

**YAPI KREDİ FINANCIAL LEASING CORPORATION
PERSONAL DATA PROTECTION AND PROCESSING POLICY**

**YAPI KREDİ FINANCIAL LEASING CORPORATION
PERSONAL DATA PROTECTION AND PROCESSING POLICY
DATA SHEET**

Document Name:

Yapı Kredi Financial Leasing Corporation. Personal Data Protection and Processing Policy

Target Group:

All natural persons other than the employees of Yapı Kredi Financial Leasing Corporation whose personal data are processed by Yapı Kredi Financial Leasing Corporation

Prepared by:

Yapı Kredi Financial Leasing Corporation. Protection of Personal Data Committee

Version:

2]

Approved by:

Has been approved by Yapı Kredi Financial Leasing Corporation Top Management.

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In case of any conflicts between the Turkish version in which the policy has been prepared and any translation thereof, the Turkish version shall prevail.

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1. PART 1 - INTRODUCTION

1.1. INTRODUCTION

Protection of Personal Data is among the priorities of Yapı Kredi Financial Leasing Corporation (the "**Company**"). We have explained the principles adopted in the execution of the personal data processing activities performed by our Company within the framework of this Yapı Kredi Financial Leasing Corporation Personal Data Protection and Processing Policy ("**Policy**") as well as the fundamental principles adopted with regard to the harmony of the data processing activities of our Company with the regulations set forth in the Law on the Protection of Personal Data No. 6698 (the "**Law**") and we have set out detailed information regarding all personal data processing activities conducted by our Company, whereby the data subjects, who are the owners of the personal data are informed and transparency is ensured. With full awareness of our responsibility in this regard, we process and protect your personal data under this Policy.

The activities carried out by our company with regard to protection of personal data of our employees are managed under the Yapı Kredi Financial Leasing Corporation Employees Personal Data Protection and Processing Policy, which was drafted in line with the principles herein.

1.2. SCOPE:

This Policy relates to all personal data of persons other than our Company employees processed by the Company through means that are either automatic or, provided they are part of a data record system, non-automatic. You may find detailed information regarding the persons to which the personal data relate from ANNEX 2 ("*ANNEX 2- Data Subjects*") of this Policy.

1.3. IMPLEMENTATION OF THIS POLICY AND THE RELEVANT LEGISLATION

Relevant legal regulations in force with regard to personal data processing and protection will be implemented with priority. In case of conflict between the legislation in force and the Policy, our Company agrees that the legislation in force will be applicable. The Policy embodies and regulates the rules set forth in the proper legislation per Company practices.

1.4. POLICY'S EFFECT

This Policy, issued by our Company takes effect on 20.12.2021. The version issued by the company and took effect on June 19, 2017 is replaced by this Policy as of its date of effect.

The Policy's effective date shall be updated if the entire Policy or certain items thereof are amended. The policy is put up on the website [www.ykleasing.com.tr] and access is provided to relevant persons upon request thereof.

2. PART 2 - MATTERS REGARDING PROTECTION OF PERSONAL DATA

2.1. SECURING PERSONAL DATA

Our Company takes necessary measures in accordance with the article 12 of the Law in line with the nature of the personal data to prevent the processing, access or transfer of personal data contrary to law or any other security gaps and to ensure their protection. In this regard, our Company takes administrative and other measures to provide the necessary security level and makes or procures the necessary inspections in accordance with the guidelines issued by the Personal Data Protection Board (“**Board**”).

2.2. PROTECTION OF SENSITIVE PERSONAL DATA

Special significance is attached to sensitive personal data under the Law due to the risk of causing persons to suffer in case of unlawful processing or of causing discrimination. Pursuant to Article 6 of the Law, sensitive personal data are defined as race, ethnic origin, political bias, philosophical faith, religion, sect or other beliefs, clothing, membership of association, foundation or trade unions, criminal conviction, security measures, biometric and genetic data (“**sensitive personal data other than health and sexual life**”), health and sexual life data (“**sensitive personal data related to health and sexual life**”).

Technical and administrative measures taken by our Company for the protection of personal data are taken within the scope described in the Sensitive Personal Data Processing and Security Policy under the adequate measures stipulated in the Board’s Resolution No. 2018/10 Dated 31/01/2018 in terms of sensitive personal data and the works conducted in this regard are followed through and inspected under the inspections made in our Company.

Detailed information about processing sensitive personal data are provided in section 3.3 of this Policy.

2.3. INCREASING THE AWARENESS OF AND INSPECTING BUSINESS UNITS WITH REGARD TO PROTECTION AND PROCESSING OF PERSONAL DATA

Our Company ensures the necessary training is provided to business units to increase awareness to protect the data and to prevent unlawful access to data as well as unlawful processing of personal data. The training and awareness works organized by the Company are created based on the “Personal Data Security Guideline” issued by the Board on the official website.

The goal with the training and awareness works is to ensure personal data processing activities carried out while the employees fulfill their work duties are conducted in accordance with the Law and the secondary legislation.

Necessary systems are set up to create awareness on the protection of personal data for the Company's existing employees as well as new recruits and work is carried out with advisors if needed. In this regard, our Company evaluates the attendance to relevant training, seminars and information sessions and organizes new training in line with the updates on the relevant legislation.

3. PART 3 - MATTERS REGARDING THE PROCESSING OF PERSONAL DATA

3.1. PROCESSING PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES LAID DOWN IN THE LEGISLATION

3.1.1. Processing in Accordance with the Rules of Law and Honesty

Personal data are processed in accordance with the general rules of confidence and honesty without impairing the basic rights and freedoms of persons. In this regard, personal data are processed to the extent required for the operations of our Company and within these limitations.

3.1.2. Ensuring Personal Data are Accurate and Up to Date

Our Company takes the necessary measures to ensure personal data are accurate and current while they are being processed and builds the necessary mechanisms to ensure they are accurate and current at certain intervals.

3.1.3. Processing for Specific, Clear and Legitimate Purposes

Our Company clarifies its purposes of processing personal data and carries out the processing pursuant to business operations under purposes that are in connection with these operations.

3.1.4. Being Reasonable, Restricted and Relevant to the Purposes of Being Processed

Our Company collects personal data only to the extent required for business operations and processes them limited to specified purposes.

3.1.5. Maintaining for the Period Laid Down in the Proper Legislation or as Required for the Purpose of Processing

Our Company maintains personal data for the duration necessary for the purpose of processing and for the minimum period stipulated in the proper legal legislation. In this regard, our Company first identifies whether a certain period is stipulated in the legislation for maintaining the personal data, and if there is any such stipulation, it is observed. If there is no legal term, personal data are processed for the duration necessary for the purpose of processing. At the end of the period of maintaining, personal data are destroyed in accordance with periodic destruction periods or the application of the relevant person using the specified destruction methods (deletion and/or destruction and/or anonymization).

3.2. CONDITIONS OF PROCESSING PERSONAL DATA

Except as expressly permitted by the data subject, the basis of the data processing activity may be just one of the following conditions, or several conditions may also be the basis of the same personal data processing activity. If the data processed are sensitive personal data, the conditions set out in 3.3 of this Policy ("Processing of Sensitive Personal Data") will apply.

(i) Data Subject's Express Consent

One of the conditions of processing personal data is the express consent of the data subject. The data subject's express consent must be explained with regard to a certain matter, based on being informed and in free will.

If the following conditions of processing personal data exist, personal data may be processed without requiring express consent of the data subject.

(ii) Being Clearly Required by the Law

If the data subject's personal data are expressly stipulated in the law, that is, if there is express provision in the law for the processing of personal data, said data processing condition applies.

(iii) Failure to Obtain the Express Consent of the Data Subject Because It's Impossible

If it is required to process the personal data to protect the life or bodily integrity of the person or another person in cases where such person is unable to express their consent because it's virtually impossible or where the validity of the person's consent cannot be recognized, the personal data can be processed.

(iv) Being Directly Relevant to the Establishment or Execution of the Agreement

If processing of personal data is necessary provided it is directly relevant to the establishment or execution of an agreement which the data subject is party to, this condition can be deemed to be fulfilled.

(v) The Company's Fulfillment of its Legal Obligation

Data subject's personal data may be processed if required in order for our Company to fulfill its legal obligations.

(vi) The Personal Data Owner Making its Personal Data Public

If the data subject makes its personal data public, the relevant personal data may be processed with limitations for the purpose of making public.

(vii) Data Processing Being Required for the Creation or Protection of a Right

Data subject's personal data may be processed if data processing is required for the creation, exercise or protection of a right.

(viii) Data Processing Being Required for the Legitimate Interests of Our Company

Data subject's personal data may be processed if required for the legitimate interests of our Company provided this does not impair their basic rights and freedoms.

3.3. PROCESSING OF SENSITIVE PERSONAL DATA

Sensitive personal data are processed by our Company in accordance with the principles set out in this Policy using the methods described in the Sensitive Personal Data Processing and Security Policy, taking the administrative and technical measures if the following conditions exist:

- (i) Sensitive personal data other than health and sexual life** may be processed without seeking express consent of the data subject if it is expressly provided for in the law, that is, if there is an express provision in the relevant law with regard to processing of personal data. Otherwise, express consent of the data subject will be obtained.
- (ii) Sensitive personal data related to health and sexual life** may be processed by persons or authorized institutions and organizations who are bound by the obligation of confidentiality for the purpose of protecting public health, preventive medicine, conducting medical diagnosis, treatment and care services, as well as planning and managing health services and financing, without seeking express consent. Otherwise, express consent of the data subject will be obtained.

3.4. MAKING CLARIFICATION TO DATA SUBJECT

Our Company informs data subjects, in line with the 10th article of the Law and the secondary legislation, about the persons who processed their personal data as data controllers, the purposes of processing, the persons they are shared with and the purposes of sharing, the methods of collection, the legal reasons for collection, as well as the rights of data subjects regarding the processing of their personal data.

3.5. TRANSFER OF PERSONAL DATA

Our Company may transfer the data subject's personal data and sensitive data to third parties (third party companies, group companies, third party natural entities) upon taking the necessary security measures pursuant to the purposes of processing personal data that are in line with the law. In this regard, our Company acts in accordance with the regulations set out in the 8th article of the Law. Detailed information on the matter can be obtained via ANNEX 4 ("*ANNEX 4- The Third Parties to Whom Personal Data are Transferred by Our Company and the Purposes of Transfer*") to this Policy.

3.5.1. Transfer of Personal Data to Third Parties Residing in the Country

Even without the express consent of the data subject, if one or several of the following conditions for processing data ("**Conditions for Processing Data**") exist, our Company may transfer personal data to third parties, exercising the necessary care and taking all necessary security measures including the methods stipulated by the Board.

- If the relevant activities regarding transfer of personal data are expressly set out in the law,
- If the transfer of personal data by the Company is directly relevant to and required for the establishment or execution of an agreement,
- If the transfer of personal data is necessary for our Company to fulfill its legal obligation,
- If the personal data are transferred by our Company with limitations for the purpose of making it public, provided they are made public by the data subject,
- If the transfer of personal data by the Company is required for the creation, exercise or protection of the rights of the Company or the data subject or third persons,
- If personal data transfer is required for the legitimate interests of the Company provided this does not impair the data subject's basic rights and freedoms,
- If it is required for the protection of the life or bodily integrity of the person or another person where the person is unable to express their consent because it is impossible or where the person's consent is not legally considered valid.

3.5.2. Transfer of Personal Data to Third Parties Residing Abroad

Transfer of personal data abroad by our Company will be performed as follows depending on whether the receiving country is one of the countries designated by the Board as safe.

If the receiving country is **not** among the safe countries with sufficient protection announced by the Board, personal data may be transferred to third parties abroad if at least one of the Conditions for Processing Data exists and in the following situations in accordance with the fundamental principles specified in article 4 of the Law.

- If the data subject provides express consent,
- If the Company and the data receiver in the relevant country warrant sufficient protection in writing and permission of the Board regarding the transfer is obtained

If the receiving country **is** one of the safe countries with sufficient protection announced by the Board, the personal data may be transferred if any of the Conditions for Processing Data exists.

3.5.3. Transfer of Sensitive Personal Data

Sensitive personal data may be transferred by our Company in accordance with the principles set out in this Policy using the methods described in the Sensitive Personal Data Processing and Security Policy, taking the administrative and technical measures if the following conditions exist:

- (i) **Sensitive personal data other than health and sexual life** may be processed without seeking express consent of the data subject if it is expressly provided for in the law, that is, if there is an express provision in the relevant law with regard to processing of personal data. Otherwise, express consent of the data subject will be obtained.
- (ii) **Sensitive personal data related to health and sexual life** may be processed by persons or authorized institutions and organizations who are bound by the obligation of confidentiality for the purpose of protecting public health, preventive medicine, conducting medical diagnosis, treatment and care services, as well as planning and managing health services and financing, without seeking express consent. Otherwise, express consent of the data subject will be obtained.

4. PART 4 - CATEGORIZATION AND PURPOSE OF PROCESSING OF PERSONAL DATA PROCESSED BY OUR COMPANY

In our Company, personal data are processed in line with the purposes of processing personal data as revealed within the framework of carrying out the operations of our Company, with limitations and based on at least one of the Conditions for Processing Data in accordance with the general principles set out in the Law and notably the principles specified in article 4 of the Law on the processing of personal data. Detailed information regarding the purposes of processing personal data can be found in ANNEX 1 (“*ANNEX 1- Purposes of Processing Personal Data*”) of the Policy.

Categories of personal data processed within the framework of carrying out our business activities and detailed information about those categories are detailed in the Policy’s ANNEX 3 (“*ANNEX 3- Personal Data Categories*”).

5. PART 5 - RETENTION AND DESTRUCTION OF PERSONAL DATA

Our Company maintains personal data for the duration necessary for the purpose of processing and for the minimum period stipulated in the proper legal legislation. Our Company first identifies whether a certain period is stipulated in the legislation for maintaining the personal data, and if there is any such stipulation, it is observed. If there is no legal term, personal data are processed for the duration necessary for the purpose of processing.

The personal data processed by our Company were categorized and maximum data retention periods were established pursuant to the relevant data processing procedure for each personal data category. These periods are set out in the form of a table in our Company’s Personal Data Retention and Destruction Policy. At the end of the maximum period of retention, personal data are destroyed in accordance with periodic destruction periods or the application of the relevant person using the specified destruction methods (deletion and/or destruction and/or anonymization).

6. PART 6- RIGHTS OF DATA SUBJECTS AND EXERCISE OF THOSE RIGHTS

6.1. RIGHTS OF THE DATA SUBJECT

As the owners of personal data, data subjects have the following rights:

- (1) Learn whether their personal data has been processed,
- (2) If his/her personal data have been processed, request information in that regard,
- (3) Learn the purpose of processing the personal data and whether these are used in line with the purpose,

- (4) Know the third parties in Turkey and abroad with whom their personal data were shared,
- (5) Request the correction of their personal data if they are incomplete or incorrectly processed and request that the actions performed within this scope be notified to the third parties to whom their personal data are transferred,
- (6) Request the deletion or destruction of their personal data if the reasons requiring processing are no longer applicable even though they were processed in accordance with the provisions of Law and other respective laws and request that the actions performed within this scope be notified to the third parties to whom their personal data are transferred,
- (7) Object to an unfavorable outcome arising as a result of the analysis of processed data exclusively through automated systems,
- (8) Request indemnification in case of incurring damage due to unlawful processing of personal data.

6.2. EXERCISE OF THE RIGHTS OF THE DATA SUBJECT

Data subjects may submit their requests regarding the rights set out in part 6.1 (“Rights of the Data Subject”) to our Company using the methods determined by the Board. For this purpose, they may use the “Data Subject Application Form”, which can be accessed via the link: www.ykleasing.com.tr .

6.3. REPLIES BY OUR COMPANY TO THE APPLICATIONS

Our Company takes the necessary administrative and technical measures to conclude applications made by the data subject in accordance with the Law and the secondary legislation.

If the data subject duly submits to our Company their request regarding the rights laid down in part 6.1 (“*Rights of the Data Subject*”), our Company will conclude the request free of charge as soon as possible and within 30 (thirty) days at the latest depending on the nature of the request. However, if the procedure requires an additional cost, a fee might be charged pursuant to the rates determined by the Board.

ANNEX 1 – Purposes of Processing Personal Data

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
<p>Conduct works on the communication, social responsibility and satisfaction goals within the framework of the corporate identity of our Company and plan or carry out relevant business processes</p>	Plan or carry out analyses, activities or surveys regarding customer satisfaction and to improve customer experience
	Conduct processes to collect requests, suggestions and opinions through electronic or physical means, evaluate and conclude them
	Carry out corporate communication activities or maintain coordination of the activities
<p>Plan or conduct marketing, campaign or event works and communication activities to provide advantages or convenience for customizing, suggesting or promoting products and services pursuant to the needs, preferences or usage habits of persons</p>	Plan or execute the marketing processes of products or services
<p>Plan, carry out or improve/develop commercial and operational activities under the strategic business goals of our Company</p>	Create software for information systems, conduct software tests and maintenance processes
	Plan, follow up, measure or report the processes with regard to providing support services (maintenance, repair, modification, etc.) and provide the necessary communications to offer those services
	Issue invoices, check, settle, appropriate or cancel
	Carry out and settle finance or accounting works (trial balance, financial statements, etc.)
	Plan or carry out business activities, assign, announce or follow up people in charge of said activities
	Carry out logistics activities
	Carry out retention, archiving and disposal activities
	Manage procurement / renting processes
Secure the company information systems	

	Conduct internal reporting activities
	Secure company product, service, transaction or channel operations
	Carry out activities to protect our Company's financial security and reputation
	Carry out activities to design, develop and manage the systems and programs regarding our Company's business model product, service, channel, system and applications
Planning and conducting process works and activities to let the customers of our Company use the products and services	Plan or realize loan payback monitoring or restructuring activities
	Plan or realize loan usage evaluation pricing or allocation activities
	Carry out activities for client instructions
	Carry out client information activities regarding the products or services used by the client
	Accepting product or service applications and creation or follow-up of sale processes
	Product or service activation, usage, after-sale support and cancelation/closure processes
Carrying out works regarding compliance, risk management and maintaining and sustaining security pursuant to the legislation and the policies/procedures of our Company and planning or conducting relevant workflows	Plan or carry out communication inspection and reporting activities with the main shareholders
	Carry out or inspect assignment of powers and assignment of access to information for our employees or suppliers or support service provider employees
	Carry out legal works and legal service provision
	Identify strategies for running analyses/checks to measure client riskiness or doing follow-up of riskiness
	Carry out our Company's internal/external inspection, examination, investigation or control activities ex officio or upon complaint
	Present information and documents requested under the scope of obligations arising from the legislation to public organizations or make records of answers
	Create, negotiate, revise or sign procurement agreements
	Carry out administrative or legal follow-up processes regarding the receivables of our Company and perform activities for their collection
	Perform the transactions arising from corporate law and partnership law
	Carry out activities to evaluate, put up, follow up or release collaterals

	Ensure data, information or documents are accurate, free from duplicates, complete and up to date
	Carry out legal reporting activities

ANNEX 2 - Data Subjects

PERSONAL DATA OWNER CATEGORIES	DESCRIPTION
Client	Natural entities who use or used the products and services offered by our Company regardless of whether they have any contractual relationship with our Company
Visitor	Natural entities who entered our Company's physical locations for various purposes or who visited our websites
Attendant	Natural entities who attend activities such as organizations, events, etc. held by our Company
Employee Candidates	Natural entities who lodged job applications to our Company through any means or submitted their CVs and relevant information to be examined by our Company (including intern candidates)
Company Official	Our Company's member of board of directors and other authorized natural persons
Employees, Shareholders and Officials of Organizations We Collaborate With	Natural persons who are employed at the organizations that our Company conducts any business relations with (including but not limited to business partners, dealers and suppliers), including shareholders and officials of said organizations

ANNEX 3 - Personal Data Categories

PERSONAL DATA CATEGORIES	DESCRIPTION
Identity Information	Data containing information regarding the person's identity: information such as name - last name, Turkish Id number, nationality, place and date of birth, gender, workplace, registration no, tax no, title and biography, and documents such as driver's license, professional Id, personal ID and passport
Communication Details	Phone number, address, e-mail and fax number
Physical Location Security Information	Personal data regarding the documents and records taken during entry to physical venue and during stay at the physical venue in our Company's location, camera records, records made at the security point, etc.
Transaction Security Information	Your personal data (such as logs) processed in order for us to maintain our technical, administrative, legal and commercial security while conducting our commercial activities
Financial Information	Personal data processed with regard to information, documents and records created according to the type of the legal relation between our Company and the data subject, indicating all kinds of financial results and data such as bank account number, IBAN, debt/receivables, income
Employee Candidate Information	Any personal data processed to obtain information that will form the basis in the evaluation for appropriate positions in the employment of individuals who applied for a job at our Company or who are considered as employee candidates pursuant to the human resources needs of our company under the principles of honesty and commercial practice (Military Service, Education, Marriage Status, References, etc.).
Sensitive Personal Data	Biometric and genetic data and data of persons relating to race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of association, foundation or trade union, health, sexual life, criminal conviction and security measures
Visual and Auditory Data	Photos, videos and audio records
Inspections and Examinations	Personal data processed during internal or external inspections under the scope of compliance with the company policies and legal obligations.
Legal Transaction and Compliance Information	Personal data processed under the scope of compliance with the company policies and legal obligations as well as determination and follow-up of our legal receivables and rights and fulfillment of our debts
Transaction Information	Data such as survey information, cookies, entry-exit records, personal inventory and travel logs obtained per the business operations of our Company

ANNEX 4 - The Third Parties to Whom Personal Data are Transferred by Our Company and the Purposes of Transfer

Our Company may transfer the personal data of its clients to the categories of persons listed below in accordance with articles 8 and 9 of the Law.

- (i) Business / Solution Partners
- (ii) Suppliers
- (iii) Legally Authorized Public Institutions and Organizations
- (iv) Legally Authorized Private Legal Persons
- (v) Koç Holding A.Ş.
- (vi) Koç Group Companies

The scope of the above-mentioned persons to whom transfer is made and the purposes of transferring data are stated below.

Persons to Whom Data May Be Transferred	Definition	Purpose of Transferring Data
Business Partner	Yapı ve Kredi Bankası A.Ş., for the purposes of carrying out the proposal, payment, expense and contract processes in leasing transactions and for registration and providing collateral	With limitation to ensure the purposes of foundation of the business partnership are fulfilled
Supplier	Parties offering services to our Company pursuant to our Company's instructions and purposes of processing data under the scope of conducting our Company's commercial activities	Limited to the purpose of offering the services outsourced by our Company that are necessary for performing the commercial operations of our Company
Legally Authorized Public Institutions and Organizations	Public organizations authorized to obtain information and documents from our Company under the provisions of the proper legislation E.g. BRSA, Central Bank of the Republic of Turkey, Financial Crimes Investigation Board, Ministry of Treasury and Finance, SSI and Turkish Employment Agency	Limited to the purpose requested by the relevant public organizations within their legal powers
Legally Authorized Private Legal Persons	Organizations that were founded in accordance with certain conditions legally identified under proper legislation provisions and maintaining their operations within the legally set framework (such as independent auditors and notaries).	Personal data are shared with limitations on matters that fall under the scope of activities performed by relevant private organizations.
Koç Holding A.Ş.	Koç Holding A.Ş.	Limited to ensuring performance of corporate communication, strategic planning, human resources, commercial and audit activities that require

		participation of Koç Group Companies
Koç Group Companies	<i>(Koç Group Companies are listed in www.koc.com.tr)</i>	With limitation for consideration in the other Koç Group Companies during employment processes upon obtaining express consent of the data subject