

## **DATA PRIVACY NOTICE AND POLICY OF PROTECTION AND PROCESSING OF PERSONAL DATA AND INFORMATION TEXT**

For KfW IPEX-Bank GmbH (“**KfW IPEX-Bank**”) as a data controller, the protection of personal data of its customers, employees and other real persons with whom in connection with have great importance. This Policy and Information Text and other written policies within the KfW IPEX-Bank aim processing and protecting the personal data of our customers, potential customers, employees, employee candidates, visitors, employees of the institution we cooperate with, employees of the KfW IPEX-Bank company community and third parties in accordance with the law.

This notice is made by KfW IPEX-Bank to provide information to its customers, investors, expert vendors, suppliers, real or legal persons with whom in connection with and to determine the principles to be followed in fulfilling the obligations regarding the protection and processing of personal data and to fulfill the obligation to inform other relevant persons within the scope of the Law on the Protection of Personal Data No.6698 ("Turkish Law No.6698").

As KfW IPEX-Bank, in line with our operations, it is important for us to protect the privacy and personal data of those who visit the <https://www.kfw-ipex-bank.de> website ("website"), our customers and potential customers. In accordance with the Turkish Law No.6698, we would like to inform you about the purpose of processing, protecting and processing your personal data, including but not limited to the collection, storage and transfer of your personal data obtained in connection with your use of the website, procurement and service purchases.

### **1. Data Controller**

KfW IPEX-Bank, as the data controller, whose information is given below, is responsible for determining the purposes and means of processing personal data, establishing and managing the data recording system. The website <https://www.kfw-ipex-bank.de> is operated by KfW IPEX-Bank.

KfW IPEX-Bank

Adres: Palmengartenstrasse 5-9, 60325 Frankfurt am Main

Tel: +49 69 74 31- 33 00

### **2. Processing of Personal Data and Personal Data Owners**

Personal data is any information that makes a person specific or identifiable. Examples of personal data are your name, address, e-mail address or telephone number. Information collected through the use of cookies that does not directly enable the identification of your identity, such as how you use the website, can also be qualified as personal data if this information is collected, stored and processed using an identity assigned to the user and therefore personalized. Non-personal data, on the other hand, are information that is only collected together, can be described as big data, summarized,

collected, processed and cannot be associated with a real person because it is made anonymous. You can find more detailed information about cookies in Article 8.

Website users can access most of the information provided without saving their personal information. KfW IPEX-Bank may request personal data from,

- Users while using the website, and
  - Our customers for the purposes explained above,
  - Business partners, and
  - Some personal data can be requested from their representatives
- i. To be able to communicate, especially through the contact form,
  - ii. To process other requests and questions from you,
  - iii. To be able to transfer news bulletins,
  - iv. To be able to test and optimize demand analysis processes in order to develop a direct approach to customers,
  - v. Conducting advertising or marketing activities and researching opinions,
  - vi. To develop services and products in the future and to be able to measure business management,
  - vii. To develop claims and defenses in case of legal disputes,
  - viii. Investigating and preventing criminal acts,
  - ix. Carrying out risk management processes in KfW IPEX-Bank and group companies,
  - x. To use social media,

Personal data is processed by our company with the aims of;

- Execution of Contract Processes
- Execution of Customer Relationship Management Processes
- Execution of Finance and Accounting Affairs
- Conducting Activities in Compliance with Legislation
- Conducting Communication Activities
- Providing better service to internet users who use the website
- It is processed for providing feedback to users and customers and similar purposes.

### **3. Transfer of Personal Data to Third Parties**

People who have access to your data within our company, access your data in order to fulfill our contractual and legal obligations. However, we can share your personal data with the suppliers in line with the issues we have mentioned above.

Data sharing with people outside our company can only be done if our company is legally obliged to do so or if you have your consent in this regard.

We can submit your personal data to the inspection of legally authorized public institutions and organizations, limited to the scope of the requests with the activities of KfW IPEX-Bank, obtaining import and project finance, financing of development projects, in accordance with the conditions specified in the legislation in order to comply with our company's policies.

#### **4. Transfer of Personal Data to Abroad**

Your personal data will be provided to our customers for the necessary financing of the relevant projects, for the relevant market research and opinions of our company in order to improve the services we offer, for designing our company's financing strategies, for compliance with our company's policies and other related purposes, in accordance with the conditions specified in the legislation, to the companies that our company is in cooperation with especially in the European Union countries, to the service providers we work with and the third parties with whom we benefit from or cooperate with the services such as market research companies.

#### **5. Purpose and Legislative Background of Data Collection**

Your personal data can be collected by KfW IPEX-Bank with your express consent through written or electronic channels, including but not limited to those listed here:

- Website,
- Various contracts,
- Contact forms, and

This information is collected in order to execute the subject of the company and our administrative activities within the scope of the relevant law and to ensure that our company can maintain its commercial life and fulfill its liabilities arising from the law completely and correctly. Data about our current and potential internet users are collected partially or completely by automatic or non-automatic means, as required by our business, for contractual or other reasons determined within the framework of legislation.

Although the legal reasons for obtaining the personal data of the relevant persons vary in each case, these reasons are listed as follows in Article 5 of the Turkish Law No.6698:

- If there is explicit consent of the data subject
- If it is expressly provided for by the laws
- If it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- If processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.

- If it is necessary for compliance with a legal obligation to which the data controller is subject.
- If personal data have been made public by the data subject himself/herself.
- If data processing is necessary for the establishment, exercise or protection of any right.
- If processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

## **6. Re Your Data Processed by KfW IPEX-Bank for Data Processing Purposes**

Contact information and the information shared by you regarding news bulletins constitute the first step to establish a contractual relationship between you and KfW IPEX-Bank. Although you have no legislative obligation in this regard, it is not possible for us to establish the necessary communication with you without this information. Therefore, in order to establish a contractual relationship, your personal data that you have shared with us is processed.

The data to be processed within the scope of advertising and marketing purposes by analyzing the behavior of customers are processed so that KfW IPEX-Bank can control and direct its activities as a financial institution.

The data you have shared with us, which will be processed within the scope of risk management and compliance studies, are processed for the purpose of ensuring the security of our computer and electronic systems, and to intervene in case of any breach.

## **7. Use of Social Plugins by Social Media Sites**

You can access our social media channels (Facebook, YouTube, LinkedIn, Xing, Google+ and Twitter) on the KfW IPEX-Bank website.

- Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA  
[Facebook privacy policy](#)  
[Instagram privacy policy](#)
- Twitter, Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA  
[Twitter Privacy Policy](#)
- Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA  
[Google privacy policy \(YouTube\)](#)
- LinkedIn Ireland, 70 Sir John Rogerson's Quay, Dublin 2, Ireland  
[LinkedIn privacy policy](#)
- XING AG, Dammtorstraße 30, 20354 Hamburg, Deutschland  
[Xing privacy policy](#)
- Shorthand Pty Ltd.  
[Shorthand privacy policy](#)

When choosing one of the above links, you will leave our website and be directed to the website of a social medium. Any information possibly available there has been created without any involvement on our part and we are therefore not responsible for such information. We do not assume any liability for such information being up to date, accurate and/or complete. References to social media do not imply any approval on our part.

Particularly for reasons of data protection compliance, the relevant social media cannot be directly accessed. Corresponding notices will therefore be displayed. In addition, you may first have to click on integrated buttons, thus giving your express consent to the communication with the social medium. Only after that, the browser will connect you by establishing a direct connection with the servers of the social medium.

Please note that we ourselves have no definite information and no influence on how and what data are transferred to the social medium.

By activating the button, you will provide the social medium with the information that you have opened one of the web pages of the medium on the internet. In case you are already registered with the social medium, it will be able to link your visit with your account with the social medium. But even if you have not yet registered with the social medium, it cannot be excluded that, after clicking on the medium, it will collect and/or store your IP address.

## **8. Cookies**

Your data is collected in order to continuously improve our website and to analyze the content of our website and then stored anonymously. Cookies are small text files transmitted to your computer's hard drive by the web page server, sending certain information to the person who set them. Through cookies, some data such as IP address, browser information, device information, and website visitor behavior can be obtained automatically. Cookies cannot be used to run programs or deliver viruses to your computer. Due to the information contained in cookies, it can enable you to view our websites correctly.

When you first enter to our website, you will see a tool that asks for your consent for the processing of the cookies. Under "Change settings" in that tool, you can decide which cookies you want to allow. You can change your cookie settings at any time and manage the use of cookies in your browser settings and control cookies through other tools. Some of the cookies are essential for the website's core functionality, thus, deactivation of these cookies is not available. You can opt-out the statistics cookies that we use to conduct analyses of user behavior.

The statistics cookies that we use on our website to conduct analyses of user behavior store your information by anonymizing it. Therefore, the relevant data cannot be used in any way to identify the visitor and cannot be associated with data regarding the owner of the anonymous data.

## **9. Your Rights Regarding Your Personal Data**

We would like to remind you that in accordance with the legislation regarding your personal data we process, you have the following rights:

- To learn whether your personal data are processed or not,
- To demand for information as to if your personal data have been processed,
- To learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- To know the third parties to whom your personal data are transferred in country or abroad,
- To request the rectification of the incomplete or inaccurate data, if any,
- To request the erasure or destruction of your personal data,
- In case personal data are processed incompletely or inaccurately, to request reporting the correction and / or deletion or destruction of personal data have been transferred to third parties to whom personal data are transferred,
- To object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
- To claim compensation for the damage arising from the unlawful processing of his/her personal data.

## **10. Use of Rights, Application and Contact**

If you want to use your above-mentioned rights within the scope of KVKK, you can send your requests to KfW IPEX-Bank to our e-mail address [info@kfw-ipex-bank.de](mailto:info@kfw-ipex-bank.de) provided that your identity is verified.

Your requests in your application will be concluded free of charge within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost for KfW IPEX-Bank, the fee may be charged in the tariff determined by the Personal Data Protection Board in the Communiqué on Application Procedures and Principles for the Data Controller.

## **11. Data Security**

KfW IPEX-Bank has taken technical and administrative measures to prevent unlawful processing of personal data, to prevent unlawful access to personal data, and to preserve personal data, within the scope of KVKK. To the extent possible, for the purpose of processing and / or preventing the sharing of such data with third parties except for the processing for personal purposes or reasons by those who are authorized to access personal data based on their position or duty, by exceeding their authority and / or abusing their authority, necessary technical and administrative measures have been taken.

## **12. Links to Other Websites**

The website may contain links to other websites. We would like to remind you that we are not aware of whether the operators of these sites act in accordance with the legislation

on the protection of personal data and that we do not undertake to protect your data. KfW IPEX-Bank is not responsible for the content of other websites linked on the website and has no authority to interfere with the content of websites to which it provides links.

**13. Amendments to the Information Text Regarding Data Privacy Notice and Policy of Protection and Processing of Personal Data**

This "Data Privacy Notice and Information Text on Policy of Protection and Processing of Personal Data Policy" will be amended when necessary in order to announce changes in our services related to data protection, to provide new services and to fulfill the applicable legal requirements.