



## NOTIFICATION ON THE PERSONAL DATA PROTECTION

As HSBC Bank A.Ş. (“**HSBC**” or “**Bank**”), the security of your information is one of our most important priorities. In this respect, we would like to inform you about personal data processed by our Bank in accordance with the Law On the Protection of Personal Data No. 6698 (“**Law**” made in order to protect the fundamental rights and freedoms of persons, as well as to protect personal data.

### 1. IDENTITY OF DATA CONTROLLER

Under the Law, HSBC Bank A.Ş. acts as a “Data Controller”. You can contact us using the contact details provided below:

**Address:** Esentepe Mah. Büyükdere Cad. No: 128 34394 Şişli / İstanbul

**MERSİS No.:** 0621002428200197

**Registration No:** İstanbul Trade Registry Directorate - 268376

**Web site:** [www.hsbc.com.tr/](http://www.hsbc.com.tr/)

### 2. PURPOSES OF PERSONAL DATA PROCESSING AND LEGAL BASIS

Within the framework of your relationship with our bank, your personal data is processed for the following purposes and relying on the corresponding legal basis for processing personal data (“legal basis”).

#### 2.1. On the legal basis that the processing is necessary so as to meet the legal obligations of the Bank as the data controller and explicitly stipulated by the laws;

- ❖ Ensuring the complete and due performance of our contractual and statutory duties,
- ❖ Complying with national and international principles and rules, and performing information retention, reporting, and informing liabilities stipulated by the legislation and official authorities,
- ❖ Authentication to ensure the security of customers, Bank and data, carrying out, recording and reporting controls regarding money laundering, bribery, fraud, financial crime and sanctions, raising suspicious activity reports,
- ❖ Meeting the requirements of authorized agencies and organizations,
- ❖ Planning the information security processes, as well as auditing and performing them,
- ❖ Making banking services accessible and suitable for the customers with disabilities,
- ❖ Performing reporting and auditing activities,

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- ❖ Performing credibility assessments; following up and controlling credit monitoring and repayment processes,
- ❖ Preparation of bank statements and investment statements and sending them to the customers, recording of voice calls,
- ❖ Managing the legal, financial, commercial, compliance and reputational risks,
- ❖ Evaluating and responding to the suggestions, requests and complaints sent through various channels,
- ❖ Following financial and accounting transactions, generating financial and business reports,
- ❖ Exchanging information with institutions and organizations, banks, prospective buyers or risk center stipulated within the framework of the provisions of the Banking Law No. 5411; drawing up consolidated financial statements of the main partnerships; executing risk management and internal audit activities; executing valuation activities to sell Bank assets or securities based on them, including but not limited to loans; executing valuation, rating or assistance services; executing independent audit activities and service purchases,

**2.2. Provided that it is directly related to the establishment or performance of a contract, on the legal basis of necessity to process personal data belonging to the parties to the contract so as to offer the requested products and services and meet the requirements of the contracts concluded,**

- ❖ Executing banking transactions; performing correspondent banking activities,
- ❖ Provision of products and services through online banking and our mobile app,
- ❖ Provision of our products and services within the scope of banking, finance, investment, portfolio management, realizing the instructions you submit about our products and services, making transfers of securities such as currency, foreign exchange and gold; executing payment transactions,
- ❖ Making international money transfers, processing payment objections related to transactions made via credit cards abroad, collecting foreign checks,

**2.3. Provided that no harm is caused to the fundamental rights and freedoms of the data subjects, on the legal basis of where the data processing is necessary for the legitimate interests of data controller,**

- ❖ Making improvements in line with the suggestions, requests and complaints sent through various channels and; delivering the quality standards for customer services; recording conversations made through the call center accordingly and listening to and analyzing these records by our authorized units when necessary,
- ❖ Following financial and accounting transactions, generating financial and business reports,
- ❖ Executing customer relations activities,
- ❖ Analyzing how our services are utilized by you and improving our products and services accordingly,
- ❖ Ensuring the continuity of security and activities; performing activity analyses, enhancements and performance measurements,
- ❖ Maintaining social responsibility activities that our bank is involved in,
- ❖ Management and recording of communications with our bank,
- ❖ Conducting effectiveness and expediency analyses for our commercial operations; planning and execution of such operations,
- ❖ Carrying out controls regarding money laundering, bribery, fraud, financial crime and sanctions,
- ❖ Managing the legal, financial, commercial, compliance and reputational risks,
- ❖ Conducting market research and executing segmentation activities.

**2.4. On the legal basis of where the data processing is necessary to establish, use or protect a right;**

- ❖ Contract management, initiating legal transactions and following up on legal processes,
- ❖ Planning and/or execution of activities related to establishing, sustaining and/or discharging collaterals,
- ❖ Managing the legal, financial, commercial, compliance and reputational risks faced by our bank; taking necessary steps to protect our rights in disputes to which we are a party of,

## 2.5. On the basis of your explicit consent,

- ❖ Within the scope of marketing, advertising and promotion activities, provided that you give consent creating special products or campaigns, identifying and recommending products or services the Bank considers that you may be interested in or that you may require; Making banking services accessible and suitable for the customers with disabilities.

## 3. TRANSFER OF THE PERSONAL DATA

Your personal data can be shared with authorized agencies and organizations including but not limited to The Banks Association of Turkey Risk Center, Credit Reference Agency, Banking Regulation and Supervision Agency, Capital Markets Board, Central Bank of Turkey, Financial Crimes Investigation Board, Ministry of Treasury and Finance, Financial Crimes Investigation Board, Inter-Bank Card Center, Banking Association of Turkey, Central Registrar, law enforcement agencies, courts and enforcement directorates, domestic and international banks and clearing entities that provide intermediary/custody services for domestic and foreign currency and securities transfer, securities custody requests, and HSBC group companies (referring to HSBC Holdings plc and/or its affiliates, subsidiaries, joint ventures and any branches and offices thereof) in Turkey or overseas, third parties we serve as intermediaries and agents of, correspondent banks with which we cooperate, business partners, shareholders of our Company, service provider firms, vendors and support service providers and staff, officials, and subcontractors thereof, for the purposes specified in article 2 of the present Notification Text, within the framework of the provisions of the Law, covering the transfer of personal data within the country and abroad.

## 4. PERSONAL DATA COLLECTION METHODS AND THE LEGAL GROUNDS

Your personal data is collected on physical, written, verbal and electronic media, via the internet, phone, e-mail and mobile app, during your applications for products and services, visits to our head office, web site and branches, use of mobile app, ATM and online banking, and your calls with the call center, from you, The Banks Association of Turkey Risk Center, Credit Risk Center, the Identity Sharing System, legal entities that you are related and/or connected with, legal authorities and sources available to the public during the establishment and maintenance of the legal relationship with our Bank. The collected personal data is processed based on the following legal grounds stipulated in Articles 5 and 8 of the Law:

- ❖ There is an express consent;
- ❖ The binding legislation for our Bank clearly stipulates so;

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- ❖ Provided that it is directly related to the establishment or performance of a contract, the existing of a necessity to process personal data belonging to the parties to the contract so as to offer the requested products and services and meet the requirements of the contracts concluded;
- ❖ It is compulsory so as to meet the legal obligations of the data controller;
- ❖ Data processing is necessary to establish, use or protect a right;
- ❖ Data processing is necessary for the legitimate interests of data controller, provided that no harm is caused to the fundamental rights and freedoms of the relevant person.

In case of personal data transferring to overseas countries, in addition to the abovementioned legal grounds, personal data can only be transferred abroad if the respective foreign country

- ❖ offers adequate protection;
- ❖ and, in case there is no adequate protection, if HSBC and the respective data controller in the foreign country to which data will be transferred guarantee adequate protection in writing and if the Personal Data Protection Board gives its approval or
- ❖ you have given your explicit consent for your personal data to be transferred abroad

## 5. WHAT ARE YOUR RIGHTS?

You have the following rights concerning your personal data, as per the provisions in Article 11 of the Law.

- ❖ To find out whether your personal data has been processed or not;
- ❖ To request relevant information if your personal data has been processed;
- ❖ To find out the grounds for processing your personal data, and whether it is used for the intended purpose;
- ❖ To learn about the third parties to whom your personal data is transferred at home or abroad;
- ❖ To demand correction in the event of incomplete or incorrect processing of your personal data;
- ❖ To demand the deletion or destruction of your personal data;
- ❖ To demand the notification of the third parties to whom personal data was transferred, about any personal data correction, deletion or destruction;
- ❖ To object to any outcome to the detriment of the person involved, through the analysis of processed data exclusively via automatic systems;

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- ❖ To demand damages should any losses be incurred due to the illegal processing of personal data.

## 6. CONTACTING US FOR YOUR RIGHTS AND REQUESTS

You can either personally submit your requests to our branches in writing or send them through a notary public as per your legal rights. You can also send an e-mail to [hsbcbank@hs04.kep.tr](mailto:hsbcbank@hs04.kep.tr) using registered electronic mail (KEP) address, secure electronic signature, mobile signature, or to [kvkkiletisim@hsbc.com.tr](mailto:kvkkiletisim@hsbc.com.tr) using the electronic mail address previously reported to our Bank and registered in our systems.

The application must include (i) name, surname and, if in writing, signature; (ii) Republic of Turkey identification number for citizens of the Republic of Turkey, and nationality, passport number or, if any, identification number for foreigners; (iii) residential area or workplace address provided for correspondence; (iv) if any, electronic mail address, telephone and fax numbers provided for notification and (v) subject of the request.

Applications made within this scope are accepted following an identification verification by us, and your requests stated in the application are concluded as soon as possible and within 30 days at the latest depending on the type of requests.

## 7. THINGS YOU CAN HELP WITH

It is important that the personal data we keep about you should be correct and up-to-date. To this end, we kindly ask you to inform us of any change to your personal data using our abovementioned contact details.

If you share with our Bank any personal data not belonging to you, you should make sure that this Notification Text is referred to and read by them so that they can have knowledge about the use of their personal data.

If you would like to get further information regarding personal data you can always reach us via the abovementioned contact details or visit Personal Data Protection Agency's website by clicking <https://www.kvkk.gov.tr/>.

**The Privacy Notification hereby is an annex to the Banking Transaction Agreement executed with HSBC Bank A.Ş. and constitutes an integral part of it.**

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## EXPLICIT CONSENT TEXT REGARDING THE USE OF PERSONAL DATA

For detailed information regarding the personal data processed by HSBC Bank A.Ş. (“**HSBC**” or the “**Bank**”) in accordance with the Personal Data Protection Law No. 6698 (the “**Law**”), please read the “*Notification Text Regarding the Law on the Protection of Personal Data*”.

You may state your preference below as how you would like your personal data obtained as part of your relationship with HSBC to be used and shared.

Please contact our Bank if you would like to obtain further information regarding the Law on the Protection of Personal Data or withdraw your consent.

### ❖ **Marketing Activities**

I hereby give my consent for my personal data to be processed and shared with affiliates and business partners for the purposes of establishing tailor-made products, campaigns and special offers; as well as identifying and providing the products or services I may be interested in or need to use, within the framework of the services offered by HSBC and under intermediary scheme and except for the activities that do not require an explicit consent as per the Law.

### ❖ **Cross Border Data Sharing**

I hereby consent to the sharing of my personal data as supplementary data with overseas HSBC Group companies<sup>1</sup>, companies providing services, suppliers, support service providers, potential buyers, governmental and private institutions and organizations for the following purposes: under the provisions of the Banking Law No. 5411; executing the valuation activities to be performed by potential buyers; preparing consolidated financial statements; executing risk management and internal audit activities; executing valuation activities to sell Bank assets or securities based on them, including but not limited to loans; executing valuation, rating or assistance services; executing independent audit activities and service purchases and sharing data in line with the permission, approval or orders given by the Banking Regulation and Supervision Agency.

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<sup>1</sup> Refers to HSBC Holdings plc and/or its subsidiaries, affiliates, joint ventures and all branches and offices of the same.

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## ❖ Disability Status Information

I hereby consent to the processing of my personal data, including my healthcare information, and the document that I will submit regarding my disability status, in order to make banking services accessible and suitable for customers with disabilities in accordance with the *Regulation on the Accessibility of Banking Services*.

**DATE:**

**CUSTOMER NAME-SURNAME:**

**I hereby give my consent**

**I hereby do not give my consent**

SIGNATURE

SIGNATURE