

BULLS YATIRIM MENKUL DEĞERLER A.Ş.
PERSONAL DATA PROTECTION & PRIVACY
POLICY

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A. SCOPE

This **Personal Data Protection and Privacy Policy (the "Policy")** applies to all units, departments and employees of **Bulls Yatırım Menkul Değerler A.Ş. ("Bulls" or the "Company")**. This Policy has been prepared to provide the necessary information by setting out the rules governing the processing of personal data and entered into force on **18 June 2025** upon approval by the management of Bulls.

B. DEFINITIONS

Explicit Consent: Consent that is given freely, based on adequate information, and relating to a specific subject.

Anonymization: The process of rendering personal data incapable of being associated with an identified or identifiable natural person under any circumstances, even by matching such data with other data.

Data Subject: The natural person whose personal data are processed.

Personal Data: Any information relating to an identified or identifiable natural person. This includes any information that contains concrete content regarding a person's physical, economic, cultural, social or psychological identity, or that enables the identification of the person by being associated with any record, such as an identity number, tax identification number or insurance number.

Processing of Personal Data: Any operation performed on personal data, whether wholly or partly by automated means or by non-automated means provided that the data form part of a data recording system, including collection, recording, storage, preservation, modification, reorganization, disclosure, transfer, acquisition, making available, classification or prevention of use. All operations performed on personal data, starting from the initial collection of the data, fall within the scope of the processing of personal data.

Board: Personal Data Protection Board.

Authority: Personal Data Protection Authority.

KVKK: Law No. 6698 on the Protection of Personal Data, dated 24 March 2016 and published in the Official Gazette No. 29677 dated 7 April 2016.

Special Categories of Personal Data: Personal data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Policy: Personal Data Protection and Privacy Policy.

Data Processor: A natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.

Data Recording System: A recording system in which personal data are processed by being structured according to specific criteria.

Data Controller: A 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.

C. REFERENCES

Law on the Protection of Personal Data (KVKK): The subject matter of this Policy is the **Law No. 6698 on the Protection of Personal Data**, dated **24 March 2016** and published in the **Official Gazette No. 29677 dated 7 April 2016**.

Regulation on the Erasure, Destruction or Anonymization of Personal Data: The Regulation published by the Personal Data Protection Authority in the **Official Gazette No. 30224 dated 28 October 2017**, which sets out the provisions governing the erasure, destruction and anonymization of personal data.

Communiqué on the Procedures and Principles of Application to the Data Controller: The Communiqué published by the Personal Data Protection Authority in the **Official Gazette No. 30356 dated 10 March 2018**, which regulates the procedures and principles governing applications made by data subjects to data controllers.

Communiqué on the Procedures and Principles to Be Followed in Fulfilling the Obligation to Inform: The Communiqué published by the Personal Data Protection Authority in the **Official Gazette No. 30356 dated 10 March 2018**, which regulates the procedures and principles governing the obligation of data controllers to provide information to data subjects.

D. AMENDMENTS

In the event that additional legislation within the scope of the KVKK enters into force or amendments are made to this Policy from time to time, such amendments may be followed on the Company's corporate website. The most up-to-date version of this Policy is also available on the Company's corporate website.

1. PURPOSE

Bulls Yatırım Menkul Değerler A.Ş. (hereinafter referred to in this Policy as "**Bulls**" or the "**Company**"), acting on its own behalf or as the authorized representative of another company or organization, attaches great importance to the protection of the personal data of its customers, shareholders, business partners, employees, job applicants, individuals who visit its websites or contact the Company through other means of communication, and all other natural persons who share their personal data with the Company.

Within the framework of the **Law No. 6698 on the Protection of Personal Data ("KVKK")**, the Company, in its capacity as a data controller, hereby informs the public of the rules and policies it has adopted regarding the processing of personal data and the use of cookies and

similar technologies through this **Personal Data Protection and Privacy Policy** (the "**Policy**"), the details of which are set out below.

The purpose of this Policy is to provide information to data subjects regarding the Company's personal data processing activities and the systems used for such activities, thereby ensuring transparency in relation to the processing of personal data.

Accordingly, this Policy explains, within the scope of the KVKK, the principles governing the processing of personal data, the categories of data subjects whose personal data are processed, the rights of such data subjects, and the Company's practices regarding the use of cookies and similar technologies.

2. PERSONAL DATA

2.1. What is Personal Data?

Personal Data means any information relating to an identified or identifiable natural person. (Article 3(1)(d) of the KVKK)

2.2. Information and Documents That Do Not Constitute Personal Data

For the purposes of this Policy, **anonymous information, anonymized information, and other data that cannot be associated with an identified or identifiable natural person** shall not be regarded as personal data.

2.3. General Principles Governing the Processing of Personal Data

Within the scope of Article 4, paragraph 2 of the KVKK and for the purposes exemplified under **Section 2.8 – Purposes of Processing Personal Data** of this Policy, the Company processes personal data in accordance with the following principles:

- **Processing personal data lawfully and in good faith;**
- **Ensuring that personal data are accurate and, where necessary, kept up to date;**
- **Processing personal data for specified, explicit and legitimate purposes;**
- **Processing personal data in a manner that is relevant, limited and proportionate to the purposes for which they are processed;**
- **Retaining personal data for the period prescribed by the applicable legislation or required for the purpose for which they are processed.**

2.4. Conditions for Processing Personal Data

As a general rule, Bulls does not process personal data without the explicit consent of the data subject. However, personal data may be processed without obtaining the explicit consent of the data subject where one of the following legal grounds exists: where expressly provided for by law; where it is necessary to protect the life or physical integrity of a person who is unable to express his or her consent due to actual impossibility or whose consent is not legally valid; where the processing of personal data of the parties to a contract is necessary, provided that it

is directly related to the establishment or performance of the contract; where it is necessary for the data controller to fulfil its legal obligations; where the personal data have been made public by the data subject; where data processing is necessary for the establishment, exercise or protection of a legal claim; or where data processing is necessary for the legitimate interests of the data controller, provided that such processing does not prejudice the fundamental rights and freedoms of the data subject. (Article 5(2)(a), (b), (c), (ç), (d), (e) and (f) of the KVKK)

2.5. Personal Data Processed by Bulls

Personal data are processed by Bulls either on the basis of the explicit consent of the data subject or, where permitted under Articles 5 and 6 of the KVKK, without explicit consent for activities that may lawfully be carried out without such consent. Such personal data are processed within the scope of the purposes exemplified under **Section 2.8 – Purposes of Processing Personal Data** of this Policy.

The categories of personal data processed vary depending on the nature of the relationship between the Company and the data subject, the communication channels used, and the relevant purpose of processing.

The categories of personal data listed below are provided by way of example and may be processed by Bulls in accordance with the principles set out in this Policy. The categories of personal data processed may vary depending on various factors, including the nature of the relationship between the data subject and Bulls, the communication channels used, and, where applicable, the data subject's guardian, legal representative or attorney whose information has been notified to and recorded by the Company.

- Name, surname, profession, title, employer/company information, educational background, employment history, gender, marital status, nationality, tax status, criminal record or civil registry information identifying the data subject, and where applicable, data of the same nature relating to the data subject's guardian, custodian or attorney.
- Date of birth, place of birth, identity number, blood type, marital status, religion and photograph contained in documents used for personal identification and identity verification, such as identity cards, passports and driver's licenses.
- Contact information such as home, business or temporary residence address, e-mail address, telephone and fax number; and other personal data contained in documents and invoices accepted as proof of address.
- Data relating to investment objectives, risk and return preferences, knowledge and experience regarding capital markets, the amount of savings allocated or to be allocated to capital market transactions, products and services determined to be suitable for the data subject, investment and ancillary services used by the data subject, domestic and international markets in which transactions are carried out, financial instruments traded, transaction frequency and volume, investment institutions, correspondent banks, and other data reflecting detailed financial preferences and tendencies.

- Communication records, such as face-to-face meetings and telephone conversations with Bulls, correspondence conducted in writing or via electronic mail, and other audio and visual data.
- Internet Protocol (IP) address of the devices used, device identification, unique identifier information, device type, advertising identifier, unique device signature, statistics relating to webpage visits, incoming and outgoing traffic information, referring URLs, internet log information, location information, websites visited, all electronic traces left on our websites, and all information relating to transactions and activities carried out through our other platforms, internet infrastructure, advertisements and electronic mail content. 📡 **Technical and electronic usage data**, including Internet Protocol (IP) address, device identification, unique identifier information, browser type, unique device identifier, internet page access statistics, incoming and outgoing traffic data, referring URLs, internet log information, location data, websites visited, all electronic traces left on our websites, and all information relating to transactions and activities carried out through our platforms, internet infrastructure, advertisements and electronic mail content.

2.6. What Are Special Categories of Personal Data?

Personal data relating to individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, constitute special categories of personal data. (Article 6(1) of the KVKK)

2.7. Conditions for Processing Special Categories of Personal Data

Bulls does not process special categories of personal data without the explicit consent of the data subject. However, such data may be processed where:

- b)** it is expressly provided for by law;
- c)** it is necessary for the protection of the life or physical integrity of a person who is unable to express his or her consent due to actual impossibility or whose consent is not legally valid;
- ç)** it relates to personal data that have been made public by the data subject and is consistent with the data subject's intention to make such data public;
- d)** it is necessary for the establishment, exercise or protection of a legal claim;
- e)** it is necessary for the protection of public health, preventive medicine, medical diagnosis, the provision of treatment and care services, or the planning, management and financing of healthcare services by persons under an obligation of confidentiality or authorized institutions and organizations;
- f)** it is necessary for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance;

g) it is processed by foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes, provided that it complies with the legislation and their purposes, is limited to their fields of activity, is not disclosed to third parties, and relates to their current or former members or persons who are in regular contact with such organizations or formations, **subject to the condition that adequate measures determined by the Board are taken**, without requiring the explicit consent of the data subject.

2.8. Purposes of Processing Personal Data

Personal data may be processed by Bulls for the following purposes and may be retained for the period prescribed by such purposes and the applicable legislation:

- Fulfilling the legal and administrative obligations of Bulls;
- Negotiating, establishing and performing executed or contemplated agreements;
- Determining products, services and platforms suitable for investors, customizing and improving them, and providing effective customer service;
- Ensuring and improving coordination, cooperation and efficiency within and among the departments of Bulls;
- Ensuring the security of the websites, other electronic systems and physical environments owned by or used by Bulls;
- Notifying changes in the applicable legislation or in the rules and policies adopted by Bulls, and making other notifications concerning the data subject;
- Promoting and marketing Bulls and the products and services of Bulls, improving such products and services, and obtaining the opinions of the data subject through surveys and polls;
- Celebrating birthdays, including the data subject in prize draws or competitions, providing gifts, and promoting and conducting other similar events, promotions and campaigns for the benefit of the data subject;
- Investigating, identifying and preventing breaches of agreements and violations of law, and reporting such matters to the relevant administrative or judicial authorities;
- Resolving existing and future legal disputes.
- Carrying out corporate and partnership law transactions;
- Determining, meeting, conducting, developing and improving Bulls' staffing requirements and recruitment processes within the framework of Bulls' human resources policies;
- Evaluating and finalizing job applications and communicating with job applicants;
- Developing and improving Bulls' sales, marketing, advertising, corporate communications, human resources and public relations policies;
- Where the processing of personal data is necessary for the establishment, exercise or protection of a legal claim;

- Ensuring, maintaining and protecting the lawful and legitimate interests of Bulls, provided that such processing does not prejudice the fundamental rights and freedoms of the data subject;
- Responding to the requests and inquiries of the data subject.

2.9. Transfer of Personal Data Within Türkiye and Abroad

As Bulls, provided that we comply with the general principles set forth in **Article 4 of the KVKK**, the conditions stipulated in **Articles 8 and 9** thereof, and take the necessary security measures, we may transfer personal data to third parties within Türkiye and abroad for the purposes set out under the heading "**Purposes of Processing Personal Data**" of this Policy, and may process and store such personal data on servers or in other electronic environments located within Türkiye or abroad.

Furthermore, upon the customer's request, within the scope of intermediary services for trading transactions in foreign markets, we may transfer your personal data abroad pursuant to your **Explicit Consent Declaration** set out in **Annex-2**, in accordance with the procedures and principles regarding the transfer of personal data abroad under **Article 9 of the Law No. 6698 on the Protection of Personal Data**, since we are required to comply with the capital markets, financial markets and tax legislation of the countries where the relevant exchanges are located and where the foreign institutions with which we cooperate operate, and/or with the directives of the relevant legislation and/or regulatory authorities.

Although the third parties to whom personal data may be transferred may vary depending on factors such as the type and nature of the relationship between the data subject and Bulls and the markets in which transactions are carried out, they generally include the following:

- a. Companies within the Group to which Bulls is affiliated;
- b. The Capital Markets Board, Borsa İstanbul, Takasbank, the Central Securities Depository, and other domestic and foreign regulatory authorities, stock exchanges, central clearing and settlement institutions, central counterparties, and third parties authorized by such institutions and organizations;
- c. Investment institutions, custodians, platform providers, market data providers, infrastructure providers, other business partners, suppliers and subcontractors with which Bulls operates within Türkiye and abroad;
- d. Third parties involved in transactions relating to the restructuring of Bulls or the Group, or where Bulls is subject to merger, demerger or change of control transactions.

2.10. Collection of Personal Data

For the purposes exemplified under the "**Purposes of Processing Personal Data**" section of this Policy and within the framework of the conditions set forth in **Articles 5 and 6 of the KVKK**, the Company may collect personal data directly from employees, customers,

suppliers, business partners, group companies, the call center, public authorities and other physical environments, as well as through websites, mobile applications, social media and other public channels, or through training sessions, organizations and similar events.

2.11. Retention Period of Personal Data

Except where a longer retention period is required or permitted by law, Bulls retains personal data only for the period necessary to achieve the purposes specified in this Policy. Upon the expiry of the applicable retention period, personal data shall be erased, destroyed or anonymized by Bulls in accordance with **Article 7 of the KVKK** and the **Regulation on the Procedures and Principles Regarding the Erasure, Destruction or Anonymization of Personal Data**.

PROCESS	RETENTION PERIOD	DESTRUCTION PERIOD
Company operations	10 years	During the first periodic destruction period following the expiry of the retention period
Preparation of agreements	10 years following the termination of the agreement	During the first periodic destruction period following the expiry of the retention period
Performance of the Company's communication activities	10 years following the completion of the activity	During the first periodic destruction period following the expiry of the retention period
Conducting human resources processes	10 years following the completion of the activity	During the first periodic destruction period following the expiry of the retention period
Log recording and monitoring systems	10 years	During the first periodic destruction period following the expiry of the retention period
Conducting hardware and software access processes	2 years	During the first periodic destruction period following the expiry of the retention period
Participant registration and camera recordings following visitor and meeting activities	2 years following the completion of the activity	During the first periodic destruction period following the expiry of the retention period

2.12. Rights of the Data Subject within the Scope of the KVKK

Pursuant to **Article 11 of the KVKK**, the rights of natural persons whose personal data are processed, defined as the "**data subject**," are regulated. In accordance with the said Article, the data subjects have the following rights with respect to VSY:

- To learn whether their personal data are processed by VSY;
- To request information if their personal data have been processed;
- To learn the purpose of processing their personal data and whether such data are used in accordance with that purpose;
- To know the third parties to whom their personal data are transferred within Türkiye or abroad;
- To request the rectification of their personal data if they have been processed incompletely or inaccurately;
- To request the erasure or destruction of their personal data where the reasons requiring the processing of such personal data no longer exist;
- To request that the rectification and erasure operations be notified to the third parties to whom the personal data have been transferred;
- To object to a result adverse to the data subject arising from the analysis of the processed data exclusively through automated systems;
- To request compensation for damages in the event that they suffer damage due to the unlawful processing of their personal data.

Requests submitted by data subjects for the exercise of any of the above rights shall be responded to by the Company within **30 days** at the latest. Such requests may be submitted by hand together with identity verification documents to **Bulls Yatırım Menkul Değerler A.Ş., Esentepe Mah., Büyükdere Cad. Levent Plaza No:173, B Block, Floor: 5, 34394 Şişli/İstanbul**, sent to the same address through a notary public, or transmitted electronically with a secure electronic signature to bullsyatirim@hs03.kep.tr.

Where responding to such requests requires additional costs, the Company may charge a fee in the amounts prescribed under the applicable legislation.

2.13. Security of Personal Data

Within the framework of **Article 12 of the KVKK**, Bulls, in its capacity as the data controller, takes the necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of personal data, prevent unlawful access to personal data, and ensure the safeguarding of personal data. For this purpose, Bulls:

- a. aims to ensure that its business processes, services and activities are carried out in accordance with the policies and rules established for the protection of personal data;
- b. conducts training and awareness activities for its employees regarding the KVKK, the applicable legislation, and the internal policies and rules prepared within this framework;

c. obtains the necessary declarations and undertakings from its employees, persons and organizations processing personal data on behalf of Bulls, business partners, and requires that such declarations and undertakings be subject to specific sanctions in order to prevent any violations;

d. takes the necessary information security measures in accordance with the KVKK to ensure the security of personal data within and outside the Company and to prevent unauthorized access to personal data;

e. periodically audits compliance with the policies and rules established for the protection of personal data within the framework of the KVKK, and regularly reports the results to the Board of Directors for monitoring;

f. periodically reviews the adequacy of all measures taken within the framework of the KVKK and aims to improve its existing data security system by benefiting from internal and external developments.

3. COOKIES AND SIMILAR TECHNOLOGIES

3.1. General

Small data files sent by the web server to users' devices through the internet browser in use are called **cookies**. Websites recognize users through cookies, and the lifespan of cookies varies depending on the browser settings.

While these cookies are created through the systems managed by the Company, certain service providers authorized by the Company may also place similar technologies on users' devices and obtain IP address, unique identifier and device identifier information. In addition, although links to third-party websites available on the Company's systems are subject to the privacy policies of such third parties, the Company is not responsible for their privacy practices. Accordingly, when visiting a website through such links, it is recommended that the privacy policy of the relevant website be read.

3.2. Types of Cookies

Cookies, the primary purpose of which is to provide convenience to users, are basically classified into four main categories:

i. Session Cookies: These are cookies that enable various features, such as transferring information between web pages and systematically remembering the information entered by the user, and are necessary for the proper functioning of the Company's website features.

ii. Performance Cookies: These are cookies that collect information regarding the frequency of visits to webpages, possible error messages, the total time users spend on the relevant page, and website usage patterns, and are used to improve the performance of the Company's website.

iii. Functional Cookies: These are cookies that remember previously selected preferences in order to provide convenience to users and are intended to provide users with enhanced website features within the Company's website.

iv. Advertising and Third-Party Cookies: These are cookies belonging to third-party providers and enable the use of certain functions on the Company's website and the monitoring of advertisements.

3.3. Purposes of Using Cookies

The purposes for which the Company uses cookies are as follows:

i. Operational purposes: The Company may use cookies that enable the use of functions on this website or detect irregular behavior in order to ensure the administration and security of the Company's systems.

ii. Functional purposes: The Company may use cookies that remember users' information and previous preferences in order to facilitate the use of its systems and provide user-specific features.

iii. Performance purposes: The Company may use cookies that evaluate and analyze users' interaction with the messages sent and user behavior in order to measure and improve the performance of its systems.

iv. Advertising purposes: The Company may use cookies that measure the effectiveness of advertisements or analyze click-through rates in order to deliver advertisements and similar content to users based on their interests through systems belonging to the Company or third parties.

3.4. Disabling Cookies

The use of cookies is enabled by default in most browsers. Users may change this setting through their browser settings and, accordingly, delete existing cookies and refuse the use of future cookies. However, if the use of cookies is disabled, certain features of the Company's systems may not function properly.

The method for changing cookie preferences varies depending on the type of browser used and may be obtained from the relevant service provider at any time.

3.5. Activities of Service Providers

Bulls may receive support from service providers authorized by it for the operation and promotion of its websites, platforms, applications and services. These service providers may place cookies and similar technologies (third-party cookies) on users' devices and may collect information such as IP address, unique identifier and device identifier for the purpose of identifying users' devices.

3.6. Third-Party Websites, Products and Services Available on Our Website

Bulls' websites, platforms and applications may contain links to websites belonging to third parties and other organizations, as well as to the products and services available on such websites. The inclusion of such links on our websites does not mean that Bulls assumes any responsibility for the privacy practices of such third parties.

Although links to third parties that do not belong to our Company are available on Bulls' websites, such third parties and the links to their websites are subject to the privacy policies of the relevant third parties. Therefore, where the websites accessed through such links are visited, we recommend reviewing the privacy policies of those websites.

4. EFFECTIVENESS AND UPDATES

This Policy shall enter into force on the date it is approved by the Company's Board of Directors. Any amendments to the Policy shall enter into force upon the approval of the

Company's General Manager. The Policy shall ordinarily be reviewed and updated once a year. However, in the event of legislative amendments, changes in the technical standards referenced herein, decisions and/or practices of the Personal Data Protection Board, or court decisions, the Company reserves the right to review this Policy and, where necessary, update, amend, repeal and replace it with a new policy. The authority to decide on the repeal of this Policy rests with the Company's Board of Directors.

Where deemed necessary, amendments may be made to this Personal Data Protection and Privacy Policy, and the current version of the Policy will be available on Bulls' website at <https://bullsyatirim.com/>. Such amendments shall become effective as of the date they are published on the Bulls website. Where deemed necessary, Bulls may also notify such amendments through other methods it considers appropriate.