

DEUTSCHE BANK ANONİM ŞİRKETİ
GENERAL DISCLOSURE ON PROCESSING OF PERSONAL DATA

1. Aim and Scope of the Disclosure

This Disclosure has been prepared in line with the importance Deutsche Bank A.Ş. (“Company” or “Bank”) attributes to personal data, in order to indicate the attitude of the Company towards protection and processing of the data belonging to our clients, potential clients, candidate employees, shareholders and authorized personnel of the Company, our visitors, employees, shareholders and authorized personnel of the companies with which we co-operate and third parties and, essentially, to brief these persons and third parties on this issue.

This Disclosure is about the personal data, processed via automatic or non-automatic means provided that they are part of a data recording system, belonging to our clients, potential clients, candidate employees, shareholders and authorized personnel of the Company, our visitors, employees, shareholders and authorized personnel of the companies with which we co-operate and third parties.

This General Disclosure on Processing of Personal Data (“Disclosure”) issued by the Company was prepared on 7.10.2016. In case any or all articles of the Disclosure are amended, validity date and version of the Disclosure will be updated. This Disclosure will be published at the official website of the Company at (<https://www.db.com/turkey> or www.db.com.tr) and made available to relevant persons upon request.

2. Principles regarding Personal Data

a. Processing of Personal Data

Personal data are being processed by the Company, in accordance with Article 20 of the Constitution of the Republic of Turkey and Article 4 of the Law on Protection of Personal Data (the “Law”)

- in harmony with the applicable law and in good faith,
- accurately and, when required, in an up-to-date manner,
- for certain, express and legally valid purposes,
- in accordance with the specified purposes,
- in a limited manner and prudently,
- provided that such processed data will be retained for a period foreseen in the applicable laws and/or as long as required for the relevant purposes, and
- based on one or more conditions laid down in Article 5 of the Law.

The Company complies with its liability of public disclosure in accordance with Article 20 of the Constitution and Article 10 of the Law by providing information on

- the identity of Deutsche Bank A.Ş.,
- the purposes for which the personal data will be processed,
- to whom and for which purpose the processed data will be transferred,
- how the personal data are collected and the legal basis of such collection, and
- rights to which the personal data subject is entitled

at the time the relevant personal data are collected.

b. Processing Purpose of Personal Data

The Company processes personal data for the purposes stipulated in Article 5 of the Law and indicated herein below:

- explicit stipulation of the relevant laws that the Company may engage in activities which require processing of personal data,
- when processing of personal data is directly related to and necessary for execution or implementation of a contract by the Company,
- when processing of personal data is mandatory for the Company to fulfil a legal obligation,
- provided that the relevant personal data are made public, processing the same by the Company in a limited manner for making the same public,
- if processing of personal data by the Company is obligatory for establishing, exercising or protection of the rights of data subjects or third parties,
- if the Company is obliged to engage in personal data processing for its legitimate interests provided that fundamental rights and freedoms of data subjects are not damaged, and
- when personal data processing is necessary to protect life or limb of a personal data subject or another person and it is physically impossible or illegal for the personal data subject to give his/her consent.

In Article 6 of the Law, personal data which carry the risk of causing unjust treatment or discrimination when illegally processed are defined as "special categories of data". These data are related to race, ethnic origin, political opinions, philosophical beliefs, religion, religious sects or other beliefs, appearance or clothing, membership of associations, foundations or unions, health, sexual life, criminal convictions, information on security precautions and biometric and genetic data. Special categories of data will be processed by the Company in accordance with any requirements identified by the Board for the Protection of Personal Data (the "Board") and under the conditions below:

- when stipulated by the relevant laws, with the exception of those special categories of data regarding health and sexual life,
- Special categories of data regarding health and sexual life may only be processed for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing by competent persons or authorities under the obligation of confidentiality.

In case the above-mentioned data processing conditions do not exist, the Company is required to receive the express consent of the data subject to process the data in question.

The Company processes personal data within the scope of the conditions defined above and based on the purposes stated above:

- in order to i) provide banking services, ii) comply with local legislation, international law to which the Company's parent company is subject and regulatory requirements and iii) act in accordance with all Deutsche Bank AG and group company policies including the group policies established regarding know your customer principles based on AML legislation and group risk management policies,
- in order to apply human resources policy of the Company; execution of HR operations, hiring appropriate personnel to the vacant positions in the Company, fulfilment of the relevant liabilities in terms of occupational health and safety and taking the necessary precautions in accordance with HR policies,

- in order to ensure that legal and commercial liabilities towards persons with whom the Company has an ongoing business relationship are fulfilled; execution of administrative operations of the Company regarding communication, service related operations, physical security and audit of Company locations, assessment processes of business partners/ clients/ suppliers (authorized personnel or employees or partners), legal and commercial risk analyses, legal compliance process and financial affairs,
- in order to present the products and services offered by the Company to the clients after customization of the same based on the likes, habits and needs of the clients; one-to-one and/or integrated marketing activities, sales and after sales operations conducted by the Company,
- in order to determine and apply commercial and business strategies of the Company; finance operations, communication, market research and social responsibility activities, purchasing operations (demand, proposal, assessment, order placing, budgeting and contract making) conducted by the Company, internal system and application management operations, management of legal operations.

Personal data processed within the scope of this Disclosure by the Company are indicated in Annex-1 and the categories of data subjects whose data are being processed are shown in Annex-2.

c. Transfer of Personal Data

The Company may transfer the personal data stipulated in Section 2.b of this Disclosure for purposes indicated in the same section to the persons and institutions shown below for the purposes indicated:

- to business partners of Deutsche Bank in a limited manner to ensure that the purpose of the establishment of the said business partnership are fulfilled,
- to suppliers of Deutsche Bank in a limited manner to ensure that the outsourcing services provided to the Company by the suppliers and required by the Company in order to perform its commercial activities are procured,
- to subsidiaries of Deutsche Bank in a limited manner to ensure that the commercial activities which require participation of the Company's subsidiaries are performed,
- to Deutsche Bank AG, its subsidiaries, consultants and service providers in a limited manner to ensure that strategies regarding commercial activities of the Company are designed and risk management, financial consolidation and audit requirements and Deutsche Bank AG Group's policies are complied with,
- to Deutsche Bank shareholders in a limited manner to ensure that strategies regarding commercial activities of the Company are designed and for audit purposes, in accordance with the relevant legislation provisions,
- to legally authorized public bodies and associations in a limited manner to ensure that the request of the public body or association filed in accordance with their authority is complied with, and
- to private persons in a limited manner to ensure that the request of the private person filed in accordance with their authority is complied with.

After the Board for the Protection of Personal Data announces the foreign countries with the required level of protection in terms of personal data, the Company will transfer personal data only to these countries. For countries with no proper level of protection, the Company will transfer personal data to these countries only if data controllers in Turkey and in the said country undertake sufficient protection in writing and the Board permits the transfer.

ç. Method and Legal Grounds for Collecting Personal Data

Your personal data have been collected by the Bank via different channels and on different legal grounds in order to provide and to improve the services and products we offer and to conduct our commercial activities. Your personal data collected during this process are collected for the legal reason to conduct our commercial activities via our personnel or agents or from public databases within the scope of the applicable legislation. Your personal data collected on this legal ground may also be processed and transferred for the purposes stipulated in Articles (b) and (c) of this Disclosure within the scope of the personal data processing conditions and purposes indicated in Articles 5 and 6 of the Law no. 6698.

d. Retention and Deletion of Data

The Company retains the processed personal data for a period stipulated in the relevant legislation; in case no period is specified in the legislation, personal data will be retained by the Company as long as required based on the services provided by the Company whilst processing the same data, the Company's applications and established market practices and after this period, only to serve as evidence in case of possible legal disputes and during the period deemed necessary in practice. After the period defined above has expired, personal data retained are deleted, destroyed or anonymized¹.

3. Rights of the Data Subject

Article 20 of the Constitution of the Republic of Turkey stipulates that everyone has the right to be informed about his/her personal data; whereas, Article 11 of the Law stipulates that "the right to demand information" is among the rights of a personal data subject. In this respect, the Company makes the necessary notification in case a personal data subject demands information and this Disclosure provides information on how the right to demand information will be exercised and how information requests will be handled by the Company.

Personal data subjects have the following rights, namely to:

- 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

¹ Anonymization of personal data means rendering personal data identified or identifiable with a natural person by no means even by linking with other data.

- request compensation of any damages they have sustained due to illegal processing of their personal data.

In accordance with Article 28 of the Law, the issues below are excluded from the Law's scope; therefore, data subjects may not claim their rights in cases where:

- personal data are processed by means of being anonymized via official statistics for the purposes of research, planning and statistics,
- personal data are processed for artistic, historical, literary or scientific purposes or within the scope of freedom of speech, provided that national defence, national security, public security, public order, economic security, right of privacy or personal rights are not breached or no crime is committed,
- personal data are processed within the scope of preventive, protective or intelligence activities conducted by public authorities exclusively authorized for this purpose by law in order to provide national defence, national security, public security, public order or economic security, or
- personal data are processed by judicial or enforcement authorities regarding investigations, prosecutions, judgement or enforcement activities.

In accordance with Article 28/2 of the Law, personal data subjects may not claim their rights described above with the exception of the right to claim damages in cases where:

- personal data processing is required to prevent or to investigate a crime,
- processing of personal data which have been made public by the personal data subject,
- processing of personal data is necessary by public authorities and professional organizations with public institution status exclusively authorized by the relevant laws for audit or supervision purposes or for disciplinary investigations or prosecutions, or
- personal data processing is necessary to protect the government's economic or financial benefits for budgeting, taxation or financial matters.

Personal data subjects may communicate their requests regarding their rights defined above to the Company by completing the form published at www.db.com.tr and sending the original signed version of the form to *Esentepe Mahallesi, Büyükdere Caddesi, Tekfen Tower No: 209 K: 17-18 Şişli 34394 İstanbul* via a registered letter with signed confirmation of receipt. If the application to the Company is made by a person representing a personal data subject, the representative must present a special power of attorney issued by the personal data subject for this purpose delegating the representative to submit the request to the Company.

Requests duly communicated to the Company will be replied to within thirty days. If fulfilment of the request requires an additional cost, the Company will charge the applicant with the fee included in the tariff to be determined by the Board.

The Company may request information from the applicant to determine whether the applicant is a personal data subject or pose a question to the personal data subject regarding the application in order to clarify the issues included in the application. The Company may reject the application by providing a reason in cases where:

- personal data are processed by means of being anonymized via official statistics for the purposes of research, planning and statistics,
- personal data are processed for artistic, historical, literary or scientific purposes or within the scope of freedom of speech, provided that national defence, national security, public security,

- public order, economic security, right of privacy or personal rights are not breached or no crime is committed,
- personal data are processed within the scope of preventive, protective or intelligence activities conducted by public authorities exclusively authorized for this purpose by law in order to provide national defence, national security, public security, public order or economic security,
- personal data are processed by judicial or enforcement authorities regarding investigations, prosecutions, judgement or enforcement activities,
- personal data processing is required to prevent or to investigate a crime,
- processing of personal data that have been made public by the personal data subject,
- processing of personal data is necessary by public authorities and professional organizations with public institution status exclusively authorized by the relevant laws for audit or supervision purposes or for disciplinary investigations or prosecutions,
- personal data processing is necessary to protect the government's economic or financial benefits for budgeting, taxation or financial matters,
- there is a possibility that request of the personal data subject may prevent or hinder rights and freedoms of others,
- the request requires disproportionate effort to fulfil or
- the information requested is in the public domain.

If the application is rejected, the reply provided is found to be insufficient by the personal data subject or the Company fails to produce a reply within the required time period, the personal data subject may, in accordance with Article 14 of the Law, lodge a complaint at the Board within thirty days of receipt of the Company's reply or, in any event, within sixty days of submission of the request.

4. Security of Personal Data

a. Security Measures

The Company takes the necessary precautions or measures in accordance with Article 12 of the Law to prevent illegal processing of personal data or access to personal data being processed and to protect such data, and performs the required audits or have the same performed within this respect. Please find the precautions and controls implemented by the Company to this effect below:

- Hiring sufficiently qualified personnel to establish and operate the necessary systems in accordance with the principles and legislation regarding processing of personal data,
- Providing training to inform the personnel on personal data, and including provisions regarding protection of personal data in employment contracts and in rules applicable within the Company,
- Using back-up programs compatible with the legislation regarding secure retention of personal data,
- In case a service including personal data processing procedures is outsourced, including provisions into the outsourcing contracts that the vendor will take the necessary security precautions to protect the personal data and to ensure that its own personnel will obey such security precautions,
- Assessing the personal data processing procedures included in the activities conducted by the Company under the data processing conditions regulated by the Law and taking the necessary technical and organizational measures to ensure that these procedures are executed in accordance with the provisions of the Law,
- Identifying the rules to be implemented regarding management of personal data processing procedures and the relevant compliance structure including precautions and controls and applying these rules, and

- Maintaining and auditing personal data processing procedures and systems regarding these procedures with management systems incorporating the necessary technical and organizational characteristics.

b. Audit

The Company performs the audits required or has the same done in accordance with Article 12 of the Law. Results of these audits are reported to the necessary units and departments based on the internal organization of the Company and the necessary actions are taken to improve the precautions taken.

The necessary systems are being established and the relevant training sessions are provided to the employees to ensure that current and new employees of Deutsche Bank's business units become aware of protection of personal data.

c. Management of data protection breaches

The Company has a system in place which ensures that personal data subjects and the Board are informed as soon as possible in case personal data are illegally obtained by others, in accordance with Article 12 of the Law. In case the Board deems it necessary, this may be publicly announced on the Board's website or via another method.

Annex -1 Personal Data Categories

Identity Information	Personal data clearly relating to an individual who has been or may easily be identified and processed via partially or totally automatic means or manually as a part of a data registry system such as driving license, identity card, certificate of residence, passport, attorney's identity card or marriage certificate.
Contact Information	Personal data clearly relating to an individual who has been or may easily be identified and processed via partially or totally automatic means or manually as a part of a data registry system such as telephone number, address or e-mail.
Client Information	Personal data clearly relating to an individual who has been or may easily be identified, processed via partially or totally automatic means or manually as a part of a data registry system and obtained or created regarding the authorized personnel or employees of a client of the Company as a result of Company's commercial activities and related operations of its business units.
Client Transaction Information	Personal data clearly relating to an individual who has been or may easily be identified, included in a data registry system such as records kept regarding client's utilization of Company's products or services or instructions or demands of the client to utilize the said products or services.
Physical Location Security Information	Personal data clearly relating to an individual who has been or may easily be identified, included in a data registry system such as data created during entry into a physical location and records and documents kept during their stay within a physical location.
Transaction Security Information	Personal data clearly relating to an individual who has been or may easily be identified, included in a data registry system such as personal data processed in order to fulfil the Company's technical, administrative, legal and commercial liabilities during execution of commercial operations.
Risk Management Information	Personal data clearly relating to an individual who has been or may easily be identified, included in a data registry system such as personal data processed in order for the Company to manage its commercial, technical and administrative risks via methods that are generally accepted legal and commercial practices in these areas and in accordance with the Deutsche Bank Group Code of Business Conduct and Ethics.
Financial Information	Personal data processed via partially or totally automatic means or manually as a part of a data registry system and relating to an individual who has been or may easily be identified, such as a client's authorized personnel or employee involved in client's financial results and the related information, records and documentation.

Candidate Employee Information	Personal data processed via partially or totally automatic means or manually as a part of a data registry system and clearly relating to an individual who has been or may easily be identified and who has made an employment application to the Company or has been assessed by the Human Resources Department of the Company as a candidate employee based on Company's human resource needs and in accordance with commercial practices and the Deutsche Bank Group's Code of Business Conduct and Ethics.
Legal Transaction and Compliance Information	Personal data clearly relating to an individual who has been or may easily be identified and processed via partially or totally automatic means or manually as a part of a data registry system for the purposes of calculation and monitoring of legal receivables and rights, settlement of debts and other legal obligations of the Company and compliance with the Company's policies.
Special Categories of Personal Data	Personal data clearly relating to an individual who has been or may easily be identified, processed via partially or totally automatic means or manually as a part of a data registry system and stipulated in Article 6 of the Law no. 6698.
Marketing Information	Personal data of a client's authorized personnel or employee, clearly relating to an individual who has been or may easily be identified and processed via partially or totally automatic means or manually as a part of a data registry system, for the purposes of customization and marketing of the Company's products and services in accordance with the utilization habits, likes and needs of the client and reports and assessments created as a result of this processing.

Annex-2 Data Subject Categories

Authorized Personnel/ Employees of the Client	Authorized personnel or employees of Company clients who use or used the products and services offered by the Company.
Authorized Personnel / Employees of a Potential Client	Authorized personnel or employees of a potential client of the Company who has requested to use or shown an interest or who has been assessed to have the potential to show an interest in the products or services offered by the Company.
Visitors	Real persons who have visited the physical locations or websites of the Company with various purposes.
Third persons	Individuals related to the parties defined above in order to provide security of commercial transactions between the Company and the parties above, to protect these parties or to derive benefits (for instance guarantor, companion, family members and close associates)
Candidate Employees	Individuals who have made an employment application to the Company via various means or submitted their CVs and personal information for the review by the Company.
Company's Shareholders	Individuals who are shareholders of the Company
Authorized Personnel of the Company	Board Members and other authorized personnel of the Company
Employees, Shareholders and Authorized Personnel of the Companies with which the Company Co-operates	Individuals who are employees (including without limitation employees of business partners or vendors), shareholders and authorized personnel of the companies with which the Company has entered into any kind of business relationship.