

**TACİRLER YATIRIM MENKUL DEĞERLER A.Ş.**

**PROTECTION OF PERSONAL DATA AND**

**PRIVACY POLICY**

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# OUR PERSONAL DATA PROTECTION AND PRIVACY POLICY

## I. INTRODUCTION

### PUBLICIZING GENERAL POLICIES

Tacirler Yatırım Menkul Değerler A.Ş. (hereinafter referred to as "Tacirler Yatırım" or the "Institution") attaches great importance to the protection of the personal data shared with our Institution by our customers, shareholders, business partners, employees and other natural persons who contact Tacirler Yatırım on their behalf or as a proxy or as a representative of a company or organization, and who establish a relationship with us by applying for a job or visiting our websites or through other communication methods. In this context, our Institution, which is the data controller within the framework of the Law No. 6698 on the Protection of Personal Data (KVKK), shares with the public the rules and policies it has implemented on the processing of personal data and the use of cookies and similar technologies with the "Personal Data Protection and Privacy Policy" (Policy) detailed below.

### SPECIAL POLICIES AND ANNOUNCEMENTS

Considering the type and nature of the relationship between Tacirler Yatırım and the data owner, it may be possible for Tacirler Yatırım to apply a personal data policy and/or provide notifications to data owners different from the Policy herein, if necessary. In the event that there are any additional or different issues from this special policy and notifications to be applied to data subjects and from our Policies and explanations herein, the special policies and notifications provided to data subjects should be taken into consideration.

## II. PERSONAL DATA

### A. What is Personal Data?

Personal Data refers to all kinds of information relating to real persons whose identity is certain or identifiable. (Art.3/(1)(d) of KVKK)

### B. Information and Data Not Considered Personal Data

"anonymized information", "anonymized information" and

"other data that cannot be associated with a specific person" is not considered personal data.

### **C. Processing of Personal Data**

Processing of Personal Data is defined as any operation that may be performed on personal data, such as obtaining, recording, storing, retaining, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, in whole or in part, automatically or by non-automatic means, provided that it is part of any data recording system. (Art.3/(1)(e) of KVKK)

### **D. General Principles on the Processing of Personal Data**

Tacirler Yatırım aims to process personal data for the purposes stated in the Policy, "in accordance with the law and rules of honesty", "in accordance with the law and good faith", "by making every effort to ensure that it is accurate and up-to-date", "for specific, explicit and legitimate purposes in accordance with the activities of the Institution and "in connection with, limited to and proportionate to the purpose for which they are processed", in a manner to be kept for the period stipulated in the relevant legislation or required for the purpose for which they are processed". (KVKK art.4/(2)(a, b, c, d))

### **E. Conditions for Processing Personal Data and Explicit Consent**

Tacirler Yatırım does not process personal data without the explicit consent of the data subject. However, "it is explicitly stipulated in the laws", "it is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid", "it is necessary to process personal data of the parties to a contract, provided that it is directly related to the establishment or performance of a contract", In the presence of one of the following conditions: "it is mandatory for the data controller to fulfill its legal obligation", "it has been made public by the data subject himself/herself", "data processing is mandatory for the establishment, exercise or protection of a right, "data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject", it may be possible to process personal data without seeking the explicit consent of the data subject. (KVKK art.5/(2)(a, b, c, d, e, f))

### **F. What is Sensitive Personal Data?**

"Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data" are sensitive personal data (Article 6/(1) of the LPPD).

## **G. Conditions for Processing Sensitive Personal Data**

Tacirler Yatırım does not process sensitive personal data without the explicit consent of the data subject. However, special categories of personal data other than "health and sexual life" such as "race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, criminal convictions and security measures, and biometric and genetic data" may be processed by Tacirler Yatırım without the explicit consent of the data subject in cases stipulated by law and provided that "adequate measures determined by the Board are taken".

In cases where it is required to process "personal data relating to health and sexual life" in accordance with the limitations imposed by the legal legislation, "only for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing" and only "by employees authorized by Merchants Investment within the scope of confidentiality obligation or by institutions and organizations authorized by law" can be shared without seeking the explicit consent of the person concerned (Art. 6/(2, 3, 4)

## **H. Processing of General Qualified Data by Merchant Investments**

- a.** The following types of data may be processed by Tacirler Yatırım in line with the principles set forth in this Policy.
- b.** Depending on various factors such as the type and nature of the relationship between the data subject and Tacirler Yatırım and the communication channels used, which data will be processed may vary on the basis of the data subject and, if any, his/her parent, guardian and proxy notified to our records.
- c.** Information to identify the data subject, such as name, surname, occupation, title, information about the institution/organization, educational status, work history, gender, marital status, citizenship, tax liability, judicial or population archive record information and, if any, data of the same nature belonging to the parent, guardian and proxy,
- d.** Data such as date of birth, place of birth, identification number, blood type, marital status, religion and photographs in documents for personal identification and identification, such as identity cards, passports and driver's licenses,
- e.** Contact information such as address, e-mail, telephone and fax number of home, workplace or temporary place of residence; other personal information contained in

documents and invoices accepted as address confirmatory documents,

- f. Investment objectives, risk and return preferences, knowledge and experience in capital markets, data containing detailed financial preferences and tendencies such as the amount of savings that can/is allocated to capital market transactions, products and services determined to be suitable for the data subject, investment services and ancillary services used by the data subject, domestic and foreign markets traded, products traded, frequency and volume of transactions, investment institutions, correspondent banks,
- g. Communication records and other audio and video data such as face-to-face and telephone conversations, wet written or electronic mail correspondence with Traders Investment,
- h. Internet protocol (IP) address of the devices used, device ID, unique identifier information, device type, advertisement ID, unique device icon, statistics on web page views, incoming and outgoing traffic information, routing URL, internet log information, location information, visited sites and all kinds of electronic traces left on our websites, all kinds of information regarding the transactions and actions carried out through our other platforms, our internet network and our advertising and electronic mail content.

#### **i. For Which Purposes Do We Process Personal Data?**

Tacirler Yatırım may process personal data for the purposes stated below for as long as required.

- a. Fulfillment of legal and administrative obligations by Tacirler Yatırım,
- b. Negotiation, establishment and performance of contracts concluded/intended to be concluded,
- c. Identifying suitable products, services and platforms for investors, customizing and developing them for investors, and providing effective customer service,
- d. Ensuring and improving coordination, cooperation and efficiency in or between units within Tacirler Yatırım,

- e. The website belonging to Tacirler Yatırım or used by Tacirler Yatırım, other  
Ensuring the security of electronic systems and physical environments,
- f. Notification of changes in the legal legislation or in the rules and policies adopted  
by Tacirler Yatırım or other notifications concerning the data subject,
- g. Promotion and marketing of Tacirler Yatırım or Tacirler Yatırım's services and  
products and their development, obtaining the opinion of the data subject through  
surveys and polls,
- h. Promotion and realization of birthday celebrations, inclusion in sweepstakes or  
contests, gift giving and other similar events, promotions and campaigns in favor of  
the data subject,
- i. Investigation, detection and prevention of breaches of contract and law and related  
administrative  
or to be reported to the judicial authorities,
- j. Resolution of existing and future legal disputes,
- k. Realization of company and partnership law transactions,
- l. Determining the need for employees within the framework of Tacirler Yatırım's  
human resources policies, providing them and conducting, developing and  
improving recruitment processes,
- m. Evaluating and finalizing the eligibility of job applications and contacting job  
applicants,
- n. Tacirler Yatırım's sales, marketing, advertising, corporate communications, human  
resources and public relations
- o. development and improvement of relations policies,
- p. Data processing is mandatory for the establishment, exercise or protection of a  
right,
- q. Provided that it does not harm the fundamental rights and freedoms of the data  
subject, Merchants Ensuring, maintaining and protecting the legal and legitimate

interests of the Investment is in question,

- r. Answering the requests and questions of the data subject.

#### **J. Transfer of Personal Data within and outside Turkey**

As Tacirler Yatırım, provided that we comply with the general principles listed in Article 4 of the KVKK, comply with the conditions stipulated in Articles 8 and 9 and take the necessary security measures, we may transfer personal data to domestic and foreign third parties in line with the purposes set out under the heading "Purposes of Processing Personal Data" of our Policy; We can process and store personal data on servers or other electronic media located in Turkey and abroad.

In addition, since we need to comply with the relevant legislation and / or directives of the regulatory authorities / organizations due to the fact that they are subject to capital and financial markets legislation and tax legislation in the countries where the relevant stock exchanges where your transactions are carried out with foreign institutions with which we have business partnerships within the scope of brokerage services for trading transactions in foreign markets upon customer request, we may transfer your personal data abroad as a result of your Explicit Consent Declaration in Annex-2 in accordance with the procedures and principles regarding the implementation of Article 9 of the Personal Data Protection Law No. 6698 regulating the transfer of personal data abroad.

Although the third parties to whom personal data may be transferred may vary depending on various factors such as the type and nature of the relationship between the data subject and Tacirler Yatırım and the markets in which transactions are carried out, they can generally be summarized as shown below.

- a. Companies belonging to the Group to which Tacirler Investment is affiliated,
- b. Capital Markets Board, Borsa Istanbul, Takasbank, Central Registry Agency and other regulatory authorities in Turkey and abroad, exchanges, central clearing, settlement and custody institutions, central counterparty institutions and



organizations and third parties authorized by other authorized institutions and organizations,

- c. Investment institutions, custody institutions, platform owners, data broadcasting organizations, infrastructure providers and other business partners, suppliers and subcontractors that Tacirler Yatırım works with in Turkey and abroad,
- d. In the event that Tacirler Yatırım or its Group is restructured or Tacirler Yatırım is subject to transactions such as merger, spin-off or change of control, third parties to the relevant transactions.

#### **K. Method of Collection of Personal Data and Legal Basis**

Tacirler Yatırım may obtain personal data in written, verbal, audio or video recording or in other physical or electronic forms for the purposes specified under the heading "Purposes of Processing Personal Data" of our Policy within the framework of the conditions set out in Articles 5 and 6 of the LPPD. Personal data may be collected through headquarters, branches, investment centers, liaison offices, offices and other physical environments, call centers, websites, mobile applications, electronic transaction platforms, social media and other public channels or organizations such as trainings, conferences and similar events, visits and invitations or surveys and inquiries.

Although Tacirler Yatırım generally obtains personal data from data subjects, within the framework of the conditions specified in Articles 5 and 6 of the LPPD, it is also possible to obtain personal data through other group companies in the Tacirler Group, persons and institutions contracted by Tacirler Yatırım, subcontractors, persons, institutions and organizations shown as references in job applications or included in the applicant's work and education history, recruitment platforms, companies and investment institutions where the investor works, and persons and institutions represented by the data subject/representing the data subject.

#### **L. Retention Period of Personal Data**

Except in cases where a longer period is required or permitted by law, Tacirler Yatırım retains personal data only for the period necessary to fulfill the purposes specified in our Policy. Personal data whose retention period has expired shall be deleted by Tacirler Yatırım in

accordance with Article 7 of the LPPD and the Deletion of Personal Data, It is deleted, destroyed or anonymized within the scope of the Regulation on the Procedures and Principles Regarding the Destruction or Anonymization.

<b>PROCESS</b>	<b>STORAGE TIME</b>	<b>DISPOSAL PERIOD</b>
Company Operations	10 years	The first day after the end of the storage period during the period of periodic destruction
Preparation of contracts	10 years following the end of the contract	At the first periodic destruction following the end of the storage period
Company Contact Execution of Activities	10 years after the end of the activity	At the first periodic destruction following the end of the storage period
Human Resources Processes Execution	10 years after the end of the activity	At the first periodic destruction following the end of the storage period
LogRecord Tracking Systems	10 years	The first day after the end of the storage period during the period of periodic destruction
Execution of Hardware and Software Access Processes	2 Years	At the first periodic destruction following the end of the storage period
Visitors and Meeting Following the end of the event and the end of the retention period		
<b>PROCESS</b>	<b>STORAGE TIME</b>	<b>DISPOSAL PERIOD</b>
Registration of Participants	following 2 Years	during the first periodic destruction
Camera Recordings	2 Years	Following the end of the storage period during the first periodic destruction

#### **M. Personal Data Security and Audit**

Within the framework of Article 12 of the LPPD, Tacirler Yatırım, as the data controller, takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data and unlawful access to data and to ensure the protection of personal data. For this purpose, by Tacirler Yatırım;

- a. It is aimed to carry out Tacirler Yatırım business processes, services and activities in accordance with our policies and rules prepared for the protection of personal data,
- b. Work and training activities are carried out to raise awareness among employees about the KVKK and its legislation, as well as our internal policies and rules prepared within this framework,

- c. Employees of Tacirler Yatırım and persons who process data on behalf of Tacirler Yatırım and necessary declarations and commitments are received from organizations and our business partners for the confidentiality and protection of data, and these declarations and commitments are linked to certain sanctions,
- d. In accordance with the KVKK, necessary information security measures are taken to ensure the security of personal data inside and outside the company and to prevent unauthorized access to data.
- e. The compliance with our policy and rules established for the protection of personal data within the framework of the KVKK is audited at certain periods and the results are regularly monitored and submitted to our Board of Directors is reported,
- f. The adequacy of all measures taken within the framework of KVKK is checked periodically, and it is aimed to benefit from internal and external developments to improve our existing data security system.

**N. Rights of the Data Subject Pursuant to KVKK**

Pursuant to Article 11 of the PDP Law, data subjects have the right at Tacirler Yatırım:

- a. Learn whether their personal data is being processed,
- b. Request information if their personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. Correction of personal data in case of incomplete or incorrect processing  
Don't ask,
- f. To request the deletion or destruction of personal data in the event that the reasons requiring their processing disappear,
- g. Third parties to whom personal data are transferred for rectification and deletion

request to be notified,

- h. To object to the emergence of a result that is to your detriment by analyzing the processed data exclusively through automated systems, In case of damage due to unlawful processing of personal data, to demand compensation for the damage.  
rights.

In case the data subjects wish to exercise any of the above-mentioned rights,

Fill out the application form attached to our Policy and

- a. A wet signed copy of the form should be sent to Tacirler Yatırım Menkul Değerler AŞ. Nispetiye Cad. B3 Blok Kat 9 Akmerkez Etiler / ISTANBUL in person or through a notary public or
- b. They should send the form to the e-mail address kvkk@tacirler.com.tr.
- c. The Personal Data Protection Board may also receive requests via other methods.  
If Tacirler Yatırım decides to forward the applications, the ways in which the applications can be forwarded will be announced separately.

Tacirler Yatırım's response to requests from data subjects:

Within the framework of Article 13 of the LPPD, Tacirler Yatırım will evaluate the request within thirty days at the latest, depending on the nature of the request received from data subjects. Our positive or negative responses may be notified to data subjects in writing or electronically. In principle, the requests of the data owners will be finalized free of charge, and if the response requires an additional cost, a fee may be charged in the amounts determined within the framework of the relevant legislation.

### **III. COOKIES AND SIMILAR TECHNOLOGIES**

#### **A. General Information on the Use of Cookies**

In our Policy, "cookie" refers to the placement of cookies, pixel tags, flash cookies and web beacons, small data files with other similar technologies for data storage purposes, such as cookies, pixel tags, flash cookies and web beacons, which enable the recording and collection of certain data during access to Tacirler Yatırım's websites, electronic platforms, applications or

electronic mail messages or advertisements sent by Tacirler Yatırım, on users' computers, mobile phones, tablets or other devices used, in order to improve service quality by better recognizing individuals expression is used.

Since not all data collected through cookies may qualify as personal data, the data obtained through cookies should be evaluated within the scope of our Policy and KVK Law only if it constitutes personal data under Turkish law.

## **B. Types of Cookies**

### a) Cookies in terms of duration:

Session cookies refer to cookies that are deleted upon the user closing the browser.

Persistent cookies are cookies that remain on the user's computer/device for a predetermined period of time.

### b) Cookies by domain

Cookies placed by the visited domain are related party cookies.

The placement of cookies on the user device by persons other than the visited area, placed by a different visited area, is referred to as a third party cookie.

## **C. Purposes of Use of Cookies**

Tacirler Yatırım may use cookies for the following purposes on its websites, platforms, applications, advertisements, e-mails, messages and messages.

- a. **Operational uses:** As Tacirler Yatırım, we may use technologies that enable the use of the functions on the website, applications and platforms for the administration and security of the website, platform, applications and services, and cookies used to detect irregular behaviors in these channels.
- b. **Uses related to functionality:** Tacirler Yatırım may use cookies such as technologies that remind user information and preferences in order to facilitate the use of the website, platforms, applications and services for users and to customize them for each user.
- c. **Uses for performance purposes:** In order to measure and improve the performance of Tacirler Yatırım websites, applications, platforms and services, we may use cookies to

understand how users use Tacirler Yatırım websites, applications, platforms and services, and cookies that allow us to analyze user behavior and technologies that allow us to understand whether the messages we send are interacted with.

- d. **Uses for advertising:** We may use cookies that measure the effectiveness of advertisements and related party cookies and third party cookies that show whether a particular advertisement has been clicked or how many times the advertisement has been viewed, and cookies that measure the effectiveness of advertisements in order to transmit advertisements and similar content targeted to the interests of users through websites, platforms and applications belonging to Tacirler Yatırım or third parties.

#### **D. Right to Refuse and Delete Cookies**

Most browsers allow the use of cookies, and users can also reject or delete cookies by changing their browser settings at any time. Since the method of changing the settings may differ according to the browsers in use, the methods of changing the settings can be learned from the service provider of the browser used.

We would like to remind you that if cookies are disabled by users, it may be possible to not benefit from some features of the Tacirler Yatırım website, application, platform and services.

#### **E. Activities of Service Providers**

It may be possible to receive support from service providers that we have authorized for the execution and promotion of Tacirler Yatırım websites, platforms and applications and services. These service providers may also place cookies and similar technologies (third party cookies) on users' computer/device and collect information such as IP address, unique identifier and device identifier to identify the user device.

### **IV. WEBSITES, PRODUCTS OF THIRD PARTIES ON OUR WEBSITES AND SERVICES**

Tacirler Yatırım websites, platforms and applications may contain links to the websites of third parties and other organizations and the products and services on these websites. Due to the presence of these links on our websites, Tacirler Yatırım cannot be held responsible for the privacy practices of third parties.

Although they are included on Tacirler Yatırım's websites, links related to third parties or links belonging to third parties that do not belong to our organization are subject to the privacy policies of third parties, and we recommend that the privacy policies of these sites be examined in case of visiting the websites accessed through our websites.

#### **V. CHANGES TO BE MADE IN OUR PRIVACY POLICY**

Changes may be made in our Personal Data Protection and Privacy Policy when deemed necessary, and our current policy will be available on Tacirler Yatırım's website [www.tacirler.com.tr](http://www.tacirler.com.tr).

Amendments will become valid as of the date of uploading to the website of Tacirler Yatırım, and if deemed necessary, Tacirler Yatırım may also notify the amendments through the methods it deems appropriate.

*(Effective: With the Executive Decree No. 2480 dated November 01, 2019, it was put into effect on the date of decision)*

## ANNEX-1 DATA SUBJECT APPLICATION FORM

### Information on the Applicant

Name Surname : \_\_\_\_\_

T.R. Identity Number : \_\_\_\_\_

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

Cell Phone : \_\_\_\_\_

E-Mail Address : \_\_\_\_\_

### If you are a Tacirler Investment Client

Account Number : \_\_\_\_\_

### YOUR RIGHTS AS A DATA SUBJECT WITHIN THE SCOPE OF KVKK NUMBERED 6698

By sending this application form to Tacirler Yatırım Menkul Değerler A.Ş. to our e-mail address [kvkk@tacirler.com.tr](mailto:kvkk@tacirler.com.tr) regarding yourself;

- To learn whether your personal data is processed by Tacirler Yatırım,
- Requesting information if your personal data has been processed by Tacirler Yatırım,
- To learn the purpose of processing your personal data by Tacirler Yatırım and whether they are used in accordance with their purpose,
- To know the third parties to whom your personal data is transferred by Tacirler Yatırım domestically or abroad,
- In case your personal data has been processed incompletely or inaccurately by Tacirler Yatırım, to request their correction or renewal if they have changed,
- Deletion or destruction of your personal data if you think that the reasons requiring its processing have disappeared  
Don't ask,
- You have the right to request notification of the transactions made pursuant to subparagraphs (e) and (f) to third parties to whom your personal data are transferred.

### Applicant Request Detail

In accordance with the Law on the Protection of Personal Data, please indicate below your request within the scope of your rights listed above, your type of relationship with our organization (customer, former employee, business partner, etc.) and your

My request within the scope of KVKK:

**Please note that my application to your Company, which is the Data Controller, with this form is in accordance with the Law No. 6698 on the Protection of Personal Data 13. and I request that I be notified via the e-mail address I have provided in the Information on the Applicant section.**

Date : \_\_\_\_/\_\_\_\_/\_\_\_\_

Name Surname : \_\_\_\_\_

SIGNATURE



## ANNEX-2 EXPLICIT CONSENT DECLARATION REGARDING THE PROCESSING AND TRANSFER OF PERSONAL DATA IN FOREIGN MARKETS

This form has been prepared in accordance with Article 10 of the "Personal Data Protection Law" numbered 6698 (shortly "KVKK"). This declaration has been prepared in accordance with Article 10 of the Law No. 6698 on the Protection of Personal Data (hereinafter referred to as the "LPPD") and this declaration aims to inform you about the investment account to be opened directly in your name abroad in accordance with the Framework Agreement for Brokerage of Trading Transactions in Foreign Markets (hereinafter referred to as the "Agreement") and its annexes and the conditions and reasons under which the data collected in connection with the transactions you will make through this account may be shared with financial institutions and/or their affiliates abroad or with third party service providers and domestic and foreign legal authorities due to the services you will receive and to obtain your consent in this regard.

### Collected Data:

- I. **Personal Identity Information:** Your full legal name; address; date of birth; Tax Identification Number, Social Security or other government-issued identification number.
- II. **Financial Information:** Such as your bank account information, income and net worth.
- III. **Tax Information:** For purposes of determining appropriate withholdings and exemptions and tax filing status; in the case of non-U.S. citizen Clients, we need this information to complete your W-8BEN with the IRS.
- IV. **Transaction Information:** In accordance with applicable domestic and foreign laws, we keep official books and records of all transactions conducted on your account, including transactions, deposits and withdrawals
- V. **Other Information:** There may be circumstances where we may request additional information in order to provide our live market data service and other services in accordance with applicable laws relating to your account.

We also collect information about you from other third party sources for various purposes, including, but not limited to, the following:

- VI. **Authentication Services:** Tacirler Yatırım uses a third party service to help verify your identity in accordance with Turkish regulations and DriveWealth uses a third party service to help verify your identity in accordance with US regulations.
- VII. **Background information:** We may obtain background reports about you from publicly available records as part of our verification procedures.

### Purpose of Processing Personal Data

- I. Since your personal data are subject to capital and financial markets legislation and tax legislation in the countries where the relevant stock exchanges where your transactions are carried out are located, we are required to comply with the relevant legislation and / or directives of regulatory authorities / organizations. For example;

- II.** The Securities Act of 1933 and the Securities Exchange Act of 1933, which are federal laws that establish minimum standards for the trading of corporate stock and the exercise of management or shareholder rights in the United States

In order to fulfill the obligations arising from the Securities and Exchange Act of 1934 and the Sarbanes-Ozley Act of 2002 and the Dod-Frank Wall Street Reform and Consumer Protection Act of 2002, as amended, your shareholder communications regarding your rights arising from such securities in companies in which you hold shares and share-like securities and your information regarding the exercise of rights will be processed by our foreign partner DriveWealth LLC and its affiliates and third party service providers from which custody services are received.

- III.** Due to the fact that your transactions in foreign markets are under the supervision and surveillance of the regulatory authority / organization in the relevant country, information may be requested by the regulatory authority / organization in the relevant market or the stock exchange where the relevant transaction takes place and regular notifications may be required. Accordingly, your personal data will be processed by the regulatory body/organization or the exchange to which the relevant exchange is affiliated.
- IV.** Since your account with DriveWealth LLC is opened directly in your name, your personal data may be processed by DriveWealth LLC and its affiliates or custodian institutions/organizations in order to carry out settlement and custody transactions directly in your name.
- V.** Due to live data package requests through the trading platform, your personal data may be processed by DriveWealth LLC and its affiliates or the third party data provider from which the service is received in order to provide the package.
- VI.** In order to fulfill your cash and securities transfer requests, your personal data may be processed by the counterparties to which the request will be forwarded, as your personal data will need to be shared with the relevant counterparty financial institutions in Turkey and abroad.
- VII.** Within the scope of the Foreign Account Tax Compliance Act (shortly "FATCA"), tax withholding will be made at the source for income earned in the United States and this tax withholding will need to be reported to the U.S. Internal Revenue Service (shortly "U.S. IRS"). In addition, within the scope of the Common Reporting Standard (shortly "CRS"), this information may be shared with the Turkish Revenue Administration (shortly "RA") by the U.S. IRS. For this reason, your personal data may be shared with DriveWealth LLC and its affiliates,  
It will be processed by U.S. IRS and RA.

### **Collection of Personal Data**

As per your declaration, your personal data is collected through our headquarters and off-center

organizations, affiliated companies, all mobile applications, electronic transaction platforms, applications made through websites, social media, visits and interviews of our customer representatives, SMS channels, written/digital applications made to direct sales teams and other channels through which our company communicates or may communicate in the future due to business relations with its customers and is stored within the legal periods in accordance with the relevant legislation.

Your personal data, the processing of which is mandatory within the scope of the contracts established as mandatory for our organization to continue its activities and which is required by the obligations specified in the legal regulations or which is necessary to be processed for the legitimate interests of Tacirler Yatırım, is collected and processed by obtaining your explicit consent in the capacity of Data Controller, provided that it does not harm your fundamental rights and freedoms.

### **Sharing with Third Parties**

In order to comply with the regulations in legal regulations such as the Capital Markets Law, Banking Law, Commercial Code, Tax Procedure Law, MASAK legislation - regarding the determination of access information such as the identity and address of the customer and its storage within legal periods - and the information storage, reporting and information obligations stipulated by legal authorities such as TSPB, BIST, CMB, MASAK, BRSA, CBRT, Undersecretariat of Treasury; Personal data are recorded, stored, protected, classified, classified, updated and shared with third parties within legal limits by Tacirler Yatırım in the capacity of Data Controller and in the ways listed in the LPPD. persons who are legally required to transfer your personal data.

Your personal data at Tacirler Yatırım may be transferred to administrative and official authorities that are legally required to be transferred, direct and indirect shareholders and domestic affiliates of our Institution, our business partners, our suppliers, domestic third parties that provide support services or receive services from our company in cases permitted by the legislation, independent audit companies, organizations permitted to transfer information in accordance with the Capital Markets Law, electronic media, platforms and websites of our Institution used for Capital Markets activities, Capital Markets Board, Borsa Istanbul A.Ş., Turkish Capital Markets Association, Central Registry Agency, Capital Markets Board of Turkey, Borsa Istanbul A.Ş., Turkish Capital Markets Association, Central Registry Agency, Central Bank of the Republic of Turkey, Takasbank and Investor Compensation Center - due to legal obligations and within the framework of legal limitations - to official authorities and legal entities authorized by law to request customer information. It will also be shared with cooperating organizations, program partners, co-branding parties and third parties with whom they cooperate, domestic/foreign banks, financial institutions - in a limited manner and in a specific direction.

### **National and International Requirements**

DriveWealth will comply with both the GDPR (General Data Protection Regulation) and national data protection legislation. If applicable national legislation requires a higher level of protection for Personal Data than such policies/guidelines, such stricter requirements must be complied with. If DriveWealth's policies/guidelines are more stringent than local legislation, our policies/guidelines must be followed. Click here to access [DriveWealth Privacy Policy](#). DriveWealth does not sell

collected personal data to third parties. Click here to access [the DriveWealth Privacy Statement](#). If you have any questions regarding the content of DriveWealth's Privacy Policy or if you believe that DriveWealth has not protected your Personal Data in accordance with this Privacy Policy and would like to lodge a complaint, please contact DriveWealth's Data Protection officer at [privacy@drivewealth.com](mailto:privacy@drivewealth.com).

### **Your Rights Regarding Personal Data**

Pursuant to Article 11 of the KVKK, to ask whether your personal data has been processed, to request information if it has been processed, to learn the purpose of processing and whether it is used in accordance with its purpose, to learn the third parties to whom it has been transferred domestically or abroad, to request correction of personal data - if incomplete / incorrectly processed - to request notification of this correction to third parties to whom the information has been transferred, to request the deletion / destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK in case the reasons requiring the processing of personal data disappear, except for legal limits. You have the right to request the deletion / destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK, to request notification of your request for deletion / destruction to third parties to whom it is transferred, to object to the occurrence of a result against you due to the analysis exclusively by automated systems, and to request compensation for damages in case you suffer damage due to unlawful processing.

The Customer accepts, declares and undertakes that he/she consents to the sharing of his/her personal data with the above-mentioned institutions/organizations due to the investment account to be opened in foreign markets within the scope of the explanations made above and the transactions to be carried out in this account and within the framework of legal limitations.

This declaration has been concluded in accordance with the Framework Agreement for Intermediation in Trading Transactions in Foreign Markets and the Foreign Investment Institution Agreement and its annexes and consists of 4 (four) pages. 1 (one) original signed by the parties with digital and/or wet signature in accordance with Article 5 of the Document Registration Communiqué and deemed to be an integral whole with its annexes. The Client has received a copy of the Agreement electronically with Tacirler Yatırım's signature and stamped approval of conformity with the original.

### **CUSTOMER**

Name, Surname/Title :

TCKN :

Customer No :

Contract Date/Time :