

**DEUTSCHE BANK ANONİM ŐİRKETİ**  
**PRINCIPLES ON THE PROTECTION AND PROCESSING OF**  
**PERSONAL DATA**

## 1. Introduction

### 1.1. Purpose and Scope

The Personal Data Protection Law No. 6698 (“Law”) entered into force on April 7, 2016. Within this framework, **Deutsche Bank A.Ş. Principles on the Processing and Protection of Personal Data** (“Principles”) have been enacted in order to ensure the compliance of Deutsche Bank Anonim Şirketi (“Company” or “Deutsche Bank”) with the Law and to set out the principles to be followed in fulfilling its obligations regarding the processing and protection of personal data.

The Principles set forth the conditions for the processing of personal data and explain the fundamental principles adopted by Deutsche Bank in this process. In this context, the Principles contain general explanations covering all activities carried out by the Company regarding the processing of personal data belonging to natural persons other than Deutsche Bank employees, and all relevant individuals whose personal data are processed.

For each process in which the personal data or special categories of personal data of relevant individuals are processed, separate privacy notices are provided, which offer process-specific information.

### 1.2. Entry into Force and Amendments

The Company reserves the right to amend the Principles in line with legal regulations. The current version of the Principles is accessible via Deutsche Bank’s website at <https://country.db.com/turkey/kisisel-verilerin-korunmas>.

In case of any conflict between the applicable legislation, particularly the Law, and the provisions set forth in these Principles, the provisions of the applicable legislation shall prevail.

## 2. PRINCIPLES AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

### 2.1. Principles for the Processing of Personal Data

Deutsche Bank processes personal data in compliance with the principles set out in Article 4 of the Law. These principles must be observed in every personal data processing activity:

- **Processing personal data lawfully and in accordance with the rules of good faith:** Deutsche Bank fully complies with applicable laws, relevant secondary regulations, and general principles of law in the processing of personal data. Data is processed only for the purposes determined, and the legitimate expectations of the data subjects are taken into account throughout the process.
- **Accuracy and up-to-dateness of personal data;** Deutsche Bank carefully conducts the necessary checks to ensure the accuracy and currency of the personal data it processes. In this regard, data subjects are granted the right to request the correction or deletion of inaccurate or outdated data.
- **Processing personal data for specific, explicit, and legitimate purposes;** Before starting any data processing activity, Deutsche Bank clearly, explicitly, and lawfully determines the purposes for which the data will be processed.

- **Being relevant, limited, and proportionate to the purpose of processing;** Personal data is processed only to the extent necessary to achieve the determined purpose. Measures are taken to ensure that data not relevant to the purpose is not processed.
- **Retention of personal data for the period required by legislation or for the purpose of processing;** Deutsche Bank retains personal data for the period stipulated in the applicable legislation or for as long as required by the processing purpose. Once these periods expire or the processing purpose ceases to exist, personal data is deleted, destroyed, or anonymized in compliance with legislation.

## 2.2. Conditions for Processing Personal Data

The Company processes your personal data only if at least one of the conditions set forth in Article 5 of the Law exists. Explanations regarding these conditions are provided below:

- Deutsche Bank may process personal data **based on the explicit consent of the data subject** in cases where no other data processing condition exists. Such consent must be given freely, based on sufficient information, in a manner that leaves no room for doubt, and limited to a specific processing purpose.
- **If the processing of personal data is explicitly stipulated in the law,** Deutsche Bank may process personal data without the explicit consent of the data subject and will fully comply with the applicable legal regulations during this process.
- **In cases where it is impossible to obtain the explicit consent of the data subject due to factual impossibility and data processing is mandatory,** Deutsche Bank may process the personal data of individuals who are unable to declare their consent or whose consent would not be legally valid, if it is necessary to protect the life or physical integrity of the data subject or a third person.
- **Where the processing of personal data is directly related to the conclusion or performance of a contract,** the personal data of the parties to a written or verbal contract concluded between the data subject and Deutsche Bank may be processed if it is necessary for the performance of that contract.
- **If processing personal data is mandatory for the data controller to fulfil its legal obligations,** Deutsche Bank may process personal data for the purpose of fulfilling such obligations in accordance with the applicable legislation.
- **If the data subject has made their personal data public in any way or made it accessible to everyone,** Deutsche Bank may process such personal data without the explicit consent of the data subject, provided that it is limited to the purpose of disclosure.
- **If the processing of personal data is mandatory for the establishment, exercise, or protection of a right,** Deutsche Bank may process the personal data of the data subject without their explicit consent.
- **Where processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject,** Deutsche Bank may process personal data as long as the balance between the interests of Deutsche Bank and those of the data subject is maintained. Before processing, the Company evaluates its legitimate interest and the possible impact of the processing on the data subject, and only processes the data if this balance of rights and interests is not disrupted.

### 2.3. Conditions for Processing Special Categories of Personal Data

Special categories of personal data are specified in Article 6 of the Law in a limited manner. These data include information regarding a person's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or trade union membership, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Deutsche Bank processes special categories of personal data in full compliance with the relevant legislation and by applying the additional safeguards required by the Personal Data Protection Board ("Board") under the following circumstances.

- **Special categories of personal data may be processed if the explicit consent of the data subject is obtained:** In such cases, explicit consent must be given freely, based on sufficient information, in a manner that leaves no room for doubt, and limited to a specific processing purpose. If no other legal ground for processing exists as specified in the Law, explicit consent of the data subject must be obtained.
- **Explicit provision in laws:** If there is a clear regulation in the relevant laws regarding the processing of special categories of personal data, such data is processed on the basis of this legal processing condition.
- **Necessity for the protection of life or physical integrity of a person who is unable to express consent due to actual impossibility or whose consent is not legally valid:** Special categories of personal data belonging to persons who are unable to declare their consent or whose consent is not legally recognized are processed when it is necessary to protect the life or physical integrity of the person or another individual.
- **Personal data made public by the data subject, in line with the intention of disclosure:** Special categories of personal data that have been made public by the data subject are processed only in accordance with the purpose of disclosure and limited to that purpose.
- **Necessity for the establishment, exercise, or protection of a right:** Special categories of personal data are processed when it is necessary for the establishment, exercise, or protection of a right.
- **Necessity for public health, preventive medicine, medical diagnosis, treatment and care services, as well as planning, management, and financing of health services, by persons or authorized institutions under confidentiality obligation:** Special categories of personal data are processed by persons under confidentiality obligation, such as workplace physicians, for purposes including preventive medicine, medical diagnosis, treatment and care services, as well as the planning, management, and financing of health services.
- **Necessity for fulfilling obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance:** The data subject's special categories of personal data are processed in cases where it is necessary to fulfil legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance.
- **In relation to foundations, associations, and other non-profit organizations or formations established for political, philosophical, religious, or trade union purposes, provided that they comply with the applicable legislation and their purposes, are limited to their fields of activity, and are not disclosed to third parties; concerning their current or former members and affiliates, or persons who are in regular contact with such organizations or formations:** Special categories

of personal data belonging to the data subject are processed, provided that it is in compliance with the applicable legislation and the purposes of foundations, associations, and other non-profit organizations or formations established for political, philosophical, religious, or trade union purposes, limited to their fields of activity, and not disclosed to third parties, in cases where it concerns their current or former members, affiliates, or persons who are in regular contact with such organizations or formations.

### **3. TRANSFER OF PERSONAL DATA**

Deutsche Bank carries out the transfer of personal data in accordance with the provisions set forth under Articles 8 and 9 of the Law and additional regulations determined by the Board. Data transfers are carried out only when the legal requirements regarding the transfer of personal data are met and when necessary. In this context, personal data may be transferred to third parties within the country or abroad.

- ***Transfer of personal data to third parties within the country***, personal data may be transferred by Deutsche Bank to third parties within the country, in compliance with the fundamental principles, provided that at least one of the data processing conditions set forth in Articles 5 and 6 of the Law and explained in this Policy is met.
- ***Transfer of personal data to third parties abroad***, in accordance with Article 9 of the Law, personal data belonging to data subjects within the scope of the Law may be transferred abroad by ensuring appropriate safeguards, in compliance with the Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad published in the Official Gazette dated July 10, 2024, and numbered 32598, as well as other relevant legislation provisions.

Within the scope of the general principles of the Law and the data processing conditions set forth in Articles 8 and 9, Deutsche Bank may transfer data to relevant parties during the data processing activities when necessary. The parties to whom personal data are transferred and the purposes of such transfers are explained in the privacy notice provided for each specific process.

### **4. DELETION, DESTRUCTION, AND ANONYMIZATION OF PERSONAL DATA**

Pursuant to Article 7 of the Law, even if personal data have been processed in accordance with the law, they shall be deleted, destroyed, or anonymized when the reasons requiring their processing no longer exist. Deutsche Bank takes industry practices into account when retaining personal data; unless a longer retention period is prescribed by law, personal data are destroyed either ex officio or upon the request of the data subject, in accordance with the guidelines of the Personal Data Protection Authority, the determined periodic destruction schedules, and data subject applications.

### **5. INFORMATION AND RIGHTS OF THE DATA SUBJECT**

Pursuant to Article 10 of the Law, data subjects must be informed before or at the latest at the time of the processing of their personal data. In this regard, as the data controller, Deutsche Bank has established the necessary internal procedures and structures to ensure that data subjects are duly informed in all cases where personal data processing activities are carried out.

In relation to your personal data, you may submit your requests within the scope of Article 11 of the Personal Data Protection Law (“Law”) to Deutsche Bank in accordance with the “Communiqué on the Procedures and Principles of Application to the Data Controller.” Applications may be made in writing, or electronically via registered electronic mail (KEP) address, secure electronic signature, mobile signature, or by using the e-mail address previously provided to Deutsche Bank and registered in our system.

You may use the **Data Subject Application Form** available at <https://country.db.com/turkey/kisisel-verilerin-korunmasi> when submitting your applications regarding your rights under the Law. Depending on the nature of your request, your application will be concluded as soon as possible and within thirty (30) days at the latest, free of charge. However, if the process requires additional cost, a fee may be charged based on the tariff determined by the Board.

Deutsche Bank first verifies whether the person submitting the application is the actual right holder. In addition, where necessary, the Company may request further details or additional information to better understand the request. Responses to data subject applications are provided by the Company to the applicants in writing or electronically. In case of rejection, the reasons for the rejection will be explained to the data subject in a reasoned manner.

If personal data are not obtained directly from the data subject, the Company ensures that the data subject is informed (1) within a reasonable period after the personal data have been obtained, (2) at the time of the first communication if the data will be used for communication purposes, and (3) at the latest, at the time of the first transfer of the personal data, if the data are to be transferred to another party.