

**FİBABANKA ANONİM ŞİRKETİ**  
**PRIVACY NOTICE FOR OPEN BANKING PROCESSES**

We, as Fibabanka Anonim Şirketi (“**Company**” or “**Fibabanka**”), acting in the capacity of data controller, would like to inform you about personal data processing operations on personal data owned by our customers who are to make use of Open Banking service rendered in accordance with regulations of Central Bank of the Republic of Türkiye (“**CBRT**”), as provided by other banks/ payment service providers in compliance with the Law on Personal Data Protection no. 6698 (“**LPPD**”) and the secondary legislation thereof (jointly, the “**PDP Law**”).

**1. Your Personal Data That Shall Be Processed, Collecting Methods, Processing Purpose and Reasons of Legality**

Your personal data specified below (“**your personal data**”) shall be collected by automatic and non-automatic means, electronically, verbally or in writing by our Company in accordance with Law no. 6493 on Payment and Securities Settlement Systems, Payment Services and Electronic Currency Institutions and the Regulation on Payment Services and Electronic Money Issuance and Payment Service Providers and in line with requirements of Open Banking service to be provided to you, in physical or electronic media in connection with, in limitation to following purposes and in a moderate manner and in accordance with the principles defined in the LPPD and in compliance with the PDP Law.

This Privacy Notice is prepared, in a manner covering the legal reasons defined in the law with regards to your personal data that shall be processed within the scope of all products and/or services offered to you by our Bank.

Your personal data that shall be processed within the framework of the products and/or services offered by our Bank, are as follows:

**Your Personal Data That Shall Be Processed:**

- **Identity Information** (name, surname, Republic of Turkey Identity Number (RTIN), date of birth, place of birth, gender)
- **Contact Details** (phone number, e-mail address)
- **Financial information at other banks** (movements of accounts at the other bank, account details, IBAN information at the other bank, information on products one has at the other bank)
- **Customer transaction information at other banks** (balance details at the other bank, dates of transaction at other banks, types of transaction, transaction channels)
- **Customer transaction information** (segment information, customer registry number, customer criterion information)
- **Other** (usage habits of products and services, usage status of mobile banking)

**Reasons of Legality**

- **Provided that it is directly relating to concluding or implementing an agreement, requirement to process the personal data relating to the parties to an agreement (article 5/2 (c))**

Viewing account details available at other account service provider (“**HHS**”) at the Bank’s mobile banking and rendering account service, initiating a payment order at payment accounts held at other payment service provider (“**ÖHS**”) without access to ÖHS, viewing account details held at the bank via other HHS online platforms and rendering account service, initiating payment order without access to the bank via other ÖHS online platforms,

- **Explicit Consent (article 5/1)**

Sending text, e-mail messages to customers for marketing/publicity purposes, calling customers for marketing/promotion purposes, presentation of publicity, offer, promotion, push notification from mobile banking via mobile media conducting questionnaires, activities intended for customer satisfaction, collection of customer feedback, establishing target customers group to be contacted for marketing purposes, reinforcement of segmentation information, conducting an analysis tailored for customers to derive deposit interest over advantageous interest rates, transactions conducted over digital channels and statistical analysis thereof, enhancement of customer experience over digital channel.

## 2. Sharing Your Personal Data with Third Persons

### 2.1 Disclosure / Transfer in Turkey

Your personal data described above, shall be disclosed/transferred to the receiver groups specified below, in accordance with the purposes and reasons of legality set forth below.

- **Based on the legal reason of requirement to process the personal data relating to the parties to an agreement (article 5/2 (c)), provided that it is directly relating to concluding or implementing the agreement**

For purposes of viewing account details held at the bank via other HHS online platforms and rendering account service, initiating payment order without access to the bank via other ÖHS online platforms, your personal data are transferred to **Other Banks, account service providers, and payment service providers**

- **Based on the legal reason of explicit consent,**

Your personal data are transferred to **Suppliers** for the purpose of conducting a questionnaire within scope of customer satisfaction, collection customer feedbacks, profiling and in-depth analysis of customers;

Your personal data are transferred to **Other Group of Recipients** (Message Management System) for the purpose of fulfilling obligations associated with sending commercial electronic message.

## 3. Your right to be informed

Under The Law on Personal Data Protection, Article 11, you can apply to our Company; **(a)** to be informed whether your personal data is processed, or not; **(b)** if processed, to request information in relation thereto; **(c)** to learn purpose of processing and whether it is used according to intended purpose, or not; **(d)** to know the third persons to whom your personal data is disclosed in Turkey and abroad; **(e)** if processed incompletely or incorrectly, rectification thereof; **(f)** to request the erasure or destruction of your personal data under the conditions laid down in Article 7; **(g)** to request notification of the transactions made according to the paragraphs (e) and (f), to third persons to whom personal data has been disclosed/transferred; **(h)** to object against any outcome which shall arise due to analysis thereof by means of automatic systems exclusively, and **(i)** to request compensation for the damage arising from the unlawful processing of your personal data.

## 4. Your Requests

If you have any question or request relating to processing of your personal data within the scope of this Privacy Notice, you can apply to our Company either by the Online Form available at the web address <https://www.fibabanka.com.tr/bilgi-toplumu-hizmetleri/kvkk-kapsaminda-basvuru-talepleri> or via the Registered E-Mail System

Our Company shall handle and finalise the application requests, according to the nature of related request and at the latest within 30 (thirty) days, according to article 13 of the LPPD (Law on Personal Data Protection). When required due to nature of related transaction, tariff set by the PDP Board shall be applicable. If your request is refused, reason/s of refusal shall be specified in our response letter.

If you think that your personal data processed by our Company, is outdated, incomplete or incorrect, for your declarations relating to change(s) in your personal data, please contact our Company immediately via the e-mail address [fibabanka.kisiselveri@hs03.kep.tr](mailto:fibabanka.kisiselveri@hs03.kep.tr).

This Privacy Notice can be updated in order to adapt to changing conditions and legal regulations. You can follow the updates via the web address <https://www.fibabanka.com.tr/>.

**Data Controller**  
**Fibabanka Anonim Şirketi**

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