

BULLS YATIRIM MENKUL DEĞERLER A.Ş.

PERSONAL DATA PROTECTION

PRIVACY NOTICE FOR CUSTOMERS / PROSPECTIVE CUSTOMERS

Pursuant to the **Law No. 6698 on the Protection of Personal Data ("KVKK")**, published in the Official Gazette dated **7 April 2016** and numbered **29677**, particularly Article 10 entitled **"Data Controller's Obligation to Inform"**, as well as the **Communiqué on the Principles and Procedures to be Followed in Fulfilment of the Obligation to Inform**, published in the Official Gazette dated **10 March 2018** and numbered **30356**, we, **Bulls Yatırım Menkul Değerler A.Ş.** (the **"Company"**), acting in our capacity as the data controller and having our registered address at **Esentepe Mah., Büyükdere Cad., Levent Plaza No: 173, Block 1B, Floor: 5, 34394 Şişli/Istanbul, Türkiye**, aim to inform you about the processing of your personal data through this Privacy Notice.

1. INFORMATION ON THE DATA CONTROLLER

Company: Bulls Yatırım Menkul Değerler A.Ş.

Address: Head Office Address: Büyükdere Cad. No: 173, Levent Plaza B Block, Floor: 5, Levent / Istanbul, Türkiye

Telephone: +90 (212) 410 05 00

Fax: +90 (212) 410 05 05

E-mail: kvkk@bullsyatirim.com

Registered Electronic Mail (KEP) Address: bullsyatirim@hs03.kep.tr

2. PERSONAL DATA PROCESSED

Within the scope of your relationship with the Company, the following categories of your personal data are processed:

- **Identity:** Name and Surname, Turkish Identification Number, Tax Identification Number, Mother's Name, Father's Name, Place of Birth, Date of Birth, Type of Identity Document, Identity Document Number, Nationality, Marital Status, Documents Containing Information Such as Gender (e.g. Driver's License, Copy of Identity Card), Signature/Initial Information.
- **Contact:** E-mail Address (including internal extension number and corporate e-mail address), Telephone Number, Fax Number, Address, City and District.
- **Professional Information:** Profession, Name of Employer, Industry of Employment.
- **Legal Transaction:** Personal data processed for the determination, follow-up and enforcement of legal receivables, rights and obligations, as well as for compliance with legal obligations and our Company policies, including file and debt information relating to enforcement proceedings (including information contained in documents such as court and administrative authority decisions).

- **Customer Transaction:** Purpose of Opening an Account with the Company, Voice Recordings of Conversations with the Customer Representative, Invoice, Promissory Note, Cheque Information, Your Transaction Requests, Account Information.
- **Transaction Security:** IP Address Information, Website/Mobile Application Login-Logout and Transaction Information, Password and Passcode Information.
- **Financial Information:** Monthly Net Income, Money Transfer Information, Source of Assets, Whether Funds Will Be Transferred to the Account from Abroad, Countries from Which Funds May Be Transferred to the Account, Credit Score, Investor Risk Assessment, Asset Information, Investment Portfolio Information, Type of Capital, Account Status, Shareholding Percentage, Annual Interest Rate, Bank Code, Credit Information, Debt Information.
- **Marketing:** Responses to Surveys, Website and Mobile Application Cookie Records.
- **Visual and Audio Records:** Photograph (obtained through a copy of the Identity Document), Camera Recordings (excluding recordings falling within the scope of Physical Premises Security Information), Voice Recordings (telephone call recordings).
- **Other:** Document Number, Account Type, Member Code, Date of Access, **PTT** Barcode Number, CRM Status, Delivery Date, Statement Delivery Method.
- **Other (For Foreign Nationals):** Purpose of Stay in Türkiye, Duration of Residence in Türkiye, Planned Duration of Stay in Türkiye.

3. PURPOSES OF PROCESSING PERSONAL DATA

Your personal data obtained within the scope of your relationship with the Company are processed for the following purposes:

- Opening an account with the **Central Securities Depository of Türkiye (Merkezi Kayıt Kuruluşu – MKK)**;
- Opening an account with **Takasbank (Istanbul Settlement and Custody Bank Inc.)**;
- Sending account statements;
- Creating and updating accounts maintained with our Company;
- Conducting restricted customer procedures;
- Conducting dispute resolution, internal audit and inquiry processes;
- Managing customer complaint processes;
- Conducting internal control processes;
- Conducting investigation processes;
- Preparing and reporting suspicious/erroneous transaction reports;

➤ Managing defence submissions before the **Capital Markets Board of Türkiye (CMB) (Sermaye Piyasası Kurulu – SPK)**;

➤ Conducting risk monitoring processes;

➤ Conducting information security processes;

➤ Following up legal processes and carrying out legal transactions;

➤ Making and following up tax notifications;

➤ Preparing customers' net worth reports;

➤ Submitting annual tax residency notifications to the **Ministry of Treasury and Finance**;

➤ Conducting declaration processes before the **Financial Crimes Investigation Board (MASAK)**.

➤ Recording customer information in the system and carrying out account opening/closing procedures;

➤ Conducting customer collateral completion processes;

➤ Carrying out cash withdrawal transactions;

➤ Preparing Customer Stop-Out Reports;

➤ Conducting treasury processes within the scope of customer transactions;

➤ Conducting release and reconciliation processes;

➤ Retaining customer support records;

➤ Carrying out archiving activities;

➤ Reporting agreements;

➤ Retaining customer transaction records;

➤ Performing address verification;

➤ Updating customer contact information;

➤ Conducting power of attorney procedures;

➤ Carrying out transfer (virman) instructions;

➤ Conducting cash transactions relating to **VIOP (Turkish Derivatives Market)** accounts;

➤ Maintaining account statement dispatch reports;

- Preparing and submitting the information form of the **Turkish Capital Markets Association (TCMA) (Türkiye Sermaye Piyasaları Birliği – TSPB)**;
- Maintaining internal company records;
- Conducting litigation and enforcement proceedings;
- Conducting blacklist processes.

4. TRANSFER OF PROCESSED PERSONAL DATA

Your personal data may be transferred, to the extent required by the purposes set out in Article 2 of this Privacy Notice and in accordance with the provisions of the **Law No. 6698 on the Protection of Personal Data (KVKK)** governing the transfer of personal data, to authorized public institutions and organizations in Türkiye, our business partners, our suppliers and their authorized representatives, and to our business partners, affiliates and subsidiaries located abroad, as well as to our suppliers and third parties.

5. METHODS OF COLLECTING PERSONAL DATA AND LEGAL GROUNDS

Your personal data are collected from you, third parties and legal authorities during the establishment of your legal relationship with our Company and throughout the continuation of such relationship, through the website, mobile applications, e-mail, telephone, application forms and similar means, as well as through written or verbal communication channels established with our Company, in verbal, written or electronic form.

The personal data collected in this manner are processed based on the legal grounds set out in Articles **5, 8 and 9** of the **Law No. 6698 on the Protection of Personal Data (KVKK)** and specified below.

- Your explicit consent has been obtained;
- The processing is expressly provided for by the legislation to which our Company is subject, particularly the Turkish Commercial Code;
- The processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of the contract;
- The processing is necessary for the fulfilment of a legal obligation;
- The processing is necessary for the establishment, exercise or protection of a legal right;
- The processing is necessary for the legitimate interests of the data controller, provided that it does not prejudice the fundamental rights and freedoms of the data subject.

6. RIGHTS OF THE DATA SUBJECT WHOSE PERSONAL DATA ARE PROCESSED

Pursuant to Article 11 of the **Law No. 6698 on the Protection of Personal Data (KVKK)**, you have the following rights regarding your personal data:

- To learn whether your personal data are being processed;
- To request information if your personal data have been processed;
- To learn the purpose of the processing of your personal data and whether they are used in accordance with such purpose;
- To learn the third parties to whom your personal data have been transferred, whether domestically or abroad;
- To request the rectification of your personal data if they are incomplete or inaccurately processed;
- To request the erasure or destruction of your personal data;
- To request that the rectification, erasure or destruction of your personal data be notified to the third parties to whom your personal data have been transferred;
- To object to any result against you arising exclusively from the analysis of your personal data through automated systems;
- To request compensation for any damages you suffer due to the unlawful processing of your personal data.

7. HOW TO CONTACT US REGARDING YOUR RIGHTS AND REQUESTS

Pursuant to Article 11 of the **Law No. 6698 on the Protection of Personal Data (KVKK)**, you may submit your requests regarding your statutory rights relating to your personal data by delivering, in person, a petition prepared in accordance with the conditions set out in the **Communiqué on the Principles and Procedures for the Application to the Data Controller**, to our address at **Esentepe Mah., Büyükdere Cad., Levent Plaza No: 173, Block 1B, Floor: 5, 34394 Şişli/İstanbul, Türkiye**, following identity verification, or by sending it through a notary public.

Alternatively, you may submit your request to our **Registered Electronic Mail (KEP)** address **bullsyatirim@hs03.kep.tr**, by using a secure electronic signature or mobile signature, or from the electronic mail address previously notified to and verified by our Company, by sending it to kvkk@bullsyatirim.com.