



PRIVACY NOTICE FOR PROSPECTIVE EMPLOYEES REGARDING PROTECTION OF PERSONAL DATA

At HSBC (“**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**”) issued 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 affiliates¹, depending on which HSBC entity you are applying to, act as a Data Controller within the scope of the Law. You can contact us using the contact details provided below:

HSBC Bank A.Ş. - MERSİS No: 0621002428200197 - **Sicil No:** İstanbul Ticaret Sicil Müdürlüğü-268376 www.hsbc.com.tr/

HSBC YATIRIM MENKUL DEĞERLER A.Ş. - MERSİS No: 3771926852312196- **Sicil No:** İstanbul Ticaret Sicil Müdürlüğü-359071-306653 www.hsbcyatirim.com.tr/

HSBC PORTFÖY YÖNETİMİ A.Ş.- MERSİS No: 8871595342677462-**Sicil No:** İstanbul Ticaret Sicil Müdürlüğü-503189-450771 www.hsbcportfoy.com.tr/

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

2. PERSONAL DATA CATEGORIES AND PROCESSING PURPOSES

2.1. Assessment of Job Applications:

Personal Data Categories	Personal Data Processing Purposes	Legal Grounds
❖ Identity information; ❖ Contact details (including HSBC location visited); ❖ Personnel information; ❖ Educational background and job experience	❖ Conducting an assessment to see whether the qualifications meet the requirements of the position; ❖ Measuring the likeliness of the candidate to fit the	Performance of a contract Compliance with a legal obligation Legitimate interests of the data controller

¹ HSBC Portföy Yönetimi A.Ş. and HSBC Yatırım Menkul Değerler A.Ş. are affiliates of HSBC Bank A.Ş. They will all be referred as “HSBC”.

details; ❖ Professional capabilities; ❖ Interview assessment details; ❖ Information provided by employment candidates during applications and interviews (for instance, reference information)²; ❖ Audio and visual recordings (if the interview is conducted via video call); ❖ Correspondences and communications during the application and interview process.	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; ❖ Storing 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; ❖ Use of artificial intelligence in recruitment processes; ❖ Fraud detection and prevention ❖ Ensuring business continuity and security ❖ Managing risks within the scope of recruitment processes ❖ Protecting our rights and fulfilling our legal obligations within the scope of recruitment processes	Establishment, use or protection of a right Made public by the data subject Explicit consent (if required)
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2.2. 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

² If you provide reference information as part of your job application, you should ensure that the persons you provide reference information are informed about the matters set out in this privacy notice and that they have consented for disclosure of their information with HSBC.

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, the below personal data depending on the characteristics of the applied position will be processed for following purposes.

Personal Data Categories	Personal Data Processing Purposes	Legal Grounds
❖ Identity information (including name, surname, maiden name and surname changed with a court order); ❖ Family status details (including marital and family status information); ❖ Residential area details (current and previous residential addresses); ❖ Work permit; ❖ References and conflicts of interest (relatives working at HSBC and/or previous job experience as the Bank's inspector); ❖ Judicial and financial background (Criminal record for the last five years, credit history for the last five years); ❖ Public official status³ (information as to whether the employment candidate or their relatives are public officials); ❖ Employment background (service scheme for the last five years); ❖ Education and professional qualification information (diploma and educational background details, vocational	❖ 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; ❖ Carrying out medical checks to see whether the candidate suffers	Performance of contract Compliance with a legal obligation Legitimate interests of the data controller Establishment, use or protection of a right Explicit consent (if required in relation to criminal record data) It is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance (if necessary, health data and data on disability status) Explicitly stipulated in the legislation to which our Bank is subject to Made public by the data subject

³ The term public official covers persons working at any role and position in a public institution including those politically exposed persons.

documents and certificates); ❖ Citizenship details and military service status; ❖ Health and disability status; ❖ Visual data; ❖ External relations and publicly available resources (information regarding any external board membership for the last five years and data regarding media control, provided that public information is used ⁴); ❖ Answers to the questions on the candidate application form.	from any medical condition that may prevent them from working at the respective position; ❖ Checking the sanctions monitoring lists; ❖ Conducting a credit risk assessment.	
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3. TRANSFER OF THE PERSONAL DATA PROCESSED

Under the provisions of the Law regarding the transfer and cross-border transfer of personal data and for purposes stipulated in Article 2 of this Privacy Notice, your personal data can be shared with authorized institutions and organizations, law enforcement officers, courts and dispute parties, 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 provider companies, suppliers and support service provider companies and their employees, authorized persons and subcontractors, institutions and organizations issuing diploma/graduation certificates, any person or company required in connection with a potential or eventual corporate restructuring, merger, acquisition or takeover that may result in the transfer or potential transfer of any of our rights or duties under our contract with you, and parties with whom you have consented to the sharing of your information.

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 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.

4. PERSONAL DATA COLLECTION METHODS

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 legal grounds stipulated in Articles 5, 6 and 8 of the Law.

Your personal data is transferred abroad in accordance with Article 9 of the Law. HSBC complies with all data transfer obligations under the Law and takes steps to ensure that there is adequate protection in case of transfer outside Türkiye in accordance with the Law and the relevant secondary legislation. In particular, these steps may include signing standard contractual clauses for the transfer of personal data abroad as determined by the Personal Data Protection Authority ("**Authority**") or, in the case of occasional transfers, ensuring that the transfer is based on legal grounds under Article 9(6) of the Law.

In addition, if you apply for a job by using HSBC's career portals, you will directly transfer your personal data abroad since the servers of these portals are located abroad. If you do not want your personal data to be transferred abroad through career portals, you can submit your applications through alternative job application channels offered to you by HSBC.

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, hsbcyatirimmenkuldegerler@hs03.kep.tr, hsbcportfoyyonetim@hs03.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 Türkiye identification number for citizens of the Republic of Türkiye, 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 Privacy Notice 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/>.