

**İŞ YATIRIM MENKUL DEĞERLER A.Ş.**

**DATA PROTECTION  
AND PRIVACY POLICY**

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## DATA PROTECTION AND PRIVACY POLICY

### I. INTRODUCTION

We, İş Yatırım Menkul Değerler A.Ş. (“**İs Yatırım**”), really care for the protection of the personal data of our customers, business partners, shareholders and employees and persons who make a job application to us or visit our web site or contact us in any other way.

In our capacity as the data officer, we have drafted this Data Protection and Privacy Policy (“**Policy**”) in order to explain our rules and policies governing the processing of personal data and the use of cookies and similar technologies, in line with the Law No 6698 on the Protection of Personal Data (“**PPD Law**”). Depending on the nature and type of the relation between Is Yatirim and the data subject, Is Yatirim may provide additional or different data protection policies and/or notices to the data subject. Those specific policies and notices may include some statements different from, or additional to, those provided for herein. In such case, those specific policies and notices provided to the data subject will prevail.

The terms “we”, “us” and “our” as used herein shall refer to Is Yatirim unless otherwise expressly stated.

### II. PERSONAL DATA

#### A. Definition of Personal Data

As explained in Article 3/I (d) of PPD Law, “personal data” mean any kind of information concerning an identified or identifiable person. Within this scope, anonymous or anonymized data or any other data that cannot be associated with an identifiable person may not qualify as personal data hereunder.

#### B. General Principles on the Processing of Personal Data

According to Article 3/I(e) of PPD Law, “processing of data process” means any operation performed upon personal data, such as collection, recording, storage, maintenance, alteration, rearrangement, disclosure, transfer, acquisition, dissemination or otherwise making available, classification or blocking of personal data wholly or partially, by automatic means or non-automatic means, where it is part of a filing system.

We process personal data in compliance with the principles below, for the purposes listed under the section “*Purposes for Processing Personal Data*” hereof:

- (i) to be in compliance with law and rules of good faith,

- (ii) to be accurate and, where necessary, up-to-date,
- (iii) to process for specific, explicit and legitimate purposes,
- (iv) to be relevant, limited and proportionate to the purpose underlying the processing,
- (v) to store for such duration which is specified in the relevant legislation or is necessary for the fulfilment of the purpose of processing.

### **C. Data Processed by Is Yatirim**

Is Yatirim may process general or special categories of personal data, upon the express consent of the data subject, or in the event of the situations set out in Articles 5 and 6 of PPD Law, without need for such a consent. Special categories of personal data are, by their very nature, more sensitive for the data subject. Pursuant to Article 6 of PPD Law, special categories of personal includes data concerning a person's race, ethnic origin, political opinions, philosophical belief, religion, sect or other faith, attire and clothing, membership to associations, unions or trusts, health, sex life, criminal record and biometric and genetic data.

General and special categories of data that may be processed by Is Yatirim are illustrated below. That said, which data may be processed in relation to each specific data subject may change depending on the type and nature of the relation between the data subject and Is Yatirim and the communication means used. In line with the terms and conditions set out in relevant legislation and this Policy, the following types of data may be processed by Is Yatirim:

- (i) data enabling the identification of the data subject, such as name, surname, profession, title, employment details, educational background, professional background and experience, gender, marital status, citizenship status, taxpayer status, and if any, data concerning guardians, parents or representative;
- (ii) data (including birth date, birth place, ID number, blood type, religion and photo) shown in identification documents, such as ID card, passport, driving licence;;
- (iii) contact details such as address, telephone, electronic mail or facsimile number for home, office or temporary residence;
- (iv) financial data such investment purposes, risk and return preferences, knowledge and experience in relation to capital markets operations, present or future saving amounts that can be allocated for capital market operations, products and services found to be suitable for the data subject, investment services and ancillary services used by the data subject, local and international markets or investment institutions in or by means of

which the data subject has made a transaction, traded products, trading frequency and volume;

- (v) communication records such as telephone calls and electronic mail exchanges with Is Yatirim as well as other audio-visual data;
- (vi) data such as Internet protocol (IP) address, device identity, unique identifier, device type, advertisement identity, unique device symbol, statistical data relating to website view and display, incoming and outgoing traffic data, routing URL, Internet log data, location data, visited websites and data concerning acts executed via our web sites, platforms, Internet network and our advertisement and electronic mail contents.

#### **D. Purpose of Processing Personal Data**

Personal data may be processed by Is Yatirim for the following purposes and stored as long as those purposes require them to be stored:

- (i) to fulfil Is Yatirim's legal and administrative obligations,
- (ii) to negotiate for, execute and perform present or future contracts;
- (iii) to identify and determine products, services and platforms which may be suitable for or interested to investors, customize and improve them to meet investors' needs, offer an effective customer services,
- (iv) to secure and improve coordination, cooperation and efficiency within and between the departments of Is Yatirim,
- (v) to procure the security of Is Yatirim's website and other electronic systems and physical environments,
- (vi) to notify changes to applicable legislation or the rules and policies adopted by Is Yatirim, and deliver notices to the data subject for other matters concerning them;
- (vii) to promote, market and improve Is Yatirim and its services and products, consult the data subject for her/his opinions through polls and surveys,
- (viii) to celebrate the data subject's birthday, provide her/his participation in lotteries or contests, give presents and organize other similar events, promotions and campaigns in favour of the data subject;
- (ix) to investigate, identify and prevent breaches of any agreements or law, report such cases to competent judicial or administrative bodies or authorities,
- (x) to settle present or future legal disputes,

- (xi) to answer questions and inquiries,
- (xii) in case Is Yatirim or Is Bank Group is reorganized or Is Yatirim undergoes a merger, spin-off, change of type or change of control, to properly proceed with and complete these operations;
- (xiii) to execute company law transactions;
- (xiv) to meet personnel need in line with the human resource policies of Is Yatirim, perform, develop and improve its recruitment process;
- (xv) to evaluate job applications and contact with job applicants;
- (xvi) to develop and improve human resources, public relations and marketing policies of Is Yatirim;
- (xvii) to establish, use or protect a right, where necessary;
- (xviii) to protect legitimate interests of Is Yatirim, provided that it does not harm the data subject's fundamental rights and freedoms.

#### **E. Transfer of Personal Data in and outside Turkey**

We may transfer personal data to third parties in or outside Turkey and may store them at servers or other electronic media located in or outside Turkey for the purposes listed in the section “*Purpose of Processing Personal Data*” hereof, provided that we comply with general principles set out in Article 4 of PPD Law and those terms and conditions set out in Articles 8 and 9 thereof, and adopt necessary safety measures.

While third parties to whom personal data may be transferred may change depending on various factors, including the type and nature of the relation between the data subject and Is Yatirim and markets where the trading is executed, such third parties generally comprise the followings:

- (i) companies of Is Bank Group;
- (ii) Capital Markets Agency, Borsa Istanbul, Takasbank (Turkish Settlement and Custody Bank) and other local or foreign regulatory authorities, exchange markets, central settlement and custody agencies, central counterparts as well as other competent institutions and agencies and competent third parties;
- (iii) investment institutions and agencies, custody institutions, platform providers, data distributors, utility service providers and other business partners, suppliers and subcontractors, with whom Is Yatirim deals in or outside Turkey;

- (iv) in case Is Yatirim or Is Bank Group is reorganized or Is Yatirim undergoes a merger, spin-off, change of type or change of control, third persons party to such transactions.

#### **F. Methods to collect personal data, and legal grounds**

Is Yatirim may collect personal data verbally or in writing or as audio-visual media or in any other physical or electronic format, for the purposes listed in the section “*Purposes of Processing Personal Data*” hereof, in conformity with the terms and conditions set out in Articles 5 and 6 of PPD Law. Personal data may be collected by means of general directorates, branches, offices and other physical environment, call centres, websites, mobile applications, ATMs, electronic trading platforms, social media and other public media, with which data subjects may contact, or through their participation in training sessions, conferences and similar events, or through investigation.

Although Is Yatirim normally collects personal data from data subjects, it may also collect personal data, subject to the terms and conditions set out in Articles 5 and 6 of PPD Law, from other companies of Is Bank Group or Is Yatirim’s agencies, dealers, contractors or subcontractors or individuals or entities that are named as reference by the job applicant or shown in the applicant’s educational and job background, recruitment platforms, portfolio management companies and investment institutions with whom the investor works or any other individual or entity representing, or represented by, the data subject.

#### **G. Storage Period of Personal Data**

Unless a longer storage period is required or permitted by law, Is Yatirim will store personal data only for the duration necessary for the achievement of the purposes set out herein. Any personal data whose storage term expires shall be deleted, destroyed or anonymized by Is Yatirim in accordance with Article 7 of PPD Law.

#### **H. Security of Personal Data and Supervision**

As provided for under Article 12 of PPD Law, Is Yatirim, in its capacity as the data officer, adopts necessary technical and administrative measures for establishing an acceptable level of security that prevents unlawful process of personal data or unlawful access to them and provide their protection. For this purpose, Is Yatirim:

- (i) ensures that its internal organisation and business operations are conducted in line with the policies and rules designed for the protection of personal data;

- (ii) carries out works to raise awareness among employees regarding data protection legislation and the internal policies and rules designed in accordance therewith;
- (iii) gets necessary representations and undertakings from employees and data processors acting on behalf of Is Yatirim to ensure the security and privacy of personal data, and makes any violation of these representations and undertakings subject to certain sanctions;
- (iv) applies necessary information security measures to ensure the security of personal data in and outside the company and prevent unauthorized access to data;
- (v) periodically monitor compliance with internal policies and rules designed to protect personal data, and regularly reports results to the board of directors;
- (vi) checks the adequacy of adopted measures at specific periods and intends to constantly improve the existing data security system as far as available means and resources permit it.

#### **I. Rights of Data Subjects under PPD Law:**

Pursuant to Article 11 of PPD Law, a data subject shall have the following rights:

- (i) to inquire whether her/his personal data are processed,
- (ii) to ask for information about her/his personal data that have been processed,
- (iii) to inquire the purpose underlying the processing of her/his personal data and whether they are used in line with such purpose,
- (iv) to learn third parties in Turkey or abroad to whom her/his personal data have been transferred,
- (v) where his personal data are processed inaccurately or incompletely, to ask for their correction,
- (vi) where reasons underlying the processing of his personal data no more exist, to ask for their destruction or deletion;
- (vii) to ask that such correction or deletion process is notified to third parties to whom her/his personal data have been transferred,
- (viii) to object to consequences to her/his detriment, arising from the analysis of the processed data exclusively via automatic systems,
- (ix) where the data subject suffers a loss due to unlawful process of her/his personal data, to seek compensation for his loss.

In the event that the data subject wishes to exercise either of his rights above, he should complete the application form attached hereto and (i) send the originally signed form to the address of Is Kuleleri Kule 2, Kat: 12, 4. Levent, Istanbul personally or via notary public or (ii) send the filled form to [bilgi@isyatirim.com.tr](mailto:bilgi@isyatirim.com.tr) with secure electronic signature.

Where the Personal Data Protection Board of Turkey decides that such requests may be submitted via methods other than those described herein, Is Yatirim shall further announce those new methods.

Is Yatirim will respond to requests from data subjects at latest within thirty days, based on the nature of the request, pursuant to Article 13 of PPD Law. Any favourable or unfavourable responses to the data subject's request may be sent to him in writing or electronically. While the data subject's requests will be responded free of charge, in case such a response results in additional cost, the data subject may be charged with a fee in such amount set out in the relevant legislation.

### **III. COOKIES AND GENERAL TECHNOLOGIES**

#### **A. General**

During access to Is Yatirim web sites, electronic platforms, applications or electronic mail or advertisements sent by Is Yatirim, small data files may be embedded in the user's computers, mobile phones, tablets or other devices to record and collect specific data. These data files embedded in computers and other devices may be cookies, pixel tags, flash cookies and web beacons or other technologies used for data storage purposes. The term “*cookies*” will be used in this Policy to refer to cookies and similar technologies that Is Yatirim may use.

While it is possible to collect personal data by means of cookies, all personal data collected through cookies may not qualify as personal data. For this reason, it should be noted that data collected by means of cookies will be considered to fall under this Policy and PPD Law, to the extent they constitute personal data under Turkish law.

#### **B. Types of Cookies**

Cookies may be categorized by their life-span or domains they belong to. Where they are classified by life-span, they are divided into two groups: session cookies and permanent cookies. Session cookies refer to those deleted when the user closes the browser, while permanent cookies refer to those remaining at the user's computer for a pre-defined term.

If cookies are categorized by the domains to which they belong, they are again divided into two categories: related party cookies and third party cookies. Cookies embedded by the visited

website are called related party cookies, whereas cookies embedded by a website different than the visited website are referred to as third party cookies.

### C. Purpose of Use of Cookies

Is Yatirim may make use of cookies in its websites, platforms, applications, advertisements and communications for the following purposes:

- (i) **Uses for operational purposes:** We can use cookies that we consider necessary for the administration and security of Is Yatirim websites, platforms, applications and services. Examples for cookies used for operational purposes are technologies that allow making use of the functions of websites, applications and platforms and cookies used to identify irregular behaviours therein.
- (ii) **Uses for functionality purposes:** Cookies may be used to facilitate the use of Is Yatirim websites, platforms, applications and services and to customize them for users. Examples for cookies used for functionality purposes are technologies that allow recalling user details and preferences.
- (i) **Uses for performance purposes:** Cookies may be used to enhance and measure the performance of Is Yatirim websites, platforms, applications and services. Examples for cookies used for these purposes are those that help analysing user behaviours and understand how they use Is Yatirim website, applications, platforms and services and technologies that allow us to understand whether there has been an interaction with our communications.
- (ii) **Uses for advertising purposes:** We can use related party cookies and third party cookies in order to send advertisements and similar contents to users based on their areas of interest, through the websites, platforms and applications of Is Yatirim or third parties. Examples for cookies used for advertising purposes are those measuring the effectiveness of advertisements and those showing whether a specific advertisement is clicked or how many times it is viewed.

### D. Rejection and Deletion of Cookies

Although many browsers allow for the use of cookies, users may reject or delete cookies by changing their browsers settings whenever they like. The method to change settings may differ

based on the used browser, therefore we suggest checking with the browser provider to learn how to disable cookies.

Please be aware that certain features of Is Yatirim web site, applications, platforms and services may not be used, once cookies are disabled.

#### **E. Authorised Service Providers**

We may use authorized service providers that helps us with the operation and promotion of the websites, platforms and applications and services of Is Yatirim. These service providers may also place cookies and similar technologies in the user's computers/ devices, and collect information that helps them to identify the user's device, such as IP address, unique identifiers and device identifiers.

#### **IV. THIRD PARTY WEB SITES, PRODUCTS AND SERVICES**

Is Yatirim's web sites, platforms and applications may contain links to third party web sites, products and services. Such links are governed by their own privacy policies or notices, and it should be born in mind that third parties and third party web sites are independent of Is Yatirim and Is Yatirim is not responsible for third party operations and practices. We recommend you to learn about privacy practices of the linked websites that you visit.

#### **V. CHANGES**

We may amend this Data Protection and Privacy Policy from time to time. You may have access to the current version of the Policy at Is Yatirim's website and any amendments to the Policy may be followed at that website.

While any amendments to this Policy will normally be valid as of the date when they are uploaded to Is Yatirim website, Is Yatirim may notify any amendment in other ways it consider suitable.

**ANNEX-1****DATA SUBJECT APPLICATION FORM**

Is Yatırım Menkul Değerler Anonim Şirketi (“**Is Yatırım**”) has designed this Application Form in order to duly and timely evaluate applications that data subjects may submit pursuant to Article 11 of Law No: 6698 on the Protection of Personal Data (“**PPD Law**”).

You may submit any queries about the completion of this Form to us by dialling 0212 350 24 24 during office hours and days.

**I. Rights of the Data Subject**

Before you complete this Form, you may read *Is Yatırım Data Protection and Privacy Policy* available at [www.isyatirim.com.tr/en-us/](http://www.isyatirim.com.tr/en-us/) to learn more about your rights set out in Article 11 of PPD Law and the data process operation of Is Yatırım.

**II. Application Method**

In case you wish to use any of rights listed in Article 11 of PPD Law, you are required to complete this Form and submit, along with the annexes listed under section IV hereof:

- (i) one originally signed copy of the Form to İş Kuleleri Kule:2 Kat:12 34330 4. Levent, İstanbul personally, or
- (ii) one originally signed copy of the Form to İş Kuleleri Kule:2 Kat:12 34330 4. Levent, İstanbul via notary public, or
- (iii) the form with a secured electronic signature to [bilgi@isyatirim.com.tr](mailto:bilgi@isyatirim.com.tr).

**III. Information about Data Subject**

Please submit the information and documents requested below in full and accurate manner. The provision of such documents and information requested herein in full and complete form will help us to duly evaluate your application.

**Name and Surname** : \_\_\_\_\_

**ID No (Turkish Citizens)** : \_\_\_\_\_

**Address** : \_\_\_\_\_

**Phone Number** : \_\_\_\_\_

**Electronic Mail Address** : \_\_\_\_\_

Please check the most appropriate option below that best describes your relations with Is Yatirim, and use the space below to write about whether such relation is still active, or if it has been terminated, about the periods during which it was active, and the details of the directorate/branch that you are/were in contact, if any.

Investor	<input type="checkbox"/>	Business Partner	<input type="checkbox"/>
Employee	<input type="checkbox"/>	Visitor	<input type="checkbox"/>
Job Applicant	<input type="checkbox"/>	Other (_____)	<input type="checkbox"/>

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**IV. Requests by the Data Subject**

Please state type of your request(s) relating to your personal data by checking the appropriate box (X) below. You are also required to submit relevant information and documents in connection with your request listed below together with this Form,

<b>Request</b>	<b>Option</b>	<b>Documents/ Information to be provided</b>
I wish to know about whether my personal data have been processed by Is Yatirim.		If there is any specific data which, according to your knowledge, has been processed, please state it in the blank space at the end of this table.
I wish to know about the purpose underlying the processing of my personal data, if they are processed by Is Yatirim.		If there is any specific data which you wish to learn the purpose of processing it, please state it in the blank space at the end of this table.
I wish to know about the purpose why Is Yatirim processes my personal data, and whether if such data are used by Is Yatirim in line with this purpose.		If there is any specific data covered by your request, please state it in the blank space at the end of this table.
In case my personal data are transferred by Is Yatirim to third parties in or outside Turkey, I wish to know those third parties to which my personal data are transferred.		If there is any specific data covered by your request, please state it in the blank space at the end of this table.
I wish that my personal data processed by Is Yatirim inaccurately or incompletely are corrected.		Please state your personal data which, according to your knowledge, is processed inaccurately or incompletely and how you wish them to be

		corrected, in the blank space at the end of this table or as an annex hereto, and attach the photocopy of ID card, invoices, certificate of residence or alike supporting your request.
I wish that my personal data processed inaccurately or incompletely are corrected by third parties to which they have been transferred.		Please state your personal data which, according to your knowledge, is processed inaccurately or incompletely and how you wish them to be corrected, in the blank space at the end of this table or as an annex hereto, and attach the photocopy of ID card, invoices, certificate of residence or alike supporting your request, to this Form.
I wish that my personal data are deleted or destroyed as the reasons requiring for their process no more exist.		Please state such data which, according to your opinion, reasons for processing them no more exist and you wish us to delete or destroy, in the blank space at the end of this table or as an annex hereto, and attach the information/ documents supporting your request, to this Form.
I wish that my personal data are deleted or destroyed by third parties to which they have been transferred, as the reasons requiring for their process no more exist.		Please state such data which, according to your opinion, reasons for processing them no more exist and you wish us to delete or destroy, in the blank space at the end of this table or as an annex hereto, and attach the information/ documents supporting your request to, this Form.
I am in the opinion that my personal data processed by Is Yatirim has been analysed exclusively by means of automatic systems and that such analysis has resulted in consequences to my detriment, and I hereby object to such consequences.		Please state such data that, in your opinion, are analysed by means of automatic systems and work against you in the blank space at the end of this table or as an annex hereto, and attach such information/ documents supporting your request, to this Form.
I demand to get indemnified against the loss that I suffered due to unlawful process of my personal data.		Please state why you think that your personal data have been unlawfully processed, describe the unlawful processing operation as well as the loss suffered by you, in the blank space at the end of this table or as an annex hereto. You may attach the decisions of the Personal Data Protection Board of Turkey or courts, which support your request, to the Form.

Please state the information regarding your request required above and the documents attached to the Form below.

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## V. Response to Your Application and Its Notification

Is Yatirim will evaluate, and respond to, your request at latest within thirty days based on the nature of the request. Any favourable or unfavourable response to your request may be sent to you in writing or electronically. If you prefer that the response to your application is sent by means of either mail or electronic mail, please state your choice below along with the mail address/ electronic mail address to which the response is to be sent.

Please send the response to my application via electronic mail.

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Please send the response to my application via mail.

While your requests will be normally responded free of charge, in case such a response results in an additional cost, we may charge you with a fee in such amount set out in the relevant legislation.

If Is Yatirim needs any additional information to respond to your application or it cannot be verified that the application was made by you, Is Yatirim may contact you by using contact details herein or kept by Is Yatirim.

## VI. Statement

I hereby kindly request that my application that I submit pursuant to PPD Law is evaluated and responded based on my request referred to herein.

### Data Subject

Name Surname:

Application Date:

Signature: