

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

A. Data Controller

In accordance with [the Personal Data Protection Law](#) ("Law"), your personal data will be processed by the data controller Deutsche Bank A.Ş. ("Bank" or "Company") within the scope described below.

This notice covers corporate customers, their employees, authorised representatives, managers, agents, and beneficial owners whose personal data is obtained within the scope of the business relationship with our Bank.

B. Your Personal Data Processed, Purposes of Processing Your Personal Data and Legal Grounds

Article 5 of the Law regulates the legal grounds for processing personal data. Below, we outline the purposes for which we process your personal data and the legal grounds on which we rely for such purposes:

Legal Grounds for Data Processing	Purposes of Data Processing	Processed Personal Data
<p><u>Article 5(2)(f) of the Law</u></p> <p>Where processing is necessary for the legitimate interests pursued by the data controller, except where such interests are overridden by the fundamental rights and freedoms of the data subject</p>	<ul style="list-style-type: none"> – Contacting you in the course of our activities, – Conducting risk management and control processes, – Receiving and resolving your complaints, questions and requests, – Ensuring compliance with Deutsche Bank Group global and local policies, – Collecting your feedback on the services provided; taking your feedback into account in improving and developing our services, – Planning and conducting visits, meetings and organizing events, – Reviewing, auditing and reporting on our activities. 	<ul style="list-style-type: none"> – Identity (First name, surname) – Contact (Telephone number, email address, address) – Customer Transactions (Information related to banking products/services and customer transactions, including instructions, clearing, settlement, value transfers and interbank transfer processes) – Finance (payment/transaction information, bank account information, IBAN number, receipt and statement information, payment description) – Professional Experience (title, company worked for, profession, department and position information) – Transaction Security (log records, IP address)
<p><u>Article 5/2(c) of the Law</u></p> <p>Where it is necessary for the establishment or performance of a contract</p>	<ul style="list-style-type: none"> – Execution of the procedures required for the establishment of the contract between us and the customer and the opening of an account (e.g. obtaining a power of attorney, identification of persons authorized to perform transactions and execution of limit setting processes, creation of system records) – Execution of banking transactions and provision of financial services; execution of payment instructions, clearing, settlement, value transfers and interbank transfer processes, 	<ul style="list-style-type: none"> – Identity (Name and surname, date and place of birth, Turkish ID number, foreign ID number, tax ID number, passport number, mother's maiden name, nationality and signature sample, power of attorney and ID/driving licence/passport photocopy) – Contact details (telephone number, email address, address) – Customer Transactions (Information related to banking products/services and customer transactions, including instructions, clearing, settlement, value transfers and interbank transfer processes)

	<ul style="list-style-type: none"> - Creating your record in our systems as part of providing our services; managing customer accounts and transactions, - Fulfilling our customer's requests and instructions regarding services, - Execution of finance and accounting processes. 	<ul style="list-style-type: none"> - Finance (payment/transaction information, bank account details, IBAN number, account number, BIC code, statement and extract information) - Professional Experience (title, company name, profession, department and position information) - Transaction Security (log records, IP address)
<p><u>Article 5/2(e) of the Law</u></p> <p>Data processing is necessary for the establishment, exercise, or defence of a claim</p>	<ul style="list-style-type: none"> - Protection and exercise of our rights in the event of a potential dispute and the conduct of legal transactions. - Detection and prevention of suspicious/illegal transactions and problems and errors within the scope of providing banking services. 	<ul style="list-style-type: none"> - Identity (Name and surname, date and place of birth, Turkish ID number, foreign ID number, tax ID number, passport number, mother's maiden name, nationality and signature sample, power of attorney and ID/driving licence/passport photocopy) - Contact (telephone number, email address, address) - Customer Transactions (Information related to banking products/services and customer transactions, including instructions, clearing, settlement, value transfers and interbank transfer processes) - Finance (payment/transaction information, bank account details, IBAN number, custody account number, BIC code, statement and extract information, payment description) - Professional Experience (title, company worked for, profession, department and position information) - Transaction Security (log records, IP address) - Risk Management (Information obtained in the context of combating money laundering and terrorist financing, as well as risk assessment and inquiries) - Other (your explanations regarding complaints, questions, requests and surveys, customer correspondence and communication records) - Legal Transaction(s) (Official correspondence, information regarding court/enforcement files in the event of a dispute)
<p><u>Article 5/2(a) of the Law</u></p>	<ul style="list-style-type: none"> - Obtaining the documents required for opening an account; performing identity and transaction verifications, - Implementation of anti-financial crime compliance processes, 	<ul style="list-style-type: none"> - Identity (Name and surname, date and place of birth, Turkish ID number, foreign ID number, tax ID number, passport number, mother's maiden name, nationality and signature sample, power

<p>It is expressly provided for by the laws.</p> <p><u>Law Art. 5/2 (c)</u></p> <p>Necessary for the data controller to fulfil its legal obligations</p>	<ul style="list-style-type: none"> - Analysing the customer's financial situation to monitor credit risk, consolidate and assess suitability, - Implementing customer identification policies (KYC) and processes to combat money laundering and terrorist financing (AML/CFT), - Verifying account movements; preparing detection and audit reports, - Ensuring that our activities are conducted in accordance with legislation, internal policies and procedures, - Fulfilling our legal obligations in cases where authorised institutions or organisations request information from our Company or where we are required to notify these institutions (e.g. sharing information in response to a request from a public institution regarding a transaction suspected of being unlawful). 	<ul style="list-style-type: none"> - of attorney and identity card/driving licence/passport photocopy) - Contact (Telephone number, email address, address) - Customer Transactions (Information related to banking products/services and customer transactions, including instructions, clearing, settlement, value transfers and interbank transfer processes) - Finance (payment/transaction details, bank account details, IBAN number, custody account number, BIC code, statement and extract details, payment description) - Professional Experience (title, company worked for, profession, department and position information) - Transaction Security (log records, IP address) - Risk Management (Information obtained in the context of combating money laundering and terrorist financing, as well as risk assessment and inquiries) - Other (communication records)
<p><u>Section 6(3)(b) of the Law</u></p> <p>It is expressly provided for by the laws.</p>	<ul style="list-style-type: none"> - Implementation of customer identification policies (KYC) and processes to combat money laundering and terrorist financing (AML/CFT). 	<ul style="list-style-type: none"> - Criminal Convictions (information on criminal convictions obtained within the scope of combating money laundering and terrorist financing and risk assessment and inquiries)

C. Methods of Collecting Your Personal Data

Your personal data is collected automatically, semi-automatically, or non-automatically as part of a data recording system through email correspondence, telephone conversations, or the physical or electronic receipt of information/documents.

D. Processed Personal Data, Third Parties and Sharing Purposes

Your personal data is transferred to third parties within and outside the country in accordance with the Law for the purposes specified below:

Purpose of Transferring Personal Data	Parties to Whom Personal Data is Transferred
To fulfil our legal obligations in cases where authorised institutions or organisations request information from our Company or where we are required to notify such institutions.	Authorised Institutions and Organisations Within or Outside the Country

Obtaining product/service support from suppliers and business partners in order to fulfil the purposes specified under the heading “B. Your Processed Personal Data, Purposes of Processing Your Personal Data and Legal Grounds” ; and transferring data to relevant financial institutions for the execution of banking transactions.	Suppliers, Business Partners, and Financial Institutions Within or Outside the Country
Ensuring coordination in business processes and compliance with Deutsche Bank Group Company policies and rules, auditing and reporting activities, procurement of consultancy or services.	Group Companies Abroad ¹

Your personal data is transferred abroad in accordance with the By-Law on the Procedures and Principles Regarding the Transfer of Personal Data Abroad, published in the Official Gazette dated 10 July 2024 and numbered 32598, and relevant legislation, provided that appropriate safeguards are in place. The necessary technical and administrative measures are taken to ensure that data transfers abroad are carried out securely.

E. Your Rights Regarding Your Personal Data

You may exercise your rights as outlined in Article 11 of the Personal Data Protection Law by choosing one of the following methods:

1. You can fill out the Data Subject Application Form at www.db.com.tr,
2. You can send an email to kvk.istanbul@db.com using the email address registered in our systems.
3. You may choose other methods specified in the [Communiqué on Procedures and Principles for Applications to the Data Controller](#).

You can access comprehensive information about the Bank's processes regarding the protection and processing of personal data under the heading "**Protection of Personal Data**" at www.db.com.tr. For any questions, you can contact the Company Contact Person via the email address kvk.istanbul@db.com.

¹ Direct or indirect shareholders, subsidiaries, branches, and affiliates of Deutsche Bank AG.