



PERSONAL DATA PROTECTION NOTIFICATION TEXT FOR PROSPECTIVE EMPLOYEES REGARDING PROTECTION OF PERSONAL DATA

At HSBC Bank A.Ş. (“**HSBC**” or the “**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

HSBC Bank A.Ş. and its affiliates act as a Data Controller within the scope of the Law. You can contact us using the contact details provided below:

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

MERSİS No: 0621002428200197

Registry No: İstanbul Ticaret Sicil Müdürlüğü-268376

Web Site: www.hsbc.com.tr/

2. PERSONAL DATA CATEGORIES AND PROCESSING PURPOSES

(i) **Assessment Period for Job Applications:** Identity information, contact details, resumes, educational background and job experience details, professional capabilities, and interview assessment details, as well as information provided by employment candidates during applications and interviews are processed for the following purposes during the assessment period regarding job applications to our Bank:

- ❖ Conducting an assessment to see whether the qualifications meet the requirements of the position;
- ❖ Measuring the likeliness of the candidate to fit the job;
- ❖ Contacting the candidate to set a time for an interview and sending interview invitations;
- ❖ Obtaining additional information and documents when necessary;
- ❖ Working on remuneration and job offer procedures;
- ❖ Contacting references for reference check purposes;
- ❖ Keeping the provided details for a reasonable period of time so as to allow for a future assessment for similar or relevant positions and contacting the candidate in case of such situation.

(ii) **Conducting Security Investigations and the Job Offering Process:** Any job application to our Bank requires certain pre-checking procedures so as

to conclude the process and offer the job. After you accept the job offered by HSBC you will be subject to security checks which may be repeated on a periodical basis throughout the term of your employment. In case a job application results in success after an assessment, certain information depending on the characteristics of the applied position and including identity information, family status details, residential area details, work permit, references, conflicts of interest (relatives working at HSBC and/or previous job experience as the Bank's inspector), criminal record for the last five years, credit history for the last five years, information as to whether the employment candidate or their relatives are public officials¹, employment status and service scheme for the last five years, diploma and educational background details, citizenship details, disability status, photo, medical report, vocational documents and certificates, military service status, information regarding any external board membership for the last five years and data regarding media control, provided that public information is used¹, as well as answers to the questions on the candidate application form are processed for the following purposes:

- ❖ Checking whether the candidate is a good fit for the position;
 - ❖ Conducting the checks aimed at preventing money laundering, bribery, fraud, credit risk, financial crimes and sanctions;
 - ❖ Ensuring the complete and due performance of our 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;
 - ❖ Determining disability/incapacity status;
 - ❖ Carrying out the media control, provided that public information is used;
 - ❖ Carrying out the recruitment procedures and preparing the newly hired employee's personnel file when a job application process results in success;
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- ❖ Carrying out medical checks to see whether the candidate suffers from any medical condition that may prevent them from working at the respective position;
 - ❖ Checking the sanctions monitoring lists;
 - ❖ Conducting a credit risk assessment.

¹ The term public official covers persons working at any role and position in a public institution including those politically exposed persons.

² For certain roles at HSBC, Enhanced Vetting must be carried out. These roles are those that may cause serious harm to HSBC in case the person holding the relevant position abuses their role. In case the position applied by employment candidates requires Enhanced Vetting, information regarding any external board membership and data regarding media control, provided that public information is used, are processed by notifying the respective party in advance.

3. TRANSFER OF THE PERSONAL DATA PROCESSED

Under the provisions of the Law regarding the transfer of personal data and their transfer to overseas countries, your personal data can be shared with authorized institutions and organizations, law enforcement officers, courts, the HSBC Group Companies both at home and abroad (refers to HSBC Holdings plc and/or its subsidiaries, affiliates, joint ventures and all their branches and offices), correspondent banks that we collaborate with, business partners, our Company shareholders, subsidiaries, affiliates, joint ventures and their branches and offices, service providing companies, suppliers and support service providing companies and their employees, authorized persons and subcontractors, as well as institutions and organizations issuing diploma/graduation certificates, for purposes stipulated in Article 2 of this Personal Data Protection Notification Text.

If the employment candidate has resided in a different country for more than six months in the last five years, then criminal record, credit history and lawsuit checks are also conducted in such countries.

4. PERSONAL DATA COLLECTION METHODS AND THE LEGAL GROUNDS

Your personal data are collected directly from you and/or via the relevant career portals during your application to HSBC or any job postings available on the HSBC career portals, during interviews or via candidate application forms, and, in addition, they are also collected via the internal systems of HSBC and its group companies while they conduct checks on their own database related to credit risks and fight against fraud and money laundering or via physical, printed, verbal and electronic mediums provided that they are public media sources. The collected personal data are processed based on the following legal grounds stipulated in Articles 5, 6 and 8 of the Law:

- ❖ There is an express consent;
- ❖ The binding legislation for our Bank clearly stipulates so;
- ❖ 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 liability;
- ❖ Data processing is necessary to establish, use or protect a right;
- ❖ It is made public by the related person themselves;
- ❖ 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;
- ❖ Personal data regarding medical conditions should be processed by persons under confidentiality obligation or authorized institutions and organizations for the purpose of medical diagnosis.

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

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 have been processed or not;
- ❖ To request relevant information if your personal data have been processed;
- ❖ To find out the grounds for processing your personal data, and whether they are used for the intended purpose;
- ❖ To learn about the third parties to whom your personal data are 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 were 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;
- ❖ To demand recovery of losses should any losses arise due to 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. In addition, you can also send them to hsbcbank@hs04.kep.tr provided that you use a registered electronic mail (KEP) address, secure electronic signature and mobile signature or to kvkkiletisim@hsbc.com.tr through your e-mail address which is declared to the Bank previously and registered to 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. In case your application is responded to in writing, no fee is charged for up to 10 pages but, for each page exceeding the 10-page limit, 1 Turkish Lira may be charged as a transaction fee. In case your application is responded to in a recording medium such as a CD or flash disk, a fee amounting to the cost of the recording medium may be asked.

7. THINGS YOU CAN HELP WITH

It is important for the personal data we keep about you are 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.

In case you share with our Bank any personal data not belonging to you, you should make sure that this Personal Data Protection 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/>.

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INTERNAL

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