
CONFIDENTIALITY POLICY

Article 136 of Turkish Penal Code that is titled “Unlawful giving or obtaining data” includes a provision that reads, “Any person who unlawfully gives personal data to others, and disseminates or obtains them, will be punished with imprisonment of one to four years” and; subparagraph 2 of Article 26 that is titled “Exercise of the right and the consent of the concerned person” includes a provision that reads, “Nobody will be punished for any action committed with the expressed consent of the person, who is the owner of such absolute right which such person can dispose of”.

Our employees must definitely observe the professional confidentiality principles that are laid down by legislation. Pursuant to the 3rd paragraph of Article 73 of Banking Law 5411, the employees, who by virtue of their title and duty learn the secrets that belong to the Bank’s legal entity or to the customers, cannot disclose them to those other than the authorities that are expressly empowered regarding them. In this context, all personnel is under the obligation not to disclose the confidential information that is associated with the customers, activities and transactions of the legal entities of the Corporation, to anybody other than the official authorities specifically listed in the laws, and the employees of the authorized Corporation.

According to this “CONFIDENTIALITY POLICY”, the responsibilities of the employees regarding the confidential information they had learned will continue as per the pertinent provisions of the Law, even if they leave their job.

The only exception to this is the case where the customer gives its written permission to the Bank, to have the secret that belongs to itself disclosed, by expressly stating the limits.

Our employees who – during the activities within the Corporation and when exercising their duties – learn company information that have not been disclosed to the public, cannot reveal them to the persons other than those who have to learn them, and neither can they use them for their own investments.

“Confidential information” includes the information that belongs to the Corporation, and which our employees have read or heard by virtue of their duty, and which belongs to the existing and prospective customers, and not to the public; any information that can define that person or organization, and that can include sensitive personal information and; the information which belong to the Corporation.

Our Bank ensures compliance of the organizations from which it receives support services, with the confidentiality standards and conditions of our Bank.

The measures to carefully keep and save the information and to ensure that they are not disclosed are taken as per the “Acceptable Usage of Information Systems Standards” of the Bank.