

Türkiye Wealth Fund Management Inc.

Privacy Policy

Web Site : <https://www.tvf.com.tr>
Phone Number : +90 212 326 39 00
E-Mail : kvkk_bildirim@tvf.com.tr
Address : Muallim Naci Caddesi, No:22, Ortaköy/İstanbul

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

What Type of Information We Collect?

We, Türkiye Wealth Fund Management Inc. (TWF), process your personal data in accordance with the general principles stipulated in Article 4 of the Personal Data Protection Law (“**PDPL**”) and Article 5 of the General Data Protection Regulation (“**GDPR**”) within the scope of the activities we carry out as a controller. The personal data we process are as follows;

- Your ID information (*Name, surname, trade name for sole proprietorship, signature/signature circular, ID number, passport information, gender, birth date*),
- Your contact information (*Phone number, e-mail, work address and residence address, phone call information*),
- Your professional experience (*position/title, unit of work, institution/company of work, CV, education information*),
- Your financial information (*Bank account/IBAN information, amount information, billing information, execution/debt information*),
- Your legal transaction information (*Information contained in documents created/requested by judicial authorities, personal data in case-executive files*),
- Your request and complaint information

How Do We Collect Your Information?

We collect your information,

- By automated means through the <https://www.tvf.com.tr> web site and the forms on this site,
- Partially automated means via Presidency's Communication Centre,
- Non-automated and partially automated means through lawsuit/execution files and notifications,
- By non-automated means with the documents you have sent to us,
- Non-automated and partially automated means from relevant public authorities,
- Non-automated and partially automated means from our affiliate companies,
- Partially automated means via e-mail,
- By non-automated means via verbally,
- By non-automated means through documents physically sent to us,
- Partially automated and non-automated means through the applications made,
- By non-automated means via contracts.

Why We Process Your Personal Data and What Is Our Lawful Basis About Processing?

The data processing conditions stipulated within the scope of PDPL are as follows (a. means article);

- Explicit consent (“a.5/1, a.6”).
- It is expressly provided for by the laws (“a.5/2-a, a.6/3”).
- 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. (“a.5/2-b”).
- 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 (“a.5/2-c”).
- It is necessary for compliance with a legal obligation to which the data controller is subject (“a.5/2-ç”).
- Personal data have been made public by the data subject himself/herself (“a.5/2-d”).
- Data processing is necessary for the establishment, exercise or protection of any right (“a.5/2-e”).
- 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 (“a.5/2-f”).

The data processing conditions stipulated within the scope of GDPR are as follows (a. means article);

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes (“a.6/1-a”),
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (“a.6/1-b”),
- Processing is necessary for compliance with a legal obligation to which the controller is subject (“a.6/1-c”),

- Processing is necessary in order to protect the vital interests of the data subject or of another natural person (“a.6/1-d”),
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (“a.6/1-e”),
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (“a.6/1-f”),

We request your personal data from you in accordance with the following purposes:

- **Your ID information,**
 - To verify your identity,
 - (PDPL, a.5/2-ç, a.5/2-f) – (GDPR, a.6/1-c, a.6/1-f),
 - To carry out and supervise business activities,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f),
 - In order to communicate with you,
 - (PDPL, a.5/2-c, a.5/2-ç, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-c, a.6/1-f),
 - In order to make payments,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to fulfil our legal obligations,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - To follow the legal and judicial processes,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - In order to carry out contract processes,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to carry out the billing processes,
 - (PDPL, a.5/2-ç) – (GDPR, a.6/1-c),
 - For the creation of current account cards and current account reconciliations,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to carry out the request and complaint processes,
 - (PDPL, a.5/2-f) – (GDPR, a.6/1-f)
- **Your contact information,**
 - To carry out and supervise business activities,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f),
 - In order to communicate with you,
 - (PDPL, a.5/2-c, a.5/2-ç, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-c, a.6/1-f),
 - In order to fulfil our legal obligations,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - To follow the legal and judicial processes,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - In order to carry out contract processes,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to carry out the billing processes,
 - (PDPL, a.5/2-ç) – (GDPR, a.6/1-c),
 - For the creation of current account cards and current account reconciliations,

- (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to carry out the request and complaint processes,
 - (PDPL, a.5/2-f) – (GDPR, a.6/1-f)
- **Your professional experience,**
 - To carry out and supervise business activities,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f),
 - In order to communicate with you,
 - (PDPL, a.5/2-c, a.5/2-ç, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-c, a.6/1-f),
 - In order to carry out contract processes,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - To follow the legal and judicial processes,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
- **Your financial information,**
 - To carry out and supervise business activities,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f),
 - In order to make payments,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - To follow the legal and judicial processes,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - In order to carry out contract processes,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to carry out the billing processes,
 - (PDPL, a.5/2-ç) – (GDPR, a.6/1-c),
 - For the creation of current account cards and current account reconciliations,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
- **Your legal transaction information,**
 - To carry out and supervise business activities,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f),
 - In order to fulfil our legal obligations,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - To follow the legal and judicial processes,
 - (PDPL, a.5/2-a, a.5/2-ç, a.5/2-e) – (GDPR, a.6/1-c),
 - In order to carry out contract processes,
 - (PDPL, a.5/2-c, a.5/2-f) – (GDPR, a.6/1-b, a.6/1-f)
 - In order to carry out the billing processes,
 - (PDPL, a.5/2-ç) – (GDPR, a.6/1-c),
- **Your request/complaint information,**
 - In order to carry out the request and complaint processes,
 - (PDPL, a.5/2-f) – (GDPR, a.6/1-f)

The data processing conditions we rely on while processing this data are indicated in parentheses.

Data Sharing

We may share your personal data with the following individuals and institutions;

- Courts and authorized public institutions and organizations in order to follow the legal and judicial processes,
- Authorized public institutions and organizations in order to fulfil our legal obligations,
- Banks in Turkey or abroad, if necessary, for the purpose of carrying out payment processes,
- Law offices, in order to carry out legal processes,
- Related affiliate company in order to carry out the request and complaint processes,
- Independent auditors in order to carry out audit processes,
- Related subsidiary company in order to carry out the request and complaint processes,
- Relevant suppliers for the purpose of conducting and auditing business activities,
- Addressee natural and legal persons for the purpose of carrying out communication activities,

Except for the specified third parties, we do not share personal data with unrelated and unauthorized third parties.

Storage and Deletion of Personal Data

As TWF, we process and store your personal data in accordance with general principles of PDPL and GDPR. We take all kinds of technical and administrative measures for the security of your personal data and we control the compliance of the third parties to whom we transfer your data to these measures.

We store your personal data by considering the purpose and reason for processing, the period required by the relevant legislation and our legal obligations. According to the specified criteria, if we no longer need your personal data and we are not legally obliged to keep it, we delete your personal data in question.

Your rights in relation to this processing (PDPL)

As an individual you have certain rights regarding our processing of your personal data. Under PDPL, you have rights including:

- to learn whether his/her personal data are processed or not,
- to demand for information as to if his/her personal data have been processed,
- to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- to know the third parties to whom his 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 his/her personal data under the conditions referred to in PDPL Article 7,
- to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom his/her personal data have been 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.

And also you can withdraw your consent any time.

Your rights in relation to this processing (GDPR)

As an individual you have certain rights regarding our processing of your personal data. Under GDPR, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances (where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.). You also have the right to object where we are processing your personal information for direct marketing purposes.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organization, or to you, in certain circumstances.

And also you can withdraw your consent any time.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

How to complain

You can also complain to the Personal Data Protection Board (PDPB) if you are unhappy with how we have used your data.

The PDPB's address: Nasuh Akar Mahallesi 1407. Sok. No:4, 06520 Çankaya/Ankara, www.kvkk.gov.tr