

# DATA PROTECTION NOTICE REGARDING YOUR PERSONAL DATA (FOR SUPPLIERS)

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.

This text has been prepared in order to inform you about your personal data being processed by our Company acting in the capacity of data controller within the scope of activities for its suppliers within the framework of the Law No. 6698 on the Protection of Personal Data ("Law") Art. 10 and the Communiqué on 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 which 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 the products and services we receive from you.

We collect the following personal data about you as well as the services or products we receive from you:

- identity information (e.g. name-surname, Turkish ID, place and date of birth, nationality, gender, photograph,),
- contact details (e.g. postal address, e-mail address, telephone number),
- **economic, financial, tax information** (e.g. tax identification number, tax liability, asset value),
- banking and financial information (e.g. bank account details, money transfers, ),
- **Transaction data** (full names and addresses of beneficiaries and information about legal transactions)
- Data we obtain from your interactions with us: our mobile apps, connection and tracking data such as IP address), meeting, email, conversation, phone call,
- **Information about your device:** (IP address, technical specifications, unique identifying data)
- **Transaction security information:** Login details used to connect to BNP Paribas' website and applications

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, visit us, our website or applications, participate in a survey or an event with us) because you are a "supplier" who supplies goods or services to Us under the names of seller, dealer, distributor, service provider, auditor, consultant and other names. We also collect your data indirectly from you as well as from other individuals related to our transaction with you. Thus, we collect information about individuals who do not have a direct relationship with us but are connected with you and the transaction. For example;

- Your employees and authorised persons such as accountants, lawyers, etc,
- Your legal representative,
- Your ultimate beneficiaries and 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 organisations,
- Our customers (corporate or individual)
- Payment service providers and database service providers (accounting service providers)
- Third parties, such as credit reference agencies and fraud prevention organisations 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,
- Compliance with the legislation on sanctions and embargoes within the scope of prevention and detection of money laundering and financing of terrorism,
- 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 authorised 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

We collect your personal data in order to manage our relationship with you, to conclude a contract with you, to perform the contract, to carry out sales and after-sales service processes.

## 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,

## 4. With Whom Do We Share Your Personal Data?

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

It is shared with group companies in Turkey and abroad.



- Your information for the purpose of carry out the 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 organisation, with group companies at home or abroad,
  - domestic or foreign suppliers and other service providers (e.g. IT services, transport, surveys, printing services, communications, debt collection, consultancy and advisory services and distribution and marketing),
  - payment service providers at home or abroad (information from your payment account)
- Your data for the purposes of reporting our company's internal control activities and conducting and auditing company procurement processes with group companies in Turkey and abroad

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- For the purpose of payment transactions; we share your data with the relevant bank branches.
- 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 parties to whom the data is transferred.

## Aggregated or anonymised 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 anonymised statistical data to professional customers to help them improve their business. In this case, your data will never be disclosed and the recipients of this information will not be able to identify themselves from the anonymised 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 analysing 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, 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 <u>kvktalepyonetimi@tr.bnpparibas.com</u> e-mail address.
- Through Registered Electronic Mail (KEP) account can be sent to <u>bnppfinansalkiralama@hs03.kep.tr</u> 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 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 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 with 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