

**MUFG Bank Turkey A.Ş.**  
**PERSONAL DATA PROCESSING POLICY**

### **1 Data Responsibility and Representative**

The purpose of this Policy is giving explanation to data subjects on systems and personal data processing operations of MUFG Bank Turkey, providing transparency on personal data.

Within the principles explained on **'Purposes of Processing personal Data'** section of this Policy, and according to Article 4, paragraph 2 of KVKK, MUFG Bank Turkey is processing personal data according to the principles explained below:

- Being in conformity with the law and good faith
- Being accurate and if necessary, up to date
- Being processed for specified, explicit, and legitimate purposes
- Being relevant, limited and proportionate to the purposes for which data are processed
- Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected

### **2 Personal Data Processed by MUFG Bank Turkey**

MUFG Bank Turkey processes personal data either by the explicit consent from data subjects or without, according to Articles 5 and 6 of KVKK. These personal data is being processed only for the purposes explained and exemplified in this Policy's section named **'Purposes of Processing Personal Data'**. Personal data types change and diversify according to the type and qualification of the relationship between MUFG Bank Turkey and data subject, used communication channels and mentioned purpose information are as follows:

- Information which introduces the data subject like name, surname, job, title, work information, education status, sex, marital status, information on children, citizenship status, tax status,
- Identity papers like photocopy of id, photocopy of birth certificate, passport and driving license which include data like date of birth, place of birth, id number, blood type, religion and photography
- Together with communication information like address, e-mail, telephone and fax number, recordings like phone calls and e-mail conversations.
- Documents about legal persons which include personal data like tax certificate, trade journal, certificate of authority, credentials, list of authorized signatures and operating certificate.
- Detailed financial data like pricing, negotiation, receipt and payment activity.

### **3 Purposes of Processing Personal Data**

Personal data is being processed and stored for a time permitted by the law within the scope of the following purposes:

- Under legal and administrative obligations, activities MUFG Bank Turkey is obliged to carry out,
- Informing data subject of changes in the law and policy and rules issued by MUFG Bank Turkey,

- Together with investigation, detection, notification and prohibition of illegal activities, management and operation of legal procedures.
- Protection of legitimate interests,
- Negotiation, creation and carrying out of contracts,
- Assessment of applications and questions and replying the individual,
- Together with carrying out marketing and promotion activities, taking feedback from data subjects by polls and votings,
- Administration and development of the web site, helping the development of customer experience
- Distribution of products and services provided by MUFG Bank Turkey,
- Increasing productivity, together with ensuring coordination and workflow between business units,
- Reporting to foreign affiliates and group companies of MUFG Bank Turkey,
- In the processes of job application, candidate evaluation and recruiting, together with reviewing the eligibility of candidate to the role, communicating with the said candidates and other connected persons,
- Recording the visits and tracking parcels,
- Securing and taking necessary precautions according to the evaluations made, the electrical systems and physical environments either belonging to or used by MUFG Bank Turkey.

#### **4 Transfer of Personal Data**

Within the frame explained in **‘Purposes of Processing Personal Data’** section of this Policy and according to the Articles 8 and 9 of KVKK, MUFG Bank Turkey is transferring personal data to foreign countries and personal data may be stored in servers and other electronic environments used for this purpose. Parties involved and the nature of this transfer depend on the relationship type between MUFG Bank Turkey and other party, purpose of transfer and legal requirements and those parties may be generalized as;

- Legal authorities like MASAK (Financial Crimes Investigation Board), SİSBİS (Insurance Abuses Information Sharing System) and establishments which are consulted for legal support like law firms
- Public institutions like Treasury and Revenue Administration,
- foreign affiliates and group companies of MUFG Bank Turkey
- Business units within MUFG Bank Turkey for increasing productivity, together with ensuring coordination and workflow.

#### **5 Collection of Personal Data and Retention**

In order to carry out the purposes explained in **‘Purposes of Processing Personal Data’** section of this Policy and within the frame of the Article 5 and 6 of KVKK, personal data can be collected directly from employees and customers, suppliers, business partners, group companies, call center, government agencies and other physical environments and indirectly from web sites, mobile applications, social media and other public environments or organizations, lectures and similar events.

MUFG Bank Turkey stores personal data within the limits of the retention period dictated by the law to fulfill the purposes written in this Policy and operations regarding these personal data. Personal

data with expired retention period and finished its purpose gets deleted, destroyed or anonymized by MUFG Bank Turkey.

## **6 Rights of the Data Subject According to KVKK**

Data subjects' rights on data controller (MUFG Bank Turkey) are regulated in the Article 11 of KVKK and can be listed as follows:

- Learn whether or not their personal data have been processed
- Request information as to processing if their data have been processed
- Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose,
- Know the third parties in the country or abroad to whom personal data have been transferred,
- Request rectification in case personal data are processed incompletely or inaccurately,
- Request deletion or destruction of personal data within the framework of the conditions set forth under article 7,
- Request notification of the operations made to third parties to whom personal data have been transferred,
- Object to occurrence of any result that is to their detriment by means of analysis of personal data exclusively through automated systems,
- Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

Requests coming from data subjects regarding any of the rights above will be answered by MUFG Bank Turkey in 30 days. These requests can be given directly to MUFG Bank Turkey by visiting the address 'Fatih Sultan Mehmet Mah. Poligon Caddesi Buyaka 2 Sitesi No:8 Kat 20-21 34771 Tepeüstü Ümraniye İstanbul' with identification, through notary public or sending an electronically signed e-mail to the address: [mufgturkey@hs02.kep.tr](mailto:mufgturkey@hs02.kep.tr) If requests are subject to any expense of MUFG Bank Turkey side, MUFG Bank Turkey may request compensation with accordance to the law.

## **7 Transfer of Personal Data to Abroad**

To fulfill processing, storing, management or any other purpose mentioned in this Policy's '**Purposes of Processing Personal Data**', personal data may be transferred abroad in accordance with legislation. Necessary security precautions are taken while carrying out this transfer.

## **8 Security of Personal Data**

MUFG Bank Turkey values the security and secrecy of personal data and thus takes the necessary technical and operational precautions to protect the personal data against unauthorized access, damages, loss or exposal. To access this, necessary systematic access controls, data access controls, secure transfer controls, business continuity controls and other necessary corporate controls are applied.