

We, as Credit Suisse İstanbul Menkul Değerler A.Ş. ("Company", "CSIMD"), care about your safety. We protect the fundamental rights and freedoms of individuals, especially the privacy of personal life in the processing of personal data in accordance with Law No. 6698 on Personal Data Protection Law ("KVKK"). We also take the necessary technical and administrative measures to ensure that personal data is kept in accordance with the law and prevent the unlawful processing of personal and unlawful access to personal data.

"You" and "your" as used in this statement refers to individuals:

- with whom we come into contact, or in respect of whom we obtain personal data, in the usual course of dealings with our current, prospective and former clients, our service providers, and our other business counterparties or transaction participants or third parties, which may include, without limitation, employees, directors, officers, agents, representatives, visitors, beneficial owners and other personnel of such clients, service providers, business counterparties or transaction participants (each a "**Connected Individual**"), in all cases outside the UBS group<sup>1</sup> (as applicable to you, "Your Organisation"); or
- who themselves are our clients.

Accordingly, this Personal Data Privacy Statement has been drawn up to inform you of the processing, retention and transfer of your personal data in accordance with the KVKK.

#### **a) Data Controller**

"We", "us" and "our" in this declaration refers to CSIMD, which is responsible for data processing in section b) of this statement. In certain cases, multiple UBS group entities may be responsible for processing data at the same time, independently of each other and/or in different jurisdictions (e.g. when you sign a contract with multiple UBS group entities), and you may have been given other privacy statements by other UBS group entities.

#### **b) Data collection and purposes of processing personal data**

##### **Sources and data that we use**

###### **Data collected from you:**

We process personal data about you that we obtain from you in the context of our current, possible or former business relationship with you and/or Your Organisation (as applicable). We do this in order to facilitate, enable and/or maintain that relationship and/or to provide services to our clients or for other reasons specified below. In addition, in carrying on our business relationship with you or Your Organisation, information may be collected about you indirectly from monitoring or other means (e.g., recording of telephone calls and monitoring e-mails) in line with legal and regulatory obligations. In these circumstances, the information is not accessed on a continuous or routine basis, but it may be used for compliance purposes.

###### **Data collected from other sources:**

We also process personal data about you that we obtain from publicly accessible sources (e.g., Trade Registry, press including trade press or paid for content, publicly available websites and other publicly available sources of information such as sanctions lists or lists of directors' disqualifications). Additionally, we process personal data that is legitimately transferred to us by other companies in the UBS group<sup>2</sup> or from other third parties. These may include Your Organisation as well as third parties not related to you or Your Organisation, such as a credit ratings agency, settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities, databases, and third party service providers such as professional advisers, insurers and risk consulting firms.

###### **Personal data relating to a third party:**

If you provide us with personal data about a third party, such as your spouse, children, parents, or a Connected Individual, you acknowledge and warrant that you have obtained this third party's consent (when required) before providing us with such personal data. You must ensure that you have informed such third parties and your Connected Individuals of our name, contact information and the scope and purpose of our collecting and processing of their personal data and how they will be processed, as described in this Privacy Statement.

<sup>1</sup> As a result of the acquisition of Credit Suisse Group by UBS Group, all entities of Credit Suisse Group have become UBS Group entities. Accordingly, the references to "Credit Suisse Group" (and similar references, e.g. "Credit Suisse entities", "affiliates", etc.) also include the UBS Group entities.

<sup>2</sup> This includes all entities of UBS Group in Switzerland and abroad.

**Types of personal data:**

The following categories of your personal data and personal data of special nature, can be collected by our company: identity information, contact information, financial information, employment information, request/complaint management information, visual and audio information, legal transaction information, location information, professional experience information, physical location safety information, information on criminal conviction and security measures, and vehicle information.

**Purpose and legal basis of processing**

In accordance with the terms stipulated in articles 5 and 6 of the KVKK and all applicable legislation, CSIMD may process personal data for the following purposes:

- Fulfilling our legal and administrative obligations and ensuring that our activities are carried out in accordance with the legislation,
- Fulfilling obligatory matters for the establishment and performance of contracts,
- Storing and reporting the information required by public institutions towards which we have an obligation to provide information, such as the Banking Regulation and Supervision Agency of Turkey ("BRSA"), Capital Markets Board of Turkey ("CMB"), Borsa Istanbul ("BIST"), Central Registry Agency (MKK), Financial Crimes Investigation Board ("MASAK"), Istanbul Settlement and Custody Bank ("Takasbank"), the Union of Capital Markets of Turkey ("TSPB"), the Capital Markets Licensing Registry and Training Agency ("SPL"), the Turkish Employment Agency ("ISKUR"), and informing said institutions,
- Receiving outsourced services for operational activities,
- Ensuring that the necessary activities are carried out by the relevant units in order to conduct the commercial activities specified in the Company's articles of association in accordance with the legislation and Company policies,
- Conducting the customer relationship management process within the framework of the contract and service standards, working for customer satisfaction and providing support to the visitors in the office building,
- Protecting employees, office buildings and assets, ensuring a safe environment and detecting and preventing anti-social and criminal behavior within this context,
- Ensuring the legal, technical and physical security of the employees and those who have a business relationship with the Company, and running the emergency management processes,
- Contacting natural persons or legal entities who have a business relationship with the company, managing organizations and events and corporate communication activities,
- Mergers, acquisitions and re-organizations including by providing information to future purchasers or transferees,
- Tracking legal and financial and/or accounting transactions,
- And ensuring that the data are accurate and up to date.

**c) Individuals/entities to which personal data can be transferred for the aforementioned purposes**

Limited to the aforementioned purposes, your personal data may be transferred to the persons or entities permitted by the provisions of Capital Market Law 6362, Law 5549 on the Prevention of Laundering of Crime Revenues, and other applicable legislation; public entities and regulatory authorities such as BDDK, SPK, BIST, MKK, MASAK, Takasbank, TSPB, SPL, ISKUR; government agencies and institutions such as ministries, judicial authorities; UBS group employees, legal, financial and tax advisors, auditors; our main shareholders, group companies, subsidiaries, trustees and/or their agents; program partner organizations and other third parties operating in your home country or abroad which we collaborate with and receive services from in order to conduct our investment services and activities and ancillary services, including in the context of cloud services and outsourcing, within the framework of the personal data processing requirements and purposes specified in articles 8 and 9 of the KVKK.

**d) The method for collecting personal data and legal grounds**

While your personal data may vary depending on the services provided by CSIMD and the activities of CSIMD, it can, in accordance with the KVKK, be collected verbally, in writing, in the form of audio or video recording or through other physical or electronic means, in offices and other physical environments where you can contact CSIMD, by electronic mail addresses, customer registration forms and similar means, using automated or non-automated methods, via other group companies or other individuals and organizations which they have a contract with.

Video camera recording systems in the CSIMD office building record video footage to protect employees, buildings and assets, to maintain security and to detect and prevent anti-social and criminal behavior in this context, and these records are stored for 30 days.

Your personal data is collected, processed, transferred and stored under conditions consistent with the legislation for the purposes outlined in section (b) of this Privacy Statement and for the period required by the legal obligations or permitted by the applicable legislation based on the general principles of article 4 as well as legal grounds referred to in articles 5 and 6 of KVKK, such as express consent, establishment or performance of a contract, fulfillment of legal obligation, establishment, exercise or protection of any right, legitimate interests of the data controller provided that it does not violate the fundamental rights and freedoms of the data subject.

#### **e) Transfer of personal data abroad**

As per article 9 of KVKK and in accordance with CSIMD's legitimate and lawful reasons for processing personal data, your personal data may be transferred to the institutions and organizations from which we receive services and collaborate with, our main shareholders, group companies, subsidiaries, trustees and/or their agents, and if you have given express consent or even if have not given explicit consent, to foreign countries where a data controller who has or guarantees an adequate level of data protection is located, e.g. pursuant to standard contract articles, under the provisions set out in the KVKK.

#### **f) Your Rights as per Article 11 of KVKK**

##### **You have a right to:**

- learn whether we process your personal data,
- request information if we process your data,
- learn the purpose of processing and whether or not it is used in accordance with this purpose,
- know the third parties in your home country or abroad to which your personal data is transferred,
- request rectification of the incomplete or inaccurate data,
- request erasure or destruction of you personal data under the conditions stipulated in article 7 of the KVKK,
- request that actions taken under points above are notified to the third parties to which we transferred your personal data,
- object to processing of your personal data exclusively by automatic means, which leads to an unfavourable consequences for you,
- request compensation for the damage arising from the unlawful processing of your data.

You can submit your request including your explanation about the rights set out in article 11 of the KVKK which you are requesting to exercise along with your documents that verify your identity by completing the Personal Data Subject Application Form in full under Personal Data Protection Law 6698 at <https://www.credit-suisse.com/tr/en/investment-banking/financial-regulatory/turkey-financials.html?=&reload>;

and personally delivering, submitting through a notary, or posting via certified mail a copy with wet signature to "Credit Suisse İstanbul Menkul Değerler A.Ş. Levazım Mahallesi, Koru Sokak No:2 Zorlu Center, Terasevler No:61, 34340 Beşiktaş İstanbul", by signing with secure electronic signature and sending an e-mail to "[list.csimd@credit-suisse.com](mailto:list.csimd@credit-suisse.com)" or sending a copy with secure electronic signature to "[csimd.uyum@hs03.kep.tr](mailto:csimd.uyum@hs03.kep.tr)" through your Registered Electronic Mail (KEP) account.

You may exercise your rights as of 10/07/2016, the effective date of the regulation, and we reserve the right to ask you to reimburse the costs incurred by CSIMD in order to ensure that your requests are fulfilled, in accordance with the tariff specified in article 13 of KVKK, under the heading "Application to the Data Controller".

#### **g) Cases where consent is not required**

In accordance with subclause 2 of article 5 of KVKK no. 6698, CSIMD has the right to process personal data without obtaining express consent to the extent that: it is expressly set out in law; processing personal data of the contractual parties is required provided that is directly related to drawing up or performance of a contract; it is necessary for CSIMD to fulfill its legal obligation in the capacity of data controller, that it is made public by the concerned person; that data processing is required to establish, exercise or protect a right; that data processing is required for legitimate interests of the data controller, CSIMD, provided that it does not undermine the fundamental rights and freedoms of the person concerned; and in the case of exceptions specified in the Capital Markets Law and other applicable legislation.

**h) Storing and deleting personal data**

We only process and store your personal data to the extent that is necessary to fulfill our contractual and legal obligations. In this regard, it should be noted that our business relationship is an ongoing obligation that spread out over years. We normally keep your records for at least ten years from the end of our relationship (except phone records stored for 3 years and video camera recording system stored for 30 days).

If the data is no longer required for the fulfillment of contractual or legal obligations, it is regularly deleted unless limited continued processing is necessary for the following purposes:

- Fulfillment of obligations to preserve records according to commercial and tax law.
- As a brokerage house, we may also face legal holds that require us to keep records for an undefined period of time.