the board of directors or general manager, or which are controlled, directly or indirectly, by them or jointly by a legal person or solely, or which they participate in with unlimited liability; shall constitute a risk group, shall constitute a risk group, and the personal data of said persons may be processed. Other real and legal persons who shall be considered within the scope of the risk group, are defined in related articles of the Law, and furthermore, may be designated by the Republic of Turkey, Banking Regulation and Supervision Board. In order to fulfil our legal liabilities according to the banking legislation (the Law no.6698, art.5/2/ç) and the obligations under the banking services agreement, to which we are party (the Law no.6698, art.5/2/c); your personal data may be processed by our Bank, for the purposes determining, monitoring, reporting, supervising the risk group, which you shall be included in for setting the credit limits which shall be made available to a risk group and for risk analysis. Regarding the collection methods of your personal data that shall be processed, to whom and for which purposes said data may be disclosed, and your rights arising from the Law, we request you to examine the “ICBC TURKEY BANK A.Ş. CUSTOMER DISCLOSURE STATEMENT ON THE PROCESSING OF PERSONAL DATA.