



DATA PROTECTION NOTICE
REGARDING YOUR PERSONAL DATA
(FOR CUSTOMER / POTENTIAL CUSTOMER / SURETY AND GUARANTOR)

The protection of your personal data is important to the BNP Paribas Group.

This Data Protection Notice provides transparent and detailed information about the protection of your personal data by BNP Paribas Finansal Kiralama A.Ş. ("We") located at Gayrettepe Mah. Yener Sok, No:1 K:2-3 Beşiktaş/ Istanbul.

We would like to inform you about your personal data being processed by our Company acting in the capacity of data controller within the scope of the activities carried out for potential customers, customers, sureties and guarantors of customers in accordance with the Law No. 6698 on the Protection of Personal Data ("Law") Art. 10 and the Communiqué on the Procedures and Principles to be followed in the Fulfilment of the Obligation to Inform. The purpose of this Data Protection Notice is to inform you about the data we collect about you, for what reasons we process this data, with whom we share it, how long we will keep the data, what your rights are and how you can exercise these rights.

When you apply for a specific product or service, further information can be provided if necessary.

1. Which Personal Data We Use About You?

We collect and use your personal data, which includes any information that identifies you or allows you to be identified, to the extent necessary within the framework of our activities and to obtain personalized products and services of high standards.

We collect the following personal data about you as well as the services or products we provide to you:

- **identity information** (e.g. name, national identity or passport number, place and date of birth, nationality, gender, photograph),
- **contact details** (e.g. postal address, e-mail address, telephone number),
- **family situation** (e.g. marital status),
- **economic, financial, tax information** (e.g. tax identification number, tax liability, asset value),
- **education and employment information** (e.g. level of education, working life, name of employer, income),
- **banking and financial information** (e.g. bank account details, products and services owned and used, money transfers, assets, declared investor profile, credit history,),
- **Transaction data** (details of the underlying transaction, including full names and addresses of the beneficiaries and contact details for bank transfers, information relating to legal transactions) **Data relating to your habits and preferences** (data relating to your use of our products and services)



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- **Data we obtain from your interactions with us:** our branches (contact reports), websites, mobile apps, social media pages (cookies, connection to online services, connection and tracking data such as IP address), meetings, calls, chats, e-mails, interviews, phone calls,
- **Information about your device:** (IP address, technical specifications, unique identifying data)
- **Information on transaction security:** Login details used to connect to BNP Paribas' website and applications
- **Health data:** If you request, your health data is processed due to the fact that we are an agency to the extent required by the insurance coverage.

Blood group and religion information on identity cards, driving licenses and similar documents are an integral part of the relevant documents and this information is not intended to be processed by us; however, since this information is included on the documents in question, it is acquired by our Company outside our disposal.

2. To whom is this information relevant and whose personal data do we collect?

We collect this data directly from you (when you contact us, when you visit us, our website or applications, when you use our products and services, when you participate in a survey or an event with us) because you are a customer, potential customer or a party guaranteeing the transaction, such as a guarantor, warrantor, etc. We also collect data from other individuals indirectly from you that is relevant to the transaction. Thus, we collect information about individuals who do not have a direct relationship with us but who are guarantors, guarantors and transaction-related individuals with you, our customers or potential customers. For example;

- Family members
- Your heirs and beneficiaries,
- Your joint debtor/guarantor,
- Your employees and authorized persons such as accountants, lawyers etc.
- Your legal representative (proxy),
- Beneficiaries of your payment transactions,
- Beneficiaries of your insurance contracts or policies and fiduciary transactions (trusts),
- Your hosts
- Your final beneficiaries,
- Your debtors (e.g. in case of bankruptcy),
- Your company shareholders,
- Drawers, endorsers, etc. of negotiable instruments such as cheques, promissory notes, etc.

When you provide us with the personal data of the third parties listed above, do not forget to inform them that we process their personal data and direct them to the current Data Protection Notice.

In order to verify and enrich our database; we also obtain personal data from the following persons:

- Other BNP Paribas organizations,
- Our customers (corporate or individual),



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- Payment service providers and database service providers (accounting service providers)
- Third parties, such as credit reference agencies and fraud prevention organizations or data brokers who are assured that they collect the relevant information lawfully,
- Publications/databases provided by public authorities or third parties (e.g. Official Gazette, databases operated by financial supervisory authorities)
- Websites/social media accounts of legal entities or professional client information publicly disclosed by you (e.g. your own website or social media)
- Public information, such as information from the press.

3. Why and on what basis do we use your personal data?

In this section, we explain how and why we use your personal data and draw your attention to our data processing activities that we think may be more effective for you and for which your consent will be required in some cases.

a. In order to comply with our legal obligations

We use your personal data to comply with banking and other financial regulations:

- Monitoring of transactions to detect abnormalities/ deviations from normal,
- Managing, preventing and detecting fraud,
- Monitoring and reporting risks of fraud to which we or the BNP Paribas Group may be exposed (financial, credit, legal, compliance or reputational risks, default risks, etc.)
- Where necessary, keeping records of telephone calls, chats, (chat) e-mails, etc. and other communication records to be used as described hereinafter,
- Prevention and detection of money laundering and financing of terrorism and compliance with the legislation on sanctions and embargoes within the scope of the Know Your Customer (recognizing you, identifying you, screening your information in sanctions lists and identifying your profile) process,
- Contributing to the fight against tax evasion and fulfilment of tax control and notification obligations,
- Recording of transactions for accounting reasons,
- Exchange of information in terms of tax law,
- Preventing, identifying and reporting risks related to Corporate Social Responsibilities and sustainable development,
- Detection and prevention of bribery,
- Fully authorized local and foreign fiscal, tax, administrative, criminal or judicial authorities, mediators or arbitrators reporting different transactions, operations or orders of law enforcement agencies, government agencies or public institutions or their response to an official request

b. To conclude a contract with you or to take steps according to your request prior to the contract



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We use your personal data to manage our relationship with you and to enter into or perform a contract with you, mainly for the following reasons:

- To determine your credit risk score and repayment capacity,
- To assess whether we can offer you a service or product or on which terms (e.g. price) (e.g. based on your credit risk score or a special offer), to carry out marketing activities,
- To carry out the contract process, sales and after-sales services,
- In particular, to help you by responding to your requests and complaints,
- To carry out customer satisfaction and loyalty activities to our products/services,
- Providing you or our corporate customers with products or services that manage outstanding debts (identification and exclusion of customers with outstanding debts).

c. Protecting our legitimate interests

We use your personal data, including your transaction data, for the purposes set out below.

- Risk management purposes;
 - Proof of transactions, including electronic evidence
 - Managing, preventing and detecting counterfeiting,
 - Performing legal actions such as asserting legal rights and defending legal disputes,
 - Development of individual statistical models to help determine your creditworthiness
- Personalizing the offers that our Company and other BNP Paribas institutions will make to you by the methods listed below;
 - Improving the quality of our products and services
 - Promotion and marketing of products or services appropriate to your situation and profile
 - Making tailor-made commercial offers, minimization your preferences and needs for this, increasing process efficiency
 - These personalization can be obtained as follows:
 - Classifying our potential customers and existing customers,
 - Analyzing your habits and preferences in various communication channels (visits to our branch, e-mails or messages, visits to our website, etc.)
 - Share your personal data with other BNP Paribas entities, in particular if you are or will be a customer of another BNP Paribas entity,
 - Match the products or services you already use with other data we hold about you (e.g. that you have children but have not yet taken out family protection insurance); and
 - Monitor transactions to identify transactions that deviate from the normal process,
 - Consideration of common characteristics or behaviors of existing customers and searches for other individuals who share the same characteristics for targeting purposes.

4. With Whom Do We Share Your Personal Data?

- In order to carry out risk management, audit and activities in accordance with the legislation;



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- Risk management data including credit and operational risks (risk rating/credit score etc.),
- Your data collected for sanctions, embargoes and Know Your Customer within the framework of anti-money laundering / combat with financing of terrorism legislation
- Your data within the scope of risk prevention, detection and anti-fraud

The information is shared with group companies in Turkey or abroad.

- Your information for the purpose of conducting contract, sales and after-sales service processes and to the extent required for this purpose is shared with;
 - The domestic or foreign seller, distributor, importer of the movable or immovable property subject to the contract we make with you,
 - The relevant insurance company in order to make the necessary insurance contract and all other related insurance transactions within the scope of the contract we have made with you,
 - Third parties such as domestic or foreign sureties, guarantors, banks, etc. who have given guarantees to the contract we have made with you,
 - If you are or will be a customer of another BNP Paribas organization, with group companies at home or abroad,
 - domestic or foreign suppliers and other service providers (e.g. IT services, transport, printing services, surveys, communications, debt collection, consultancy, consultancy, distribution and marketing),
 - payment service providers at home or abroad (information from your payment account)
- For the fulfilment of our legal obligations, your information to the extent required for this purpose is shared with;
 - domestic credit reference agencies (e.g. Risk Centre),
 - competent administrative, judicial and private authorities, arbitrators or mediators, law enforcement agencies, state and public institutions,
- For the purpose of fulfilment of legal proceedings; your information to the extent required for this purpose is shared with; domestic and foreign lawyers, notaries, auditors (litigation, audit, etc.).

Data transfer to parties abroad is carried out in accordance with Articles 8 and 9 of the Law, based on the existence of one of the conditions in Articles 5 and 6 of the Law and the standard contract as published by the Personal Data Protection Authority concluded with the party to which data is transferred.

Aggregated or anonymized information sharing

We may share aggregated or anonymized information with partners inside and outside the BNP Paribas Group, such as research groups, universities, advertisers. You will not be able to be identified from this information.

Your data may be provided in aggregated form as anonymized statistical data to professional customers to help them improve their business. In this case, your data will never be disclosed and



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the recipients of this information will not be able to identify themselves from the anonymized statistical data.

5. For How Long Will We Keep Your Personal Data?

We will retain your personal data for a period of time that is appropriate to comply with applicable laws and regulations as well as our operational requirements, such as the proper maintenance of accounts, facilitating customer relationship management and responding to legal claims and demands.

6. What are your rights and how can you exercise them?

Pursuant to Art. 11, you have the following rights regarding your personal data:

- To learn whether personal data is processed or not
- Request information if personal data has been processed
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose
- To know the third parties to whom personal data are transferred domestically or abroad
- To request correction of personal data in case of incomplete or incorrect processing
- Request deletion or destruction of personal data
- In case of correction, deletion or destruction of personal data, to request notification of these transactions to third parties to whom personal data are transferred
- To object to the occurrence of a result to the detriment of the person himself/herself 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

As a data subject, you can communicate your rights listed above to Us in writing by one of the following methods:

- by hand or by registered mail with return receipt requested or through Notary Public to the address Gayrettepe Mah. Yener Sok. No:1 Kat:2-3 34349 Beşiktaş / Istanbul .
- By e-mail to kvktalepyonetimi@tr.bnpparibas.com e-mail address.
- Through Registered Electronic Mail (KEP) account can be sent to bnppfinansalkiralama@hs03.kep.tr via KEP.

When submitting your request, please attach a copy of your valid identity document to your application so that we can determine your identity. Additional information and documents may be requested by our Company in order to verify the identity of the applicant and to clarify the applicant's request. If such information and documents are not shared, the application of the data subject may not be answered.

Our Company will finalize the requests of the personal data subjects regarding their rights listed above in writing, by other methods to be determined by the Authority or by the procedures specified in the Communiqué on the Procedures and Principles to be followed in the Fulfilment of the Obligation to Inform, as soon as possible and within thirty days at the latest after the date of



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transmission. The applications of data subjects may be charged a fee in line with the tariffs published by the Authority.

In accordance with the relevant regulations, you also have the right to lodge a complaint with the competent supervisory authority after our response to your request.

7. How Can You Track Changes on the Data Protection Notice?

In a world of constant technological change, we may need to update this Data Protection Notice on a regular basis.

We invite you to review the most recent version of this notice on our website; we will notify you of any material changes separately on our website or through our other communication channels.

8. How can you contact us?

If you have any questions regarding the use of your personal data under this Data Protection Notice, please contact us via our Call Centre at 0216 645 96 96 or kvktalepyonetimi@tr.bnpparibas.com.