

WEBSITE CONFIDENTIALITY DISCLOSURE OF DEUTSCHE BANK A.Ş VE DEUTSCHE SECURITIES MENKUL DEĞERLER A.Ş

Aim of this Confidentiality Disclosure is to identify the terms and conditions applicable to utilization of the personal data shared with Deutsche Bank A.Ş. and Deutsche Securities Menkul Değerler A.Ş. (“Company, DB”) on **www.db.com.tr** and **www.deutschesecurities.com.tr** websites (“Website”) during procurement of services offered by the Company by website users/members/visitors (“Data Subject”) or those personal data created by the Company during utilization of the Website by the Data Subject.

Which personal data are being processed?

DB aims to improve operation of the Website; therefore, uses your personal data after being anonymized by using cookies, which are technical communication files, (domain name, pages visited and duration of the visit). In accordance with Articles 3 and 7 of the Law on Protection of Personal Data, irreversibly anonymized data will not be accepted as personal data based on the provisions of the said law.

It is possible to execute different personal data processing procedures based on different declarations received from or notifications to Data Subjects during collection and processing of personal data on the website.

For which purposes are the data used?

The Company collects and processes personal data provided by Data Subjects for the purposes of statistics and marketing only.

Furthermore, the Company may process personal data in accordance with Article 5 and 8 of the Law on Protection of Personal Data and/or in case requirements stipulated in the relevant legislation are met without receiving a separate consent from the Data Subject and may share the same with third parties in cases when:

- it is expressly stipulated in the relevant laws,
- personal data processing is mandatory to preserve life or body integrity of a personal data subject or another and it is not possible for the personal data subject to disclose his/her consent due to physical impossibility or illegality,
- processing of personal data is directly related to and necessary for execution or implementation of a contract by and between the Data Subject and the Company,
- processing of personal data is mandatory to fulfil legal obligations,
- personal data are already made public by the Data Subject,
- data processing is mandatory to establish, exercise or to protect a right, or
- Company is obliged to engage in personal data processing for its legitimate benefits provided that fundamental rights and freedoms of data subjects are not damaged.

Who has access to personal data?

The Company may transfer personal data of the Data Subject and the new data created using these personal data with third parties such as providers of the hosting service procured by the Company, vendors from whom statistics and marketing services are procured and Deutsche Bank AG in order to conduct the transactions requested by the Data Subjects, provided that utilization of such data will be limited with provision of these services.

The Company may not disclose the personal data collected regarding the Data Subject to other parties contrary to this Confidentiality Disclosure or the relevant provisions of the Law on Protection of Personal Data nor may it use the same for purposes other than those indicated. In case links are provided on the website to other applications, the Company will not be liable from confidentiality disclosures or contents of such external links.

Regarding the right to access the personal data and submitting a correction request

With an application to the Company, data subjects may

- learn whether or not their personal data are being processed,
- request information if their personal data have been processed,

- learn the purpose of personal data processing and whether these data are being used for the indicated purpose,
- request information on third parties in Turkey or abroad to whom their personal data have been transferred,
- If their personal data have been processed deficiently or erroneously, request their correction and to request notification of the same to the third parties to whom their personal data have been transferred,
- request deletion or destruction of personal data if, though processed in accordance with the Law no. 6698 and other relevant laws, the reasons necessitating processing of the data no longer exist and to request notification of the same to the third parties to whom their personal data have been transferred,
- object to any negative result via analysis of the processed data via exclusively automatic systems, and
- request compensation of any damages they have sustained due to illegal processing of their personal data,

Data Subjects may communicate their requests above with the Company in writing to the address Esentepe Mahallesi, Büyükdere Caddesi, Tekfen Tower No: 209 K: 17-18 Şişli 34394 İstanbul, Turkey. The Company may produce a positive/negative reply to these requests in writing or via digital media. It is essential that no fee be charged in return of the requests made. However, in case the transactions to be conducted to provide a request with a reply require an additional cost, it is possible that the Company charges the fee stipulated in the tariff in Article 13 of the Law on Protection of Personal Data.

Retention period of personal data

The Company will retain personal data provided by Data Subjects in order to meet the requirements arising from the nature of the services provided as long as the services are offered.

Measures and commitments regarding data security

The Company hereby undertakes to take the technical and administrative precautions and to have the necessary audits performed under conditions stipulated in the relevant legislation or defined in this Confidentiality Disclosure, for the purposes of establishing the necessary level of security to avoid illegal processing of or unauthorized access to personal data and to protect the personal data. The Website collecting personal data of the Data Subjects is encrypted using an encryption module operated via users' browsers. The Website has an internationally recognized encryption certificate. Furthermore, the Company takes the most up-to-date security precautions in the technical sense during access to the accounts and custody accounts accessed on the Website ensuring that Firewalls prevent any unauthorized access. Therefore, encryption and identification systems used in different layers prevent unauthorized access of third parties to the data. Sophisticated encryption methods are applied internally in order to prevent unauthorized deciphering. Additionally, digital identities are created and assigned for protection purposes during transfer of personal data.