

YAPI KREDİ TEKNOLOJİ A.Ş.

PROTECTION AND PROCESSING OF

PROCESSING CORPORATE

POLICY

1. YAPI KREDİ TEKNOLOJİ A.Ş. PERSONAL DATA PROTECTION AND PROCESSING CORPORATE POLICY INFORMATION FORM

Document Name:

Yapı Kredi TEKNOLOJİ A.Ş. Personal Data Protection and Processing Policy

Target Audience:

All natural persons whose personal data are processed by Yapı Kredi Teknoloji A.Ş., excluding Yapı Kredi Teknoloji A.Ş. employees

Prepared By:

Yapı Kredi Teknoloji A.Ş. PDPL Compliance Team

Version:

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Approved By:

Approved by the Senior Management of Yapı Kredi Teknoloji A.Ş.

Effective Date:

In the event of any discrepancy between the Turkish original of this Policy and any translated version thereof, the Turkish text shall prevail.

YAPI KREDİ TEKNOLOJİ A.Ş.,

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2. PURPOSE AND SCOPE

Law No. 6698 on the Protection of Personal Data (“Law”) entered into force on 7 April 2016. This Yapı Kredi Teknoloji A.Ş. Personal Data Processing and Protection Policy (“Policy”) has been prepared and put into effect for the purposes of ensuring Yapı Kredi Teknoloji Anonim Şirketi’s (“Company” or “Yapı Kredi Teknoloji”) compliance with the Law and establishing the principles to be observed in fulfilling obligations related to the protection and processing of personal data by Yapı Kredi Teknoloji Anonim Şirketi.

This Policy sets out the conditions for processing personal data and the core principles adopted by Yapı Kredi Teknoloji in the processing of personal data. In this context, the Policy contains general explanations covering all personal data processing activities carried out by the Company pursuant to the Law with respect to persons other than Yapı Kredi Teknoloji employees, and all data subjects whose personal data are processed by Yapı Kredi Teknoloji.

Process-specific privacy notices have been prepared separately for the processes in which data subjects’ personal data and special categories of personal data are processed. Matters relating to the processing of personal data of Yapı Kredi Teknoloji employees are separately regulated under the Yapı Kredi Teknoloji Anonim Şirketi Employee Personal Data Processing and Protection Policy.

3. ENTRY INTO FORCE AND AMENDMENTS

This Policy has been approved by Yapı Kredi Teknoloji and entered into force. **The general principles of Yapı ve Kredi Bankası A.Ş., and the Bank’s policies regarding the protection and processing of personal data and special categories of personal data have been taken as a basis. Updates will be monitored on an annual basis.**

The Company reserves the right to amend this Policy in line with applicable legislation. The current version of the Policy is accessible via the Yapı Kredi Teknoloji website at <https://www.ykteknoloji.com.tr>, as updated from time to time.

In the event of any conflict between the provisions of this Policy and applicable legislation, in particular the Law, the provisions of applicable legislation shall prevail.

4. APPLICATION OF THE POLICY AND RELEVANT LEGISLATION

The applicable statutory regulations concerning the processing and protection of personal data shall take precedence. In the event of any inconsistency between applicable legislation and this Policy, the Company acknowledges that applicable legislation shall govern. This Policy gives concrete effect to the rules established by the relevant legislation within the framework of the Company’s operations.

5. DEFINITIONS

Unless the context otherwise requires, in this Policy:

“Explicit Consent” means consent that is specific to a particular matter, based on information, and expressed freely,

“Constitution” The Constitution of the Republic of Turkey,

“Company” Yapı Kredi Teknoloji A.Ş.

“Bank” Means Yapı ve Kredi Bankası A.Ş.;

“Law” Law No. 6698 on the Protection of Personal Data

“Personal Data” Any information relating to an identified or identifiable natural person (e.g. name-surname, Turkish ID number, e-mail address, postal address, date of birth), accordingly, the processing of information relating to legal entities falls outside the scope of the Law),

“Data Subject” The natural person whose personal data are processed,

“Processing of Personal Data” Any operation performed on personal data, such as collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, receipt, making available, classification or prevention of use, whether wholly or partly by automated means, or by non-automated means forming part of a data filing system,

“Special Categories of Personal Data” Data relating to race, ethnic origin, political opinion, philosophical beliefs, religion, sect or other beliefs, clothing and appearance, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data

“Data Controller” The natural or legal person who determines the purposes and means of processing personal data and manages the place where data are kept in a systematic manner (data filing system)

6. PRINCIPLES AND CONDITIONS GOVERNING THE PROCESSING OF PERSONAL DATA

6.1. Principles Governing the Processing of Personal Data

Yapı Kredi Teknoloji processes personal data in accordance with the data processing principles set out in Article 4 of the Law. Compliance with these principles is mandatory for each and every personal data processing activity:

- **Processing of personal data in accordance with the law and the principle of good faith;**

Yapı Kredi Teknoloji acts in compliance with applicable legislation, secondary regulations and general principles of law in the processing of personal data and attaches importance to processing personal data in a manner limited to the stated purpose and to taking into account the reasonable expectations of the data subject.

- **Ensuring that personal data are accurate and up to date;**

Yapı Kredi Teknoloji pays careful attention to whether the personal data it processes are up to date and to carrying out controls in this regard. Data subjects are granted the right to request the correction or erasure of their inaccurate or outdated data.

- **Processing of personal data for specified, explicit and legitimate purposes;**

Yapı Kredi Teknoloji determines the purposes of data processing in a lawful manner prior to each personal data processing activity.

- **Ensuring that personal data processing is relevant to, limited to and proportionate with the purposes for which data are processed;**

Yapı Kredi Teknoloji limits its data processing activities to the personal data necessary to fulfill the purpose of collection and takes the necessary steps to ensure that personal data not related to that purpose is not processed.

- **Retaining personal data for the period required by legislation or the purposes of processing;** Yapı Kredi Teknoloji taking into account sector practices in relation to the retention of personal data, where no longer retention period is prescribed by law, personal data are erased, destroyed or anonymized by the Company upon the cessation of the purpose of processing or upon the expiry of the period prescribed by legislation.

6.2. Conditions for the Processing of Personal Data

Your personal data is processed by the Company where at least one of the personal data processing conditions set out in Article 5 of the Law is present. Explanations regarding those conditions are set out below:

- **Existence of the data subject's explicit consent** where no other data processing condition exists, in accordance with the general principles set out under heading 2.1, Yapı Kredi

Teknoloji may process the personal data of the data subject where the data subject has provided their free and informed consent, without any ambiguity and limited solely to that particular processing activity. with sufficient knowledge of the data processing activity in question, in an unequivocal manner and limited solely to that specific transaction.

- **Personal data processing being expressly provided for by law** Yapı Kredi Teknoloji may process personal data without the explicit consent of the data subject. In such cases, the Company shall process personal data in accordance with the relevant statutory provision.

- **Where it is not possible to obtain the explicit consent of the data subject due to factual impossibility and processing of personal data is mandatory**, Yapı Kredi Teknoloji will process the personal data of a data subject who is unable to express their consent or whose consent cannot be accorded legal validity, where processing is mandatory in order to protect the life or physical integrity of the data subject or a third party.

- **Where the personal data processing activity is directly related to the establishment or performance of a contract**, where the processing of personal data belonging to the parties of a written or oral contract concluded between the data subject and Yapı Kredi Teknoloji A.Ş. is necessary, the personal data processing activity will be carried out.

- **For the data controller to fulfill its legal obligation** where carrying out personal data processing activities is mandatory, Yapı Kredi Teknoloji will process personal data for the purpose of fulfilling its legal obligations set forth under applicable legislation.

- **Personal data having been made public by the data subject**, personal data that has been disclosed to the public in any manner by the data subject and made available to everyone as a result of such disclosure may be processed by Yapı Kredi Teknoloji without the explicit consent of the data subject, provided that such processing is limited to the purpose of disclosure.

- **Personal data processing being mandatory for the establishment, exercise or protection of a right** Yapı Kredi Teknoloji may, where mandatory, process the data subject's personal data without the data subject's explicit consent.

- **Where data processing is mandatory for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not prejudiced**, personal data may be processed by Yapı Kredi Teknoloji subject to balancing the interests of Yapı Kredi Teknoloji and the data subject. In this context, when processing data on the basis of legitimate interests, the Company first identifies the legitimate interest it will derive from the processing activity, assesses the potential impact of the processing on the rights and freedoms of the data subject, and proceeds with the processing activity only if it concludes that the balance is not disturbed.

6.3. Conditions for the Processing of Special Categories of Personal Data

The technical and administrative measures taken by our Company for the protection of personal data are implemented with respect to special categories of personal data within the scope described in the Special Categories of Personal Data Processing and Security Policy, in accordance with the adequate safeguards prescribed by the Personal Data Protection Board's Decision dated 31/01/2018 and numbered 2018/10, and the work carried out in this regard is monitored and supervised within the framework of audits conducted within our Company.

Article 6 of Law No. 6698 on the Protection of Personal Data, which governs the processing of special categories of personal data, was amended as published in the Official Gazette dated 12.03.2024 and numbered 32487; by virtue of this amendment, new data processing conditions were added to the existing conditions for processing special categories of personal data.

Yapı Kredi Teknoloji processes special categories of personal data in compliance with the applicable legal regulations and Personal Data Protection Board's ("Board"), in the following circumstances:

- a) The existence of the data subject's explicit consent,**
- b) Being expressly provided for by law,**
- c) Being mandatory for the protection of the life or physical integrity of the person who is unable to express their consent due to factual impossibility or whose consent is not legally valid, or of third person,**
- d) Relating to personal data manifestly made public by the data subject and being in accordance with the intent of such disclosure,**
- e) Being mandatory for the establishment, exercise or protection of a right,**
- f) Being necessary for the purposes of protecting public health, preventive medicine, medical diagnosis, the provision of treatment and care services, and the planning, management and financing of health services, carried out by persons bound by an obligation of confidentiality or by competent institutions and organizations,**
- g) Being mandatory for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,**
- h) Being carried out by foundations, associations and other non-profit organisations or entities established for political, philosophical, religious or trade union purposes, in respect of their current or former members and affiliates or persons who are in regular contact with such organizations, provided that such processing is in accordance with the legislation to which they are subject and their stated purposes, limited to their areas of activity, and not disclosed to third parties,**
- i) Personal data being necessary for the prevention of crime or for criminal investigations.**

7. CATEGORISATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND PURPOSES OF PROCESSING

Within our Company, personal data are processed in accordance with the general principles set out in the Law, in particular the principles specified in Article 4 of the Law governing the processing of personal data, on the basis of and limited to at least one of the Data Processing Conditions, in line with the personal data processing purposes arising in the context of the conduct of our Company's business activities.

Detailed information on those personal data processing purposes is set out in Annex 1 to the Policy ("Annex 1 – Personal Data Processing Purposes").

7.1. Categorization of Personal Data

Personal data are processed by category, having notified data subjects pursuant to Article 10 of the Law, for our Company's legitimate and lawful personal data processing purposes, on the basis of and limited to one or more of the personal data processing conditions set out in Articles 5 and 6 of the Law, in compliance with all principles and obligations regulated under the Law, in particular the general principles governing the processing of personal data. Information on the personal data subject categorizations within the scope of this Policy is available in Annex 2 to the Policy ("Annex 2 – Personal Data Categories").

8. NOTIFICATION AND RIGHTS OF THE DATA SUBJECT

8.1. Rights of the Data Subject

Data subjects have the following rights:

- (I.) To learn whether their personal data are being processed,
- (II.) To request information if their personal data have been processed,
- (III.) To learn the purpose of processing their personal data and whether such data are being used in accordance with that purpose,
- (IV.) To know the third parties to whom their personal data have been transferred, whether domestically or abroad,
- (V.) To request the rectification of their personal data if processed incompletely or inaccurately, and to request that the transaction carried out in this regard be notified to the third parties to whom the personal data have been transferred,
- (VI.) To request the erasure or destruction of their personal data in the event that the reasons necessitating its processing cease to exist, notwithstanding that it has been processed in accordance with the Law and other applicable statutory provisions, and to request that the transaction carried out in this regard be notified to the third parties to whom the personal data have been transferred,

(VII.) To object to a result arising to their detriment from the analysis of processed data exclusively through automated systems,

(VIII.) To claim compensation for any damage suffered as a result of unlawful processing of their personal data.

8.2. Notification of the Data Subject

Pursuant to Article 10 of the Law, data subjects must be notified prior to or, at the latest, at the time of the processing of their personal data. In accordance with that article, the necessary internal structure has been established by Yapı Kredi Teknoloji, acting as the data controller, to ensure that data subjects are notified in every instance in which a personal data processing activity is conducted. You may at any time submit your requests regarding your personal data within the scope of **Article 11 of the Law on the Protection of Personal Data** your requests within the scope of, **in accordance with the “Communiqué on Procedures and Principles for Application to the Data Controller”** in writing or via registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the e-mail address previously notified to and registered in our system with Yapı Kredi Teknoloji A.Ş., to the addresses set out below.

Data Controller: Yapı Kredi Teknoloji A.Ş.

E-posta: YKTKVKKUyum@ykteknoloji.com.tr

Kep Adresi: ykteknoloji@hs02.kep.tr

Adres: Reşitpaşa Mah. Katar Cad. Teknokent Arı 3 Sit. No.4/B201 Sarıyer ISTANBUL

When submitting your applications regarding your rights under the Law, you may use the <https://www.ykteknoloji.com.tr> website to access the Data Subject Application Form. Depending on the nature of your request, your applications will be processed free of charge as soon as possible and within a maximum of thirty days. If the process also incurs a cost, a fee may be charged from you according to the tariff determined by the **Personal Data Protection Board**. When evaluating applications, Yapı Kredi Teknoloji first verifies whether the applicant is the genuine rights holder. Furthermore, the Company may, where it deems necessary, request additional detailed information to better understand the request. Responses to data subject applications are communicated to data subjects in writing or electronically by the Company. In the event that an application is rejected, the reasons for the rejection will be explained to the data subject with justification. Where personal data is not obtained directly from the data subject;

the Company shall carry out notification activities:

(1) within a reasonable period following the collection of personal data,

(2) where personal data are to be used for communication with the data subject, at the time of first contact,

(3) where personal data are to be transferred, at the latest at the time of the first transfer of personal data.

9. ENSURING THE SECURITY OF PERSONAL DATA

Our Company exercises the highest degree of care and due diligence in safeguarding personal data and, in accordance therewith, implements all requisite technical and administrative measures with respect to the matters set forth herein, for the purpose of ensuring the “data security” pursuant to Article 12 of the Law.

I. Company:

- To prevent unlawful processing of personal data,
- To prevent unlawful access to personal data,
- Takes all necessary technical and administrative measures to ensure an appropriate level of security for the preservation of personal data.

II. The Company shall be jointly and severally liable, together with any other natural or legal person processing personal data on its behalf, for compliance with the obligations specified in Section I above.

III. The Company shall ensure that its Internal Audit and Internal Control units conduct periodic audits to verify compliance with the requirements set forth in the Law.

IV. The Company shall ensure that all employees receive comprehensive training and instruction regarding personal data protection legislation and the lawful processing of personal data.

V. Employees of the Company and all persons who obtain access to personal data in the course of their employment or duties shall be prohibited from disclosing such data to third parties or utilizing it for purposes other than those specified in the processing operation, in contravention of the Law and all other applicable legislation. Such obligation shall remain in effect notwithstanding the termination of employment or cessation of duties.

VI. The Company shall include in all contracts concluded with third parties to whom personal data are lawfully transferred, provisions requiring such recipients to implement appropriate security measures for the protection of personal data and to ensure ongoing compliance with such measures within their respective organizations.

VII. Our Company takes the necessary technical and administrative measures, in accordance with technological capabilities and implementation costs, to ensure that personal data are stored in secure environments and to prevent their unlawful destruction, loss or alteration.

VIII. In the event that processed personal data are obtained by others through unlawful means, the relevant party and the PDPB are notified of the matter as soon as

possible. Furthermore, where deemed necessary by the PDPB, such situation is announced on the PDPB's website or by other means.

10. TRANSFER OF PERSONAL DATA

Our Company may transfer personal data and special categories of personal data relating to data subjects to third parties (third-party companies, group companies, third-party natural persons) where such transfers are carried out for its lawful personal data processing purposes and subject to the implementation of all necessary and appropriate technical and administrative security measures. Our Company acts in full compliance with the provisions stipulated under in Article 8 of the Law. Further detailed information concerning data transfers is provided in section 9.3 of this Policy.

10.1. Transfer of Personal Data to Third Parties Resident in the Domestic Jurisdiction

Notwithstanding the absence of the data subject's explicit consent, the Company may transfer personal data to third parties, provided that such transfers are carried out with due care and in strict compliance with all requisite technical and administrative security measures, including those prescribed by the Board, where one or more of the data processing conditions enumerated below ("Data Processing Conditions") are satisfied.

- The relevant activities relating to the transfer of personal data are expressly provided for by law,
- The transfer of personal data by the Company is directly related to and necessary for the establishment or performance of a contract,
- The transfer of personal data is mandatory for our Company to fulfill its legal obligation,
- The transfer of personal data by our Company, in a manner limited to the purpose of disclosure, provided that the personal data has been made public by the data subject,
- The transfer of personal data by the Company is mandatory for the establishment, exercise, or protection of the rights of the Company, the data subject, or third parties.
- Being mandatory for the protection of the life or physical integrity of the person who is unable to express their consent due to factual impossibility or whose consent is not legally valid, or of another person.

10.2. Transfer of Personal Data to Third Parties Resident Abroad

- (i) Yapı Kredi Technology, in accordance with the provisions listed in Articles 9 of the Law, the decision of the Personal Data Protection Board dated 04.06.2024 and numbered 2024/959, the Regulation on Procedures and Principles Regarding the Transfer of Personal Data Abroad, and additional regulations determined by the Board; when necessary during the data processing process and when the conditions for transferring personal data are met, personal data

will be transferred in the manner explained below, by taking technical and administrative measures in line with the principles specified in Article 9 of the Law and this Policy.

(ii) Transfer Based on Adequacy Decision: Personal data may be transferred abroad where one of the data processing conditions set out in Articles 5 and 6 of the Law exists and where the Board has issued an adequacy decision in respect of the country to which the transfer is to be made, the sectors within that country, or international organizations. The new regulation has made it possible for an adequacy decision to be issued not only for an entire country but also for a specific sector within that country or for international organizations. The Board shall review adequacy decisions every four years and, if no review is carried out within this period, the existing adequacy decision shall remain in force.

(iii) Transfer Based on Appropriate Safeguards: In the absence of an adequacy decision, personal data may be transferred abroad where one of the conditions set out in Articles 5 and 6 of the Law exists, provided that the data subject also has the possibility to exercise their rights and seek effective legal remedies in the country to which the transfer is to be made, and where one of the following appropriate safeguards is provided:

- **Agreements not constituting international treaties:** Existence of an agreement between foreign public institutions and organizations or international organizations and public institutions and organizations or professional organizations of a public institution nature in Turkey, and the Board's permission for the transfer.

- **Binding Corporate Rules:** The existence of binding corporate rules that companies within an enterprise group engaged in joint economic activities are obliged to comply with, that ensure the protection of personal data, and that have been pre-approved by the Board. In such a case, data may be transferred between group companies without obtaining additional authorization from the Board.

- **Standard Contractual Clauses:** The signing by the parties of standard contractual clauses announced by the Board, covering matters such as data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, and additional measures taken for special categories of personal data. The signed standard contractual clauses must be notified to the Authority within five business days.

- **Written Undertaking:** The submission for the Board's approval of a written undertaking containing provisions that will ensure adequate protection, and the Board's authorization of the transfer.

(iv) Incidental Transfers: In the absence of an adequacy decision and where none of the appropriate safeguards can be provided, personal data may be transferred abroad if the transfer is incidental and one of the following exceptional circumstances exists. Incidental transfer refers to transfer activities that are irregular, non-continuous and rarely occurring. These exceptional circumstances must be interpreted narrowly:

- The data subject giving their explicit consent to the transfer, provided that they have been informed of the possible risks;
- The transfer being mandatory for the performance of a contract between the data subject and the data controller or for the application of pre-contractual measures taken at the request of the data subject;
- The transfer being mandatory for the conclusion or performance of a contract to be concluded between the data controller and another natural or legal person in the interest of the data subject;
- The transfer being mandatory for an overriding public interest;
- The transfer of personal data being mandatory for the establishment, exercise or protection of a right;
- The transfer of personal data being mandatory for the protection of the life or physical integrity of a person who is unable to express their consent due to actual impossibility or whose consent is not legally valid, or of another person;
- Transfer being made from a register that is open to the public or to persons with a legitimate interest, provided that the conditions required by the applicable legislation for access to the register are met and that the person with a legitimate interest requests the transfer.

Within the scope of the general principles of the Law and the data processing conditions specified in Articles 8 and 9 of the Law, and pursuant to paragraph (a) of the fourth clause of Article 9 of the Law; Yapı Kredi Technology can transfer data to relevant parties during the data processing process, provided that there is an 'agreement that is not a treaty' serving as the basis for the transfer of personal data abroad between the Ministry of Interior's Directorate General of Migration Management and the United Nations High Commissioner for Refugees, and the existence of Article 11 of the Regulation on Procedures and Principles Regarding the Transfer of Personal Data Abroad. The parties to whom personal data are transferred and the purposes of transfer are explained in the process-specific privacy notices.

10.3. Third Parties to Whom Personal Data Is Transferred

Your personal data may be transferred to the following categories of parties:

- I. Legally Authorized Institutions,

- II. Legally Authorized Private Law Persons
- III. Our Business / Solution Partners,
- IV. Our Suppliers,
- V. Our Shareholders,
- VI. Our Affiliates,
- VII. Company Board of Directors Members

The scope of the above-mentioned parties to whom transfers are made and the purposes of data transfer are set out below:

I. Legally Authorized Public Institutions

Means public/private institutions and organizations authorized to receive information and documents from the Company pursuant to the applicable legislation. These include the Central Bank of Turkey (TCMB), the Financial Crimes Investigation Board (MASAK), the Banks Association of Turkey (TBB), the Small and Medium Enterprises Development Organization (KOSGEB), the Revenue Administration (GIB), the Treasury Undersecretariat, the Social Security Institution (SGK), Tax Offices, courts and similar legally authorised public/private institutions and organizations. Transfers are made only to the extent of the purpose requested within the legal authority of the relevant public/private institutions and organizations.

II. Legally Authorized Private Law Persons

Means institutions or organizations established in accordance with legally determined conditions pursuant to the applicable statutory provisions and continuing their activities within the framework determined by law (e.g., independent auditors, notaries). Personal data are shared on a limited basis in relation to matters falling within the scope of activities carried out by such private institutions and organizations.

III. Our Business / Solution Partners,

Means parties established domestically and/or abroad with which the Company has entered into cooperation, business partnership, program partnership, co-branding or agency relationships for purposes such as the sale, promotion and marketing of the Company's products and services and the operation of programs in the course of conducting the Company's financial activities. Personal data is shared on a limited basis in relation to matters relevant to fulfilling the establishment purposes of the relevant business and solution partnership.

IV. Supplier

Means parties and support service organizations that supply goods and/or services to the Company on a contractual basis in accordance with the Company's orders and instructions in the conduct of the Company's commercial activities. Transfers are made on a limited basis for

the purpose of procuring, through outsourcing, the goods and/or services necessary for the Company to carry out its commercial activities and for the purpose of receiving support services.

V. Shareholders

Means the controlling shareholder, Yapı ve Kredi Bankası Anonim Şirketi, established domestically and/or abroad, which manages and oversees the Company's commercial activities and strategies pursuant to the applicable statutory provisions. Transfers are made on a limited basis for the purposes of designing strategies related to the Company's commercial activities and conducting audits pursuant to the applicable statutory provisions.

VI. Subsidiaries/Affiliates

Means companies, including both direct and indirect affiliates of the Company, established domestically and/or abroad. Transfers are made on a limited basis for the purpose of ensuring the conduct of commercial activities requiring such participation.

VII. Company Board of Directors Members

Refers to the Members of the Company Board of Directors, only for the purpose of conducting the Company Board of Directors' activities.

a. Transfer of Special Categories of Personal Data to Third Parties Resident in Turkey

Special categories of personal data may be transferred domestically. However, as the Company, special categories of personal data are processed in compliance with the principles set out in this Policy and where the following conditions are present:

(i) Existence of the Data Subject's Explicit Consent

The primary basis for processing special categories of personal data is the explicit consent of the data subject. Special categories of personal data may not be processed without the data subject's explicit consent.

Explicit consent is consent that is specific to a particular matter, based on information, and freely given. Where the data subject's explicit consent exists, special categories of personal data may be processed.

(ii) Being Expressly Provided for by Law

Where the data subject's special categories of personal data are expressly provided for by law, i.e., where the relevant legislation contains an explicit provision regarding the processing of special categories of personal data, this data processing condition shall be deemed to exist.

(iii) Inability to Obtain the Explicit Consent of the Data Subject Due to Actual Impossibility

Where the processing of special categories of personal data is mandatory for the protection of the life or physical integrity of the person who is unable to express their consent due to factual impossibility or whose consent cannot be accorded legal validity, or of another person, the data subject's personal data may be processed.

10.4. Transfer of Special Categories of Personal Data to Third Parties Resident Abroad

The transfer of special categories of personal data abroad by our Company shall be carried out in accordance with Article 9 of the Law and the principles set out in this Policy, with technical and administrative measures in place, as described below:

(i) Transfer Based on an Adequacy Decision Regarding the Relevant Country, International Organization or Sectors within the Country

Personal data may be transferred abroad where one of the conditions specified in Articles 5 and 6 of the Law is present, and the Board has issued an adequacy decision regarding the country, international organization, or sectors within the country to which the transfer is to be made.

The adequacy decision is issued by the Board and published in the Official Gazette. When issuing an adequacy decision, the Board assesses the suitability of the country, international organization, or sector from the perspective of the protection of personal data. The adequacy decision is issued upon determination that the country, international organization, or sector provides adequate protection for personal data. In the event that an adequacy decision is withdrawn or suspended, the transfer of personal data is halted or suspended.

(ii) Transfer Based on Appropriate Safeguards

In the absence of an adequacy decision, personal data may be transferred abroad by the Company where one of the personal data processing conditions specified in Articles 5 and 6 of the Law is present, the data subject has the ability to exercise their rights and seek effective remedies in the country to which the transfer is to be made, and one of the appropriate safeguards specified below is provided by the parties:

- **Special Transfer Ground for Public Institutions and Organizations or Professional Bodies of a Public Institution Character:** Existence of an agreement that is not in the nature of an international treaty between foreign public institutions and organizations or international organizations and public institutions and organizations or professional organizations of public institution nature in Turkey, and the Board's permission for the transfer.
- **Binding Corporate Rules:** The existence of common rules on the protection of personal data that companies within an enterprise group engaged in joint economic activities are obliged to comply with, and the existence of binding corporate rules approved by the Board.

- **Standard Contractual Clauses:** Informing the parties of the country to which the transfer is to be made, the data subject, the data categories, the purpose of data transfer and the legal process regarding the standard contractual clauses, as also required by the Board.

- **Written Undertaking:** The existence of a written undertaking containing provisions that will ensure adequate protection, and the Board's authorization of the transfer.

(iii) Transfer Based on Exceptional Circumstances

In the absence of an adequacy decision and where none of the appropriate safeguards can be provided, personal data may be transferred abroad by the Company where the transfer is incidental and one of the following circumstances exists:

- **Informed Explicit Consent Regarding Possible Risks:** The data subject giving their explicit consent to the transfer, provided that they have been informed of the possible risks.

- **Performance of Contract and Application of Pre-Contractual Measures:** The transfer being mandatory for the performance of a contract between the data subject and the data controller or for the application of pre-contractual measures taken at the request of the data subject.

- **Third-Party Contract for the Benefit of the Data Subject:** The transfer being mandatory for the conclusion or performance of a contract concluded between the data controller and a third party for the benefit of the data subject.

- **Overriding Public Interest:** The transfer is mandatory due to an overriding public interest.

- **Legal Claims, Exercise and Protection:** The transfer of personal data is mandatory for establishing, exercising, or protecting a right.

- **Protection of the Data Subject's Vital Interests:** The transfer of personal data being mandatory for the protection of the life or physical integrity of the data subject or of another person, where it is not possible for the data subject to give their explicit consent.

- **Transfer of Publicly Available Data:** Making the transfer of publicly available personal data mandatory.

11. ERASURE, DESTRUCTION AND ANONYMISATION OF PERSONAL DATA

Pursuant to Article 7 of the Law, notwithstanding that personal data have been processed lawfully, where the reasons necessitating their processing cease to exist and in the absence of a longer retention period prescribed by law, taking into account sector practices, personal data shall be erased, destroyed or anonymised by Yapı Kredi Teknoloji, either ex officio or upon the request of the data subject, in accordance with the guidelines published by the Personal Data Protection Authority, periodic destruction periods and data subject applications. Personal data being processed by the Company are addressed on a categorical basis, and maximum data retention periods have been determined for each personal data category.

Detailed information on how the retention and destruction process will be conducted is set out in the **Personal Data Retention and Destruction Policy** prepared by the Company.

12. COOKIE MANAGEMENT

As Yapı Kredi Technology Inc. (“Company”), we utilize certain technologies such as cookies, pixels, and gifs (“cookies”) to enhance the experience during visits to our online platforms. The use of these technologies and the processing of personal data are carried out in accordance with the applicable legislation, primarily Law No. 6698 on the Protection of Personal Data (“Law”).

Detailed information on cookies: <https://www.ykteknoloji.com.tr> is available in the Yapı Kredi Teknoloji Anonim Şirketi Cookie Policy at that address.

13. ANNEXES

ANNEX 1 – Purposes of Personal Data Processing

PRIMARY PURPOSES (MAIN)	SUB-PURPOSES (SECONDARY)
Planning and Execution of the Company's Human Resources Policies and Processes	Planning of Human Resources Processes
	Planning and Execution of Talent and Career Development Activities
	Planning and Execution of Fringe Benefits and Perks for Employees
	Planning and/or Execution of Intern and/or Student Procurement, Placement and Operational Processes
	Conducting Personnel Procurement Processes
	Fulfilment of Obligations Arising from Employment Contracts and/or Legislation for Company Employees
	Planning and Execution of Employee Satisfaction and/or Engagement Processes
	Planning and/or Execution of In-House Training Activities
Ensuring the Legal, Technical and Commercial-Business Security of the Company and Data Subjects in a Business Relationship with the Company	Planning and Execution of Company Audit Activities
	Providing Statutory Information to Authorised Organizations
	Ensuring the Security of Company Operations
	Planning and/or Execution of Occupational Health and/or Safety Processes
	Carrying out Corporate and Partnership Law Transactions
	Ensuring the Security of Company Fixed Assets and/or Resources
	Ensuring the Security of Company Premises and/or Facilities
	Planning and Execution of Operational Activities Necessary to Ensure the Conduct of Company Activities in Compliance with Company Procedures and/or Applicable Legislation
	Planning and Execution of Emergency Management Processes
Monitoring of Legal Matters	
Conducting the Necessary Work by Our Relevant Business Units for the Execution of Commercial Activities	Planning, Auditing and Execution of Information Security Processes
	Planning and/or Execution of Business Continuity Activities

Carried Out by the Company and Managing the Related Business Processes	Planning and Execution of Logistics Activities
	Planning and/or Execution of Activities for Conducting Effectiveness/Efficiency and/or Appropriateness Analyses of Business Activities
	Planning and Execution of Business Activities
	Planning and Execution of Corporate Communication Activities
	Monitoring of Finance and/or Accounting Matters
Conducting the Necessary Work by Our Business Units to Enable Data Subjects to Benefit from the Products and Services Offered by the Company, and Managing the Related Business Processes	Monitoring of Contract Processes and/or Legal Requests
	Planning and Execution of Sales Processes for Products and/or Services
	Planning and/or Execution of After-Sales Support Service Activities
	Monitoring of Customer Requests and/or Complaints
Planning and Execution of the Company's Commercial and/or Business Strategies	Planning and Execution of External Training Activities
	Management of Relationships with Business Partners and/or Suppliers
Customisation and Recommendation of Products and Services Offered by the Company to Data Subjects in Accordance with Their Preferences, Usage Habits and Needs	Planning and/or Execution of Customer Satisfaction Activities

ANNEX 2 – Data Subjects

DATA SUBJECT CATEGORIES	DESCRIPTION
Customer	Natural persons who use or have used the services offered by our Company, regardless of whether they have any contractual relationship with our Company
Visitor	Natural persons who have entered the physical premises owned by our Company for various purposes or who visit our websites
Third Party	Third-party natural persons related to the aforementioned parties for the purpose of ensuring the security of commercial transactions between our Company and such parties, or to protect the rights and interests of such persons (e.g. family members and relatives), or other natural persons not falling within the scope of this Policy and the Yapı Kredi Teknoloji Anonim Şirketi Employees Personal Data Protection and Processing Policy
Job Applicant	Natural persons who have applied for a position with our Company in any manner or who have made their CV and relevant information available for review by our Company (including intern applicants)
Company Shareholder	Natural persons who are shareholders of our Company
Company Representative	Board of directors members and other authorised natural persons of our Company

Employees, Shareholders and Representatives of Institutions with Which We Collaborate	Natural persons, including shareholders and officials of such institutions, employed at institutions with which our Company has any kind of business relationship (including but not limited to business partners and suppliers)
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