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**AK**Portföy

**Personal Data  
Protection  
and  
Privacy Policy**

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## 1. SCOPE

This Policy, titled "Personal Data Protection and Privacy Policy", has been prepared in order to provide the necessary information by explaining the whole set of rules for the processing of personal data and has been approved by the management of Ak Portföy Yönetimi Anonim Şirketi ("Company") and entered into force on 23.05.2019.

## 2. DEFINITIONS

<b>Personal Data:</b>	Any information that is personally recognizable or identifiable and covers all circumstances where the data include a tangible content expressing the physical, economic, cultural, social or psychological identity of a person or where the data are correlated with any registration such as identity, tax and insurance numbers.
<b>Private Personal Data:</b>	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data.
<b>Explicit Consent:</b>	Informed and freely given consent about a specific issue.
<b>Anonymization:</b>	Rendering personal data impossible to link with an identified or identifiable natural person, even by matching them with other data.
<b>Processing of Personal Data:</b>	All kinds of processes on data, such as obtaining personal data with fully or partially automated or (on condition of being part of a data recording system) non-automated methods, and recording, storing, keeping, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of the same. This includes all types of processing performed on the data, starting from the initial acquisition of the data.
<b>Personal Data Subject:</b>	Natural person whose personal data is processed.
<b>Data Recording System:</b>	Recording system where personal data is structured and processed based on certain criteria
<b>Data Controller:</b>	The natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system.
<b>Data Processor:</b>	The natural or legal person who processes personal data on behalf of the controller upon his authorization.
<b>PDPL:</b>	Personal Data Protection Law no. 6698 dated 24 March 2016, published on the Official Gazette no. 29677 dated 7 April 2016.
<b>Board:</b>	Personal Data Protection Board
<b>Authority:</b>	Personal Data Protection Authority
<b>Policy:</b>	Insurance Joint Stock Company Personal Data Protection and Privacy Policy
<b>Company:</b>	Ak Portföy Yönetimi A.Ş. (Ak Asset Management)

### 3. REFERENCES

**Personal Data Protection Law (“PDPL”):** It is the law subject to this policy, which is Law No. 6698 dated March 24, 2016 and published in the Official Gazette dated April 7, 2016 and numbered 29677.

### 4. AMENDMENTS

Amendments to be made to this Policy with the entry into force of additional legislation within the scope of PDPL or at various times can be followed on the Company's corporate website, and the current version of this Policy can also be accessed from this corporate website.

### 5. PURPOSE

The Company legally processes the personal data of its employees, visitors and other natural persons who establish a relationship with the Company by applying for a job or through any other purpose or via any other channel in order to provide market opinions and information to the portfolios of a certain size of persons and institutions that trade intensively in the Turkish capital markets, to realize the purchase and sale of capital market instruments and to manage their portfolios.

The purpose of this policy is to inform the relevant persons by explaining these processing activities and personally relevant systems carried out by the Company and thus to provide transparency regarding personal data.

In this context, the Company has explained the processing of personal data within the scope of PDPL, the data subjects who are involved in this processing and their rights in detail in this Policy together with the use of cookies and similar technologies.

### 6. PRINCIPLES OF PERSONAL DATA PROCESSING

#### 6.1. General Principles Regarding Personal Data Processing

The Company processes personal data in compliance with the Article 4, paragraph 2 of the PDPL and the purposes exemplified in the “Purposes of Processing Personal Data” section of this Policy, in accordance with the following principles:

- Lawfulness and conformity with rules of bona fides
- Accuracy and being up to date, where necessary
- Being processed for specific, explicit and legitimate purposes
- Being relevant with, limited to and proportionate to the purposes for which they are processed
- Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed

#### 6.2. Personal Data Processed by the Company

Personal data are processed within the Company through the explicit consent obtained from the data subjects or in the light of the activities that can be carried out without explicit consent in accordance with Articles 5 and 6 of the KVKK, and these data are processed only within the framework of the purposes exemplified in the “Purposes of Processing Personal Data” section of this policy. These types of personal data, which diversify and differentiate depending on the type and nature of the relationship between the Company and the data subject, the communication channels used and the purpose information mentioned, and which are processed in accordance with the principles in this policy, are as follows:

- Information identifying the data subject such as name, surname, occupation, title, employment information, educational status, gender, marital status, spouse/children information, citizenship status, military service information, criminal record information, tax liability status,
- Data such as date of birth, place of birth, identification number, blood group, religion and photographs contained in identification documents such as photocopy of identity card, copy of identity card, passport and driver's license,
- Contact information such as address, e-mail, telephone and fax numbers, as well as communication records and other voice data within the scope of telephone calls and e-mail correspondence,
- Real person information in documents for legal entities,
- Descriptive and Company-generated qualitative information about candidates and employees,
- Real person information in documents for legal entities such as tax certificates, trade gazette, authorization certificates, qualification certificates, signature circulars and activity certificates,
- Detailed financial data on pricing, settlement, collection and payment activities.

The above-mentioned data types are also defined in Ak Asset Management's personal data inventory and in the Data Controllers Registry Information System (VERBIS) system belonging to the Personal Data Protection Authority.

### **6.3. Purposes of Processing Personal Data**

Personal data may be processed by the Company within the scope of the following purposes and may be stored for as long as stipulated by these purposes and the relevant legal periods:

- Determination of the Company's commercial and business strategies, carrying out the necessary work by the business units to ensure that customers benefit from the following products and services offered by the Company,
  - Real estate investment, venture capital and equity fund transactions,
  - Account opening / Portfolio management,
  - Investment processes,
  - Stock exchange transactions,
  - Foreign exchange, Eurobond and derivative instrument transactions,
  - Contacting intermediary institutions for products and services,
  - Transactions under the Capital Markets Board,
- Planning and execution of the corporate sustainability activities,
- Supporting Akbank T.A.Ş. Group companies in the realization of corporate and partnership law transactions,
- Ensuring the legal and commercial security of the Company and the persons who are engaged in business relations with the Company,
- Conducting marketing and analysis activities with the explicit consent of customers and potential customers,
- Conducting activities (surveys, product suggestions, special days / greetings) with the explicit consent to ensure customer satisfaction,
- Conducting candidate evaluation and recruitment processes with the explicit consent of employee candidates in the Company's recruitment processes,

The above-mentioned data processing purposes are also defined in Ak Asset Management's personal data inventory and in the Data Controllers Registry Information System (VERBIS) system belonging to the Personal Data Protection Authority.

#### 6.4. Transfer of Personal Data

Within the framework of the purposes exemplified in the “**Purposes of Processing Personal Data**” section of this Policy and in accordance with Articles 8 and 9 of the PDPL, the Company transfers data domestically and internationally and personal data can be processed and stored on servers and electronic media used within this scope. The nature of these transfers and the parties to whom such transfers are made vary depending on the type and nature of the relationship between the data subject and the Company, the purpose of the transfer and the relevant legal basis, and these parties are generally as follows:

- Domestic and foreign third parties that provide services,
- Direct and indirect shareholders, subsidiaries, affiliates,
- Persons and institutions that provide services and/or consultancy,
- Business partners with whom contracts are signed

#### 6.5. Collection of Personal Data

In order to meet the purposes exemplified in the “**Purposes of Processing Personal Data**” section of this Policy, the Company may collect personal data directly from employees and customers, suppliers, business partners, group companies, official institutions, call centers and other physical environments within the framework of the conditions stipulated in Articles 5 and 6 of the PDPL, as well as personal data through websites, mobile applications, social media and other public channels or trainings held, activities and other similar events.

#### 6.6. Retention Duration of Personal Data

Personal data are retained within the Company for the duration of the relevant legal retention periods and are stored in the Company's virtual or physical environments in accordance with the Company's data retention and destruction policy for the realization of the activities related to this data and the purposes specified in this Policy. These legal periods are maintained by the relevant units for up to 10 years depending on the category of the data defined in the Company's personal data inventory.

Personal Data Category	Retention Period
<b>Identity</b>	10 Years
<b>Contact</b>	10 Years
<b>Location</b>	10 Years
<b>Personnel</b>	10 Years
<b>Legal Transaction</b>	10 Years
<b>Customer Transaction</b>	10 Years
<b>Risk Management</b>	10 Years
<b>Finance</b>	10 Years
<b>Professional Experience</b>	10 Years
<b>Audio and Visual Recordings</b>	10 Years
<b>Vehicle License Plate Information</b>	10 Years
<b>Family and Relatives Information</b>	10 Years

The situations specified in the Regulation for the termination of the personal data retention conditions are as follows:

- a) Amendment or repeal of the provisions of the relevant legislation that constitute the basis for processing personal data;
- b) The fact that the contract between the parties has never been established, the contract is invalid, the contract is automatically expired, the contract is terminated or the contract is revoked,
- c) The purpose requiring the processing of personal data is no longer applicable,
- d) Processing of personal data is contrary to the law or good faith,
- e) Revocation of the consent of the data subject in cases where the processing of personal data is carried out only with the explicit consent requirement,
- f) The acceptance by the Company of the procedural application made by the data subject regarding the personal data processing activity within the framework of the rights in paragraphs (e) and (f) of Article 11 of the Law,
- g) In cases where the Company rejects the application made by the person concerned with the request for the disposal of his/her personal data, the response is found insufficient or does not provide a response within the period stipulated in the Law; a complaint is made to the Board and this request is approved by the Board,
- h) The absence of any condition that would justify keeping personal data for a longer period of time after the maximum period required for the retention of personal data has elapsed.

Personal data for which the purpose of use has ended and the legal retention period has expired will be erased, destroyed or anonymized by the Company in accordance with Article 7 of the PDPL. A written decision will be made by the relevant business units, the owners of the information systems and applications containing the personal data in question, the PDPL Working Group and all persons/departments that may be related to the subject, based on the method for the disposal of personal data and the reasons for the disposal described above. In addition to periodic disposal procedures, the disposal procedures for personal data that are determined to be disposed of upon the application made by the person are completed within 30 days.

### **6.7. Rights of the Data Subject within the Framework of PDPL**

Article 11 of the PDPL regulates the rights of real persons whose personal data are processed and the data subjects have the following rights over the Company in accordance with this article to:

- Learn whether their personal data are processed or not,
- Request information if their personal data are processed,
- Learn the purpose of processing the personal data and whether they are used in compliance with the respective purpose,
- Know the third persons to whom their personal data are transferred at home or abroad,
- Request the rectification of the incomplete or inaccurate data, if any,
- Request the deletion or destruction of personal data in the event that the reasons requiring the processing of personal data disappear,
- Request notification of correction and deletion to third parties to whom personal data are transferred,
- Object to any unfavorable circumstances arising from the exclusively processed data by means of automatic systems,

- Request compensation for the damage arising from the unlawful processing of their personal data.

Requests from data subjects to exercise one of the above rights will be met by the Company within 30 days at the latest. These requests can be submitted to **Ak Portföy Yönetimi AŞ Sabancı Center Hazine Binası Kat 1 34330 4.Levent - Beşiktaş - İstanbul** by hand delivery in person with identification documents, or by sending them to the same address through a notary public, or by sending them to **akportfoy@hs01.kep.tr** with secure electronic signature. In this context, written applications regarding this matter can only be accepted after identity verification by us. In addition, the request form template that can be used by data subjects during their applications is available at <https://www.akportfoy.com.tr/image/docFile/4025>. If the requests require an additional cost, the Company may charge a fee in the amounts determined within the scope of the relevant legislation.

### 6.8. Transferring Data Abroad

Personal data may be transferred abroad in accordance with the legislation in order to meet the purposes exemplified in the “**Purposes of Processing Personal Data**” section of this Policy for processing, storage, administration or any other purpose specified in this Policy. Necessary precautions are taken to ensure that personal data is properly protected in these transfers.

### 6.9. Security of Personal Data

The Company is committed to protecting the confidentiality and security of personal data. Accordingly, necessary technical and administrative security measures are taken to protect personal data against unauthorized access, damage, loss or disclosure. In this direction, necessary system access controls, data access controls, secure transfer controls, business continuity controls and other necessary corporate controls are applied.

## 7. EFFECTIVE AND UPDATES

This Policy entered into force on 23.05.2019 upon approval by the Company's Board of Directors. The policy will be reviewed annually and updated if deemed necessary. Amendments to the Policy will enter into force upon the approval of the Company's Board of Directors. However, the Company reserves the right to review this Policy in line with the amendments in the legislation, changes in a technical standard which is referenced, actions and/or decisions to be taken by the Personal Data Protection Board and court decisions and to update, amend or eliminate the policy and create a new policy when necessary. The Board of Directors of the Company is authorized to decide on the abrogation of the Policy.