

## COOKIE POLICY

### A. About This Policy

Deutsche Bank A.Ş. (“**Deutsche Bank**” or the “**Company**”) is committed to ensuring the highest standards of data privacy and transparency. This Cookie Policy (“**Policy**”) is intended to inform you about how cookies are used on our website [country.db.com/turkey](https://country.db.com/turkey) (the “**Site**”), as well as to explain the choices available to you if you prefer to disable cookies—despite the enhanced functionality and user experience they offer.

You can find more information about the purposes of processing your personal data by our Company in the Deutsche Bank Anonim Şirketi Principles on the Protection and Processing of Personal Data, available at <https://country.db.com/turkey/kisisel-verilerin-korunmasi>. We also recommend that you review the Privacy Notices provided for each specific process.

### B. Definition of Cookies

Cookies are small text files that are placed on your device to support the technical functionality and operability of the website. Deutsche Bank uses cookies in certain areas of its website to facilitate your navigation and enhance the personalisation of your user experience.

Through the use of cookies, the user’s device can be recognised, the effective operation of the Site can be ensured, user preferences (such as language selection or site settings) can be remembered, the content on the Site can remain up to date, and the Site can continue to serve its purpose in a user-friendly manner.

### C. Terminology

To ensure clarity regarding cookies, the following definitions apply within this Policy:

**First-Party Cookies:** Cookies created by the website that the user is currently visiting.

**Third-Party Cookies:** Cookies set by domains other than the website being visited. For instance, cookies provided by a specialized analytics provider that delivers data on the number of visitors to Deutsche Bank’s website are considered third-party cookies (used for usage analytics purposes).

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**Persistent Cookies:** Cookies that stay on your device after your session ends even after you close your browser. These cookies are reactivated each time you visit the website. For example, if a persistent cookie is used to remember your login credentials, you will not need to re-enter these details each time you access the website (functional and preference-based cookies).

**Session Cookies:** Session cookies are temporary and are generally used to ensure the proper functioning of a website. For instance, they allow users to navigate between pages without needing to log in again. All session cookies are deleted once the browser is closed.

**Flash Cookies:** Cookies used by websites containing media content (e.g., video clips). These cookies require Adobe Flash software. They enable faster loading of media content and the storage of data regarding media access from the user’s device (functional and preference-based cookies).

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**Necessary (Essential) Cookies:** These cookies are essential for the functionality of the website.

**Functional Cookies:** These cookies are used to remember your preferences regarding the use of the website and to personalise your browsing experience accordingly.

**Marketing Cookies:** These cookies are used to display content tailored to your preferences and interests and to measure the effectiveness of such content.

**D. Purposes of Use and Legal Grounds for Cookies**

The Site uses necessary (technical), functional, and marketing cookies. The cookies used on the Site, their purposes of use, and the legal grounds for their use under Article 5 of the [Law on the Protection of Personal Data No. 6698](#) (“**Law**”) are outlined below.

**Necessary Cookies:**

Cookie Name	Purpose of Use	Legal Ground	Retention Period	Provider
<b>Usercentrics Consent Management Platform</b>	This is a consent management service. It is used on the website for the purpose of managing user consent.	Processing of data is necessary for the legitimate interests pursued by the data controller ( <b>Art. 5/2-f of the Law</b> )	3 years	First-Party country.db.com
<b>Webtrekk</b>	This is a web analytics and statistics service.		6 months	First-Party country.db.com
<b>dotCMS Site Settings</b>	dotCMS is a content management system. Various modules of the system use local storage to store information.		Duration of Session	First-Party country.db.com
<b>sitevisitscookie</b>	Tracks how many times the user has visited our site. It relies on the dmid value to monitor the user anonymously.		400 days	First-Party country.db.com

**Functional Cookies:**

Cookie Name	Purpose of Use	Legal Ground	Retention Period	Provider
<b>Captivate Podcast</b>	Enables podcast playback functionality.	The explicit consent of the data subject ( <b>Art. 5/1 of the Law</b> )	Duration of Session	First-Party country.db.com
<b>Flipsnack Player</b>	Interactive PDFs		Duration of Session	Third-Party
<b>MovingImage</b>	This is a video manager. Through this service, users can upload, manage, publish, and deliver audio and video content.		Duration of Session	First-Party country.db.com
<b>Social Media wall</b>	Provides social media integration.		1 year	First-Party country.db.com
<b>Sprinklr</b>	Provides social media integration.		6 days	First-Party country.db.com

### Marketing Cookies:

Cookie Name	Purpose of Use	Legal Ground	Retention Period	Provider
YouTube Video	This is a video player service.	The explicit consent of the data subject <b>(Art. 5/1 of the Law)</b>	10 years	Third-Party

#### **E. Personal Data Processed Through Cookies**

Through cookies, your personal data related to identity (*user ID*) and transaction security (*such as IP address, browser and operating system, date and time of your visit, interaction status — e.g., whether you were able to access the Site or received an error message*), usage of the Site’s features, search queries you entered, frequency of your visits, language preferences, scrolling behavior, and information about the tabs you accessed — collectively referred to as *user activity logs* — are processed.

#### **F. Collection of Personal Data Through Cookies**

The personal data specified above are collected through cookies by automated means (without human intervention). The legal grounds for the processing of personal data through cookies are those set out under the section titled “*Purposes of Use and Legal Grounds for Cookies.*”

#### **G. Sharing of Data Collected Through Cookies**

The personal data collected through cookies are shared with third-party cookie providers in line with the purposes and legal grounds specified under the section titled “*Purposes of Use and Legal Grounds for Cookies*” in this Cookie Policy. The sharing of your personal data is carried out in compliance with the rules set out under Articles 8 and 9 of the Law.

Purpose of Transfer of Personal Data	Parties to Whom Personal Data is Transferred
In cases where authorized institutions or organizations request information from our Company, or where we are required to notify such institutions, for the fulfillment of our legal obligations	<b>Authorized Institutions and Organizations</b>
Obtaining product/service support from cookie service providers, suppliers, and business partners for the purposes specified under the heading “D. Purposes of Use and Legal Grounds for Cookies”	<b>Domestic and International Suppliers and Business Partners</b>
Ensuring coordination in business processes and compliance with group policies, and conducting review and audit processes, and obtaining product/service support as well as support for information technology infrastructures.	<b>Deutsche Bank Group Companies</b>

## H. Management of Cookies

You can set your browser to disable cookies. Most browsers offer different options to protect your privacy. For instance, you may choose to allow first-party cookies while blocking third-party cookies.

Options for managing cookies in your browser are usually available in the browser's help function or in the settings section of your smartphone. You may access the cookie management instructions for the specified browsers via the links below:

Click to Access the Relevant Browser Cookie Management Pages:				
<a href="#">Microsoft Edge</a>	<a href="#">Firefox</a>	<a href="#">Google Chrome</a>	<a href="#">Opera</a>	<a href="#">Safari</a>

You can also click on the [Cookie Settings](#) link to customize which cookies will be used according to your preferences.

## I. Data Subject Rights and Their Exercise

As a data subject, you may exercise your rights specified under Article 11 of [the Law](#) by using one of the following methods:

1. You may fill out the Data Subject Application Form available at [country.db.com/turkey/kisisel-verilerin-korunmasi](https://country.db.com/turkey/kisisel-verilerin-korunmasi),
2. You may send an email to [kvk.istanbul@db.com](mailto:kvk.istanbul@db.com) using your email address registered in our systems,
3. You may use other methods specified in [the Communiqué on the Principles and Procedures of Application to the Data Controller](#).

In the event that you submit a request regarding your rights to the Bank, the Bank will conclude your application free of charge as soon as possible and within thirty days at the latest, depending on the nature of your request. However, we would like to note that if the process requires an additional cost, the Bank may charge the fee stipulated in the tariff determined by the Personal Data Protection Board.

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