



BNP PARIBAS
LEASING SOLUTIONS

BNP PARIBAS FİNANSAL KİRALAMA ANONİM ŞİRKETİ

Personal Data Processing and Protection Policy

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Version 1

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PREFACE

The right to protection of personal data is one of the fundamental individual rights and freedoms. This right is protected under Article 24 of the Constitution and Article 8 of the European Convention on Human Rights. Law No. 6698 on the Protection of Personal Data was published in the Official Gazette on 7 April 2016 to protect the fundamental rights and freedoms of individuals over their personal data.

1. PURPOSE AND SCOPE

BNP Paribas Finansal Kiralama A.Ş. Personal Data Processing and Protection Policy has been prepared with the main purpose of ensuring transparency and accountability within the framework of the legislation on personal data. In order to ensure transparency and accountability, this policy sets out the purposes and methods of processing personal data processed by BNP Paribas Finansal Kiralama A.Ş. in accordance with the legislation on the protection of personal data and the legal grounds on which they are based, shows the security measures taken for the storage periods and protection of personal data, and sets out the principles regarding the applications to be made by the Data Subjects.

BNP Paribas Finansal Kiralama A.Ş. Personal Data Processing and Protection Policy covers all real persons whose personal data are processed by our company.

2. DEFINITIONS

The definitions used in the policy and which should be explained for the integrity of the text are as follows:

- **Explicit consent:** Consent on a specific subject, based on information and expressed with free will.
- **Relevant user:** Persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except for the person or unit responsible for the technical storage, protection and backup of the data.
- **Anonymization of personal data:** Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
- **Personal data:** Any information relating to an identified or identifiable natural person.
- **Processing of personal data:** Any operation 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 by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.
- **Erasure of personal data:** Deletion, destruction or anonymization of personal data.
- **Deletion of personal data:** Making personal data inaccessible and non-reusable for the users concerned.
- **Destruction of personal data:** Making personal data inaccessible, unrecoverable and unusable by anyone in any way.
- **Authority:** Personal Data Protection Authority.

- **PDP Law:** Law No. 6698 on the Protection of Personal Data.
- **Special Categories of Personal Data:** Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
- **Policy** BNP Paribas Finansal Kiralama A.Ş. Personal Data Protection and Processing Policy.
- **BNPP FK** BNP Paribas Finansal Kiralama A.Ş.
- **Data processor:** A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.
- **Data recording system:** A recording system in which personal data are structured and processed according to certain criteria.
- **Data subject** or **natural person concerned:** The natural person whose personal data is processed.
- **Data Controller:** The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

3. IDENTITY OF THE DATA CONTROLLER

Information regarding the identity of the data controller for all kinds of personal data processing activities covered by this Policy is given below.

Data Controller : BNP Paribas Finansal Kiralama A.Ş.
Trade Registry No.: 267312
Mersis No. : 0295001447100014
Address : Gayrettepe Mah. Yener Sok. No: 1 K:2-3 34349 Beşiktaş/ Istanbul

4. GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

Article 4 of the PDP Law sets out the basic principles to be followed in the processing of personal data. These principles are taken into consideration and rigorously applied within the scope of all personal data processing activities carried out by BNPP FK. These principles and related explanations are given below:

- **Compliance with the law and good faith:** In fulfilling its obligation to process and protect personal data, BNPP FK acts in accordance with the general principles of law and the rule of honesty regulated in the Turkish Civil Code.
- **Ensuring that personal data is accurate and up-to-date:** Ensuring that personal data provides accurate and up-to-date information about individuals is of great importance for the protection of individuals' rights. BNPP FK takes reasonable care to ensure that the personal data being processed are accurate and up-to-date.
- **Processing personal data for specific, explicit and legitimate purposes:** The purposes to be achieved by processing personal data constitute the most important criterion in determining whether the personal data processing activity is lawful. In this context, the PDP Law requires data processing activities to be processed for specific, explicit and legitimate purposes. Within the framework of this principle, BNPP FK carries out personal data processing activities for specific, explicit and legitimate purposes required by its commercial activities.
- **Being relevant, limited and proportionate to the purpose for which they are processed:** BNPP FK processes personal data in connection with its business activities

and to the extent the processing is required and sufficient to realize its objectives. BNPP FK also acts in accordance with the principle of limitation and proportionality by refraining from processing personal data that are not needed.

- **Retention for the period stipulated in the relevant legislation or required for the purpose for which it is processed:** Personal data processed by BNPP FK are retained by BNPP FK for the period until the personal data processing purposes are not valid anymore and until the end of the legal retention periods, if any, stipulated for the storage of such data. When the aforementioned purposes disappear and the legal retention periods expire, the retention of the relevant personal data will be terminated by BNPP FK.

5. CONDITIONS OF PROCESSING PERSONAL DATA

The PDP Law lists the conditions for processing personal data under Article 5. If the purposes of processing personal data by a data controller can be evaluated within the framework of the personal data processing conditions listed in the PDP Law, that data controller can process personal data in accordance with the law. In this context, personal data processing activities are carried out by BNPP FK in cases where the personal data processing purposes pursued by BNPP FK can be evaluated within the scope of the personal data processing conditions set out in the PDP Law. BNPP FK does not carry out any personal data processing activities that do not fall within the scope of personal data processing conditions.

The personal data processing conditions in the PDP Law are listed below:

- Explicit consent of the person concerned
- Explicitly stipulated in the law
- It is mandatory for the protection of the life or body integrity of the person or of another 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 belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract
- It is mandatory for the data controller to fulfil 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 injure the fundamental rights and freedoms of the data subject.

One or more personal data processing conditions that make a personal data processing activity lawful may be applied at the same time.

6. CONDITIONS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

BNPP FK may process special categories of personal data in the presence of the data processing conditions set out in Article 6 of the PDP Law. The conditions for processing special categories of personal data under Article 6 of the PDP Law are as follows:

- Explicit consent of the owner of the special categories of the data
- Cases stipulated by law for personal data other than personal data relating to health and sexual life

- For personal data relating to health and sexual life, only for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, processing by persons or authorized institutions and organizations under the obligation of confidentiality.

Special categories of personal data are not processed for any purpose that would allow discrimination between individuals or in a way that would cause an individual to be subjected to unlawful treatment. Personal data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership, genetic data or sexual life are not processed unless there is a legal obligation. In addition, additional security measures are taken by BNPP FK as stipulated in the relevant legislation in order to ensure the security of special categories of personal data.

7. INFORMATION ON THE PROCESSING OF PERSONAL DATA

Personal data processing activities carried out by BNPP FK are analyzed and planned in detail with a holistic approach for the entire period from the entry of a personal data into the sphere of dominance of BNPP FK legal entity until the destruction of these data. During personal data processing activities, all necessary measures are taken to ensure that the data is processed in accordance with the principles of personal data processing.

Personal data are obtained by BNPP FK through various channels. The personal data collected and the data subjects / person concerned whose personal data are processed by BNPP FK are classified separately depending on the business processes of BNPP FK. Likewise, BNPP FK's personal data processing purposes are also classified under categories. BNPP FK's personal data processing activities are built on these basic categories (business processes, data categories, data subject categories and data processing purposes) and monitored within the framework of an inventory prepared in accordance with the relevant legislation. Detailed information on these issues is provided under the following headings.

7.1. Business Processes in which Personal Data are processed

Classification of personal data is an absolute necessity in order to comply with the legislation on personal data. Article 4/e of the Authority's By-Law on Erasure, Destruction or Anonymization of Personal Data stipulates that this classification shall be based on business processes. Accordingly, BNPP FK processes personal data on the basis of the business processes listed below for information purposes:

- Marketing, purchase and sales processes
- Credit allocation processes
- Customer identification and compliance processes
- All operational processes such as contracts, guarantees, insurance, purchase etc.
- Internal control and operational risk processes
- Accounting, treasury and financial control processes
- Credit monitoring and legal follow-up processes
- All human resources processes related to recruitment, payroll and personnel transactions, health insurance, fringe benefits, etc.

BNPP FK may change the above-mentioned business processes due to reasons such as BNPP FK's way of doing business, technological developments and legislative changes. In such cases, it will be ensured that the business processes are expressed in an up-to-date manner by updating the Policy in order to maintain transparency and accountability.

7.2. Channels through which Personal Data is Obtained

The personal data acquisition channels of BNPP FK, which carries out financial leasing and operating leasing activities, are listed below:

- Publications/databases prepared by public authorities
- Third parties such as credit reference agencies and fraud prevention agencies such as Credit Bureau, Risk Centre etc. operating in accordance with the data protection legislation
- Websites or social media accounts containing information publicly disclosed by the data subject/person concerned (e.g. the data subject/person concern’s own website or social media accounts)
- Seller, distributor, importer, manufacturer of the goods to be financed
- Our corporate customers, service providers
- Publicly available databases provided by third parties (e.g. Chambers of Commerce and Tradesmen and similar unions and associations)
- Data we obtain from the interactions of the data subject/ person concerned with BNPP FK: BNPP FK branches (contact reports), websites, mobile applications, social media pages, meeting, call center, chat, e-mail, interview, phone call
- Camera recordings (including CCTV (closed circuit video surveillance system)) and geolocation data (e.g. for security reasons, data showing the location of the equipment subject to financing)
- *Cookies* and similar tracking technologies

Depending on technological developments, BNPP FK may add to the above-mentioned channels of obtaining personal data or may abandon the use of some of the existing channels. In such cases, in order to maintain transparency and accountability, the channels used will be accurately expressed by updating the Policy.

7.3. Classification of Personal Data

Classification of personal data is an absolute necessity in order to comply with the legislation on personal data. BNPP FK categorizes the personal data it processes under two categories: personal data and special categories of personal data. Classification is also made according to data types under these categories.

BNPP FK's categories of personal data and special categories of personal data are shared in the table below:

PERSONAL DATA CLASS	CATEGORISATION DESCRIPTION
Identity Data	Regarding the identity information of natural person’s personal data will be evaluated under this category.

Contact Data	All kinds of personal data that can be used for communication purposes with individuals will be evaluated under this category.
Data on Family Status	Information on the family and relatives of the persons will be included under this category. The fact that the data subject belongs to a customer, employee or other data subject category does not have any matter.
Data on Education, Labour and Professional Life	All kinds of data will be included under this category on the education and working life of individuals
Data on Financial Products, Assets and Financial Status	All kinds of data regarding their current financial status, money and goods assets of individuals, the financial products they use and will be classified under this category.
Data on Financial Transactions	Records related all kinds of financial transactions carried out by employees and employee candidates at Türk Ekonomi Bankası A.Ş. will be included under this category.
Data on Risk Management and Financial Security	Within the scope of risk management processes, all information that can be used to ensure BNPP FK's financial security and risk management activities such as Know Your Customer Principles (KYC), Anti-Money Laundering (AML) and Antifraud (Antifraud) will be evaluated in this data category
Data on Guarantors	All kinds of information on real persons who have established a surety relationship with BNPP FK will be evaluated under this category.
Data on Shareholders and Ultimate Beneficiaries	Personal data of real person shareholders and ultimate beneficiaries of legal entities that have commercial relations with BNPP FK within the scope of MASAK legislation, financial control and compliance control rules during the customer acceptance process are evaluated under this category.
Marketing Data	All kinds of personal data that may serve for the purpose of marketing the products and services of our company, which can be used in marketing activities for individuals will be evaluated under this category.

Data on the Security of Company Campuses	All personal data collected within the framework of the activities of ensuring the physical security of the Company's premises are evaluated under this category.
Data on the Company's Information Security	All kinds of personal data that can be utilized within the scope of ensuring the information security of the Company is covered under this category.
Data on Audits and Inspections	Information obtained or any results generated with the interpretation of information obtained during audits and inspections will be classified under this data category.
Request, Complaint and Reputation Management Data	The types of personal data that can be processed within the scope of request, complaint and reputation management processes differ according to the nature of the relevant event. For this reason, all kinds of personal data that can be used within this scope will be evaluated under this category.
Employee Data	All kinds of personal data relating to employees being processed within the framework of the labor contract will be evaluated under this category.
Employee Candidate Data	The personal data of all persons who come into contact with BNPP FK in any way as an employee candidate, whether or not a labor contract is subsequently concluded, will be included under this category. Personal data collected even if the person does not have an active application, but makes his/her CV generally available, will be included in this category. .
PERSONAL DATA OF SPECIAL CATEGORY CLASSIFICATION	CATEGORISATION DESCRIPTION
Health Data	All kinds of personal data on the health and health status of individuals will be included under this category.
Sensitive Personal Data	Sensitive personal data categories are listed in the law as data types that are granted special protection. In this context, except for those listed in the PDP Law, any personal data (including Turkish ID number) will not be included under this classification.
Biometric Data	Biometric data types are included under this category.

7.3. Data Subject Classification

Data subjects are the focal point of this policy and therefore of BNPP FK's personal data processing activities. The categorization allows for more effective protection of the rights of data subjects and efficient communication with data subjects. BNPP FK's classification of data subjects is in the table below:

PERSONAL DATA SUBJECT CLASSIFICATION	CATEGORISATION DESCRIPTION
Customer	Persons or organizations associated with them who are beneficiary of any product or service of BNPP FK.
Potential Customer	Persons, organizations or persons who wish to benefit from any product or service of BNPP FK or to whom BNPP FK wishes to provide products or services..
Supplier	Persons, organizations or persons associated with them who providing goods or services to BNPP FK.
Business Partner	Persons, organizations or persons associated with them with whom BNPP FK works under cooperation agreements.
Counsellor	Persons, organizations or persons associated with them who provide external counselling service to BNPP FK.
Company Shareholder	Persons, organizations or persons associated with them in the shareholding structure of BNPP FK.
Board Member	Person who is appointed as a board member at BNPP FK in accordance with the relevant legislation.
Employee - Intern	Persons who BNPP FK accepts as employees and trainees within the scope of the employment relationship. .
Employee Candidate	Persons who apply for a job to become an employee in our company.
Other	Other than the above, persons, organizations or persons associated with them who have established a continuous or individual, direct or indirect relationship with BNPP FK.

7.4. Purposes of Processing Personal Data

The purposes of processing personal data are of great importance in determining which of the conditions for processing personal data are applicable to the concrete data processing activity. For example, while a data processing purpose may require obtaining explicit consent, which is one of the data processing conditions, another data processing purpose may enable the data processing activity to be carried out only by fulfilling the obligation to inform without obtaining explicit consent due to the existence of one or more of the other data processing conditions.

The purposes of personal data processing are classified by BNPP FK in order to ensure transparency and accountability. The purposes under the said classes are included in the disclosure text provided to the data subjects. Thus, it is ensured that data subjects are clearly informed about the data processing purposes of BNPP FK.

The purposes of data processing by BNPP FK are listed for information purposes:

- To fulfil our legal obligations
 - Compliance with banking regulations and financial regulations
 - Taking security measures to prevent abuse and fraud
 - Detection of transactions that are out of normal/ deviate from normal
 - To determine the credit risk score and repayment capacity of the financing requestors
 - Monitoring and reporting risks to which BNPP FK may be exposed
 - Keeping records of telephone calls, correspondence, e-mails, etc. when its necessary
 - Responding to an official request of an authorized public or judicial authority
 - Prevention of money laundering and financing of terrorism
 - Compliance with legislation on sanctions and embargoes
 - Combating tax evasion and fulfilment of tax control and notification obligations
- To enter into contracts with the relevant persons and to establish transactions in accordance with their pre-contractual requests
 - To provide information about our products and services
 - Supporting the person concerned and meeting the requests of the person concerned
 - To assess whether, or on what terms, we may offer a service or product
- Protecting our legitimate interests
 - Implement and develop our products and services, improve our risk management and protect our legal rights
 - Proof of transactions
 - Anti-counterfeiting
 - IT management, including infrastructure management (shared platforms), business continuity and IT security
 - Creating individual statistical models based on the analysis of transactions, helping to define the credit risk score of the person concerned as of today
 - Creating aggregated statistics, tests and models for research and development activities carried out to improve the risk management of our Group companies or to improve existing products and services or to create new ones
 - To train our staff by recording the telephone calls of our Call Centre

- Personalising the offers to be made by our Company and other BNP Paribas institutions to the relevant persons by the methods listed below:
 - Improving the quality of our banking, financial or insurance products and services
 - Promotion of products or services suitable for the status and profile of the data subject / person concerned

These can be obtained as follows:

- Classifying our potential customers and current customers
 - Analyzing habits and preferences in various channels (visits to our branch, e-mails or messages, visits to our website, etc.)
 - Sharing personal data with other BNP Paribas entities if the data subject is or will be a customer of another BNP Paribas entity
 - match data about products or services that the data subject already uses with other data we hold about that data subject
- Monitor transactions to identify transactions that deviate from the normal process. Personal data may be subject to anonymized statistics in order to help professional clients to improve their business. In this case, personal data will never be disclosed and the recipients of these anonymized statistics will not be allowed to identify the persons concerned.

The above-mentioned upper purposes may change depending on the development of BNPP FK's personal data processing activities. By updating the policy, new purposes will also be submitted to the information of data subjects.

8. STORAGE AND DESTRUCTION OF PERSONAL DATA

Personal data is of great importance in terms of financial leasing and operating leasing activities, which constitute the main field of activity of BNPP FK. The fact that a company has sufficient information about all individuals with whom it communicates, especially its customers, ensures both the protection of the rights of the relevant individual and the economic security of the country. Having this awareness, BNPP FK stores the personal data of the data subjects whose personal data is processed by taking the necessary technical and organizational security measures in electronic and physical environments.

BNPP FK's personal data retention period is calculated by taking into account the periods specified in Law No. 6361, Commercial Code, MASAK and other relevant legislation. Despite the expiry of these periods; personal data of individuals will continue to be processed and stored in the presence of data processing purposes that will ensure the existence of any of the personal data processing conditions specified in the PDP Law.

Personal data will be destroyed by BNPP FK in the event that the purposes of personal data processing that will eliminate the existence of the personal data processing conditions specified in the PDP Law cease to exist and the legal retention periods have expired. Such destruction operations are carried out ex officio in maximum six-month periods in accordance with the provisions of the relevant legislation or finalized if required by the requests from the data subjects.

The destruction of personal data by BNPP FK is carried out by using deletion, anonymization or destruction techniques depending on the media in which the personal data is located. Detailed information on these techniques is provided in the By-Law on Erasure, Destruction or Anonymization of Personal Data published by the Authority.

Namely, BNPP FK stores the personal data it processes in physical and electronic environment in order to fulfil its main activity of financial services. Within the scope of its commercial activities, BNPP FK acts in accordance with the retention period and obligations of personal data in accordance with the PDP Law and other relevant legislation regarding the protection of personal data and erases or anonymizes the data spontaneously or upon the application of the data subject, with the exception of the retention periods stipulated by the legislation. In case of erasure, destruction or anonymization of personal data, these data will be destroyed in such a way that they cannot be used and recovered in any way.

9. SHARING PERSONAL DATA WITH THIRD PARTIES

Due to the requirements of financial leasing and operating leasing activities, BNPP FK may share personal data with persons/institutions located in Turkey or abroad. In order for such sharing to be realized, BNPP FK may share personal data with persons/institutions in Turkey or abroad in accordance with the requirements of the PDP Law and for the purposes that meet the data processing conditions. The Company pays utmost attention to its existence. In addition, the Company takes all necessary technical and administrative measures to ensure the level of security measures in accordance with the requirements of the legislation for data sharing.

Our company, which carries out its activities in Turkiye as a member of the BNP Paribas group, takes great care to protect the personal data of individuals with the responsibility of being a partner of a global financial institution.

In order to monitor the sharing of personal data by BNPP FK, the persons shared are categorized into the following classes:

SHARED PARTIES	EXAMPLES OF SHARING PURPOSE
Legally Authorized Public/Private Institution or Organization	Data can be shared with official institutions and organizations such as BRSA, CMB, MASAK and the Central Bank of the Republic of Turkey.
Direct or Indirect Shareholders	Data can be shared with BNPP FK's shareholders in accordance with the relevant legislation.
Supplier/Business Partner/Consultant	Data can be shared with the consultants, organizations and parties from which the Company receives services that are complementary to its activities and with which it cooperates limited to the purposes of the activities they carry out.

Insurance Companies	Data can be shared with insurance companies in their capacity in order for BNPP FK to carry out its activities both as an agency and for the insured, the policyholder or the principal-executor. .
Banks Association of Turkey (TBB) Risk Centre	In line with the relevant legislation, data can be shared with the Risk Centre established at the TBB.
BNP Paribas Group Companies	Data may also be shared within the framework of Article 73 of the Banking Law in order to carry out commercial activities that require the participation of BNP Paribas Group companies, including the Türk Ekonomi Bankası
Other Persons	The persons to whom your data may be transferred other than those mentioned above are evaluated under this category

10. OBLIGATION TO INFORM

Pursuant to Article 10 of the PDP Law, BNPP FK will fulfil the obligation to inform mentioned in the PDP Law by providing the following information to the data subjects during the acquisition of personal data:

- Identity of the data controller and its representative, if anyThe purpose for which personal data will be processed
- To whom and for what purpose the processed personal data can be transferred
- Method and legal grounds for collecting personal data
- 11. other rights listed in Article

In order to fulfil the obligation to inform, BNPP FK prepares appropriate data protection notices to be used at the points of contact with data subjects while performing financial leasing and operating leasing activities and provides them to data subjects. In addition, this Policy also serves the purpose of fulfilling the obligation to inform.

However, BNPP FK has no obligation to inform pursuant to Article 28 of the PDP Law in the following cases:

- Processing of personal data is necessary for the prevention of crime or criminal investigation
- Processing of personal data made public by the data subject himself/herself
- Personal data processing is necessary for the execution of supervisory or regulatory duties and for disciplinary investigation or prosecution by the public institutions and organizations and professional organizations in the nature of public institutions, which are authorized and mandated based on the authority granted by law
- Personal data processing is necessary for the protection of the economic and financial interests of the state in relation to budget, tax and financial matters

11. RIGHTS OF THE DATA SUBJECT

The rights granted to data subjects under Article 11 of the PDP Law are listed below:

- To learn whether their personal data is being processed or not
- To 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
- To request the deletion or destruction of personal data processed in accordance with the provisions of the PDP Law and other relevant laws, in the event that the reasons requiring the processing of personal data disappear, and to request notification of the transaction made within this scope to third parties to whom personal data is 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 c a s e of damage due to unlawful processing of personal data, to demand compensation for the damage

BNPP FK shall use all necessary administrative and technical measures in accordance with the requirements of the legislation in order to ensure that each data subject can comfortably exercise the rights granted to data subjects by the PDP Law.

Data subjects may exercise the above-mentioned rights at <https://leasingsolutions.bnpparibas.com.tr/veri-gizlili-iletisim-formu/> They can fill in the application form published at the address of BNPP FK and send it to BNPP FK by the following methods:

- By post to the BNPP FK's address Gayrettepe Mah. Yener Sok. No:1 Kat:2-3 34349 Beşiktaş /Istanbul.
- It can be sent by e-mail to kvktalepyonetimi@tr.bnpparibas.com e-mail address.
- It can be sent to bnppfinansalkiralama@hs03.kep.tr via Registered Electronic Mail (KEP) account via KEP.
- Employees and prospective employees can send an e-mail to kisiselveriyonetimi@tr.bnpparibas.com.

BNPP FK will finalize the requests of personal data subjects regarding their rights listed above in writing or by other methods to be determined by the Authority as soon as possible and within thirty days at the latest after the date of transmission. The applications of data subjects may be charged within the framework of the tariffs published by the Authority.

In order to respond to the applications made by data subjects, BNPP FK may request additional information and documents 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.

12. MEASURES FOR THE SECURITY OF PERSONAL DATA

BNPP FK takes all reasonable care and diligence to ensure the confidentiality and security of the personal data it processes, with the awareness of its responsibility as a financial leasing company. In addition to the requirements of financial leasing legislation, BNPP FK takes all necessary technical and organizational measures at a reasonable level to ensure data confidentiality and security within the framework of Article 12 of the PDP Law. With these organizational and technical security measures, it is aimed to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to maintain personal data at an appropriate security level.

In the event that personal data are processed on its behalf by another natural or legal person (data processor), BNPP FK shall ensure that the above-mentioned measures are also taken by the relevant data processors.

In the event that personal data is unlawfully obtained by third parties, it will notify the data subjects, the Authority and other relevant public institutions and organizations in accordance with the provisions of the relevant legislation.

While taking measures regarding the security of personal data, the Personal Data Security Guide (Technical and Organizational Measures) published by the Authority is taken into consideration.

13. OTHER PROVISIONS

In the event that this Policy is incompatible with other BNPP FK policies, BNPP FK shall ensure harmonization between both policies by taking into account the PDP Law or relevant secondary regulations. In case of incompatibility between the policy and the legislation, the relevant legislation will be applied in priority.

This policy enters into force on the date of publication. The policy may be updated in time within the scope of changing situations and needs.

Any questions regarding this policy can be sent to kvktalepyonetimi@tr.bnpparibas.com. Also employee and employee candidates will be able to send all kinds of questions and requests tokisiselveriyonetimi@tr.bnpparibas.com.

14. ENFORCEMENT AND SUPERVISION

This policy enters into force on the specified effective date and the Group Inspection Board is responsible for its audit.