

## **PROTECTION OF PERSONAL DATA**

As Ata Yatırım Menkul Kıymetler A.Ş., taking into careful consideration your security as our valuable customers, we would like to inform you on “the Law on the Protection of Personal Data” in order to ensure the protection of fundamental rights and freedoms, above all the right to respect for private life, and fulfill our “Obligation to Inform”.

As per this legislation, your consent will be requested for the processing of your personal data as explained at the end of the Information Note.

### **INFORMATION NOTE ON THE PROCESSING OF YOUR PERSONAL DATA AS PREPARED IN ACCORDANCE WITH THE LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA (“KVKK”)**

As Ata Yatırım Menkul Kıymetler Yatırım Anonim Şirketi ("Ata Yatırım"), we care a lot about the security of personal data. As part of our awareness, we attach great importance to the processing and retention of all kinds of personal data belonging to all persons related to Ata Yatırım, including the beneficiaries of our investment products and services, in accordance with the Law No. 6698 on the Protection of Personal Data (“the Law”).

Ata Yatırım always reserves all rights to update the contents of this Information Note, based on any changes in the enforceable legislation and changes in purposes for its processing and transfer of personal data. We would like to let you know that you can always follow up on any such updates on this page.

In the context of this Information Note, personal data means “any information relating to an identified or identifiable natural person”, as described also by the Law. We are thus hereby presenting below to your attention information regarding for which purposes all your personal data is to be processed, to which persons your personal data may be transferred and for which purposes, the methods as well as the legal bases of personal data processing and your rights:

## **1. Data Controller and Representative**

Your personal data may be recorded, stored, updated, and disclosed/transferred to third parties where allowed by the relevant legislation, categorized and processed by Ata Yatırım in forms prescribed by the Law.

## **2. Collection of Personal Data**

Your personal data may be collected by Ata Yatırım using many methods, including via channels such as General Directorate, Branches, Ata Online and call centers on physical or electronic media based on your declarations; within the limitations described by the legislation, by institutions providing service in the context of system integration between public authorities and institutions and Ata Yatırım [Borsa İstanbul, Capital Markets Board of Turkey, Identity Sharing System (KPS), Credit Records Bureau (KKB), etc.] as well as institutions which provide support services or are business partners, domestic/international subsidiaries, institutions with which it has business partnership, public institutions, domestic/international banks and other third parties; verbally, in writing or in electronic means, automatized in whole or in part or in non-automatized manners as part of any data recording system.

In this context, your personal data will be collected in order to be processed and transferred within the limitations of the conditions and purposes for processing of personal data as stipulated in Art 5 and Art 6 of the Law and in line with the legal bases and purposes for processing and transfer included in this Information Note.

## **3. Processing of Your Personal Data**

Your personal data will be processed based on your explicit consent within the scope of the conditions and purposes for personal data protection as described by Art 5 and Art 6 of the Law, to ensure that you can benefit from the services provided by Ata Yatırım, taking any foreseeable information security measures, not to be used out of the conditions and scope as set out below by this Note:

Under the Law, your personal data will be processed by Ata Yatırım as Data Controller within the scope of investment activities within the framework as explained below:

- To enable the provision of investment products and services and performance of a contract
- (including contracting processes and/or following up of legal claims)
- For fulfilment of liabilities as stipulated by legislation and information of authorized institutions based on legal requirements,

- For determination of the identity of the persons engaged in transactions (or proxies thereof),
- For drafting of records and documents, printed or in electronic form,
- For fulfilment of requirements such as data storage, reporting, information, as required by relevant legislation,
- For creation and management of information technology infrastructures,
- For planning, supervision and performance of information security processes,
- For following up of financial and/or accounting tasks,
- For analysis of productivity/efficiency and/or suitability of work activities, as well as for the planning and/or performance thereof,
- For planning and performance of marketing and communication,
- For planning and performance of corporate communicative activities,
- For planning and/or performance of auditing activities of Ata Yatırım,
- For planning and performance of the operational activities necessary for the legitimate conducting of activities of Ata Yatırım in accordance with Company procedures and/or relevant legislation,
- For delivery of the data to third parties from which we receive cloud storage services,
- To provide to our domestic/international institutions with which we have partnered for the transmission of commercial electronic messages to our customers,
- For planning and/or performance of customer relationship management processes,
- For following up of requests and/or complaints by customers.

#### **4. Transfer of Your Personal Data as Processed by Ata Yatırım**

Your personal data may be transferred to persons below within the scope of the conditions and purposes for processing personal data, as described by Art 8 and Art 9 of the Law:

- Our subsidiaries,
- Our shareholders,
- Our business partners,
- Third parties with whom we are in a contractual relationship, as necessary for the flawless provision of our services,
- Public authorities and private persons authorized by legislation.

When transferring data to third persons, all necessary technical and legal measures are taken in order to prevent violations of rights.

### **5. Transfer Abroad of Your Personal Data Processed by Ata Yatırım**

The Company may transfer your personal data to countries where data security regulations on data storage equal to those where you are located exist/do not exist. However, Ata Yatırım will take the sufficient measures to protect your data.

### **6. Your Rights as a Data Subject**

Under the scope of Art 11 of the Law, your rights as a data subject are as indicated below:

- To learn whether your personal data are processed or not,
- To request information if your personal data are processed,
- To learn the purpose of your data processing and whether this data is used for intended purposes,
- To know the third parties to whom your personal data is transferred domestically or abroad,
- To request the rectification of incomplete or inaccurate data, if any; and to request notification of the operations carried out to third parties to whom your personal data is transferred in compliance with this obligation,
- To request the erasure or destruction of your personal data upon disappearance of reasons which require the process, despite the data in question having been processed under the provisions of this Law and other related laws; as well as request the notification of such operations to third parties to whom your personal data has been transferred,
- To object to the processing of your personal data exclusively by automatic means, which leads to an unfavourable consequence for you as a data subject,
- To request compensation for the damage arising from the unlawful processing your personal data.

Your requests related to your rights as a data subject submitted to Ata Yatırım through means designated below will be processed as soon as possible considering the nature of the request and within thirty days at the latest by Ata Yatırım.

The expenses to be incurred for the conclusion of your requests as well as any fees as determined by the Personal Data Protection Board will be collected by Ata Yatırım.

In order to exercise your rights as stipulated above, you can submit your request to the address Emirhan Caddesi Dikilitaş Mahallesi No:109 Kat:11 Balmumcu Beşiktaş/İstanbul via registered mail or mail with receipt confirmation service to the address Emirhan Caddesi Dikilitaş Mahallesi No:109 Kat:12 Balmumcu Beşiktaş/İstanbul, along with information necessary for your identification and your explanations regarding your rights which you would like to utilize, mentioning also on which rights described by Art 11 of the Law your request is based.

The following information is required to be included in your application;

- Name and surname
- If the application is in written form, a hand signature,
- Turkish identification number for Turkish citizens; indication of nationality, passport number or (if applicable) identification number for foreigners,
- Place of residence or work, as convenient for notification,
- If applicable, electronic mail address, telephone number and fax number for notification,
- Subject of your request.

You are also required to attach to your application as the data subject all information and documents relevant to your request.