

DUBAI INTERNATIONAL FINANCIAL CENTRE**PRIVACY STATEMENT****25 June 2025**

This Privacy Statement dated 25 June 2025 explains in a simple and transparent way how Türkiye Vakıflar Bankası T.A.O (DIFC Branch). (in this Privacy Statement, “us”, “we” and “our”) collects, uses and discloses your personal data, and your rights in relation to the personal data we hold.

We are the data controller of your personal data and are subject to the DIFC Data Protection Law (DIFC Law no 5 of 2020) and DIFC Data Protection Regulations (hereafter referred to as the “Data Protection Law”).

1. Scope of this Privacy Statement

This Privacy Statement applies to the following individuals (“you”):

- Our past, present and prospective customers;
- Anyone involved in any transaction or interaction with us, whether it is in your personal capacity or as a representative of a legal entity (for example, director, a company manager, agent, legal representative, operational staff, other authorized representative, etc.);
- Suppliers and third parties; and
- Prospective employees.

2. How do we obtain your personal data?

We obtain your personal data as follows:

- From the information you provide to us when you meet or interact with us;
- From information about you provided to us by your company or an authorized intermediary;
- When you communicate with us by telephone, email, web form or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- When you complete client application or other forms;
- From your agents, advisers, and intermediaries; or
- From publicly available sources or from third parties, most commonly where we need to conduct background checks about you.

3. What types of personal data do we process?

We collect the following categories of personal data about you:

- Your name and contact information such as your home or business address, email address, telephone number and contact details;
- Biographical information which may confirm your identity including your date and place of birth, your passport number or national identity card and visa details, country of domicile and/or your nationality;
- Information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as your bank account details;
- Information about your knowledge and experience in the investment field;
- An understanding of your goals and objectives in procuring our services;
- Information about your employment, education, family or personal circumstances, and interests, where relevant;
- Know our customer data as part of customer due diligence and to prevent fraudulent conduct or behavior that contravenes sanctions and to comply with regulations against money laundering, terrorist financing and tax fraud and

- Where applicable and legally permissible audio-visual data such as surveillance videos, recording of phone or video calls or chats with our employees or offices.

Special categories of personal data are data relating to your religious beliefs or criminal records.

We may process your special categories of personal data if:

- We have your explicit consent to do so;
- Processing is necessary for the purpose of recruitment, visa or work permit processing;
- We are required or allowed to do so by applicable local law; or
- It is necessary to comply with the law applicable to us in relation to anti-money laundering or counter-terrorist financing obligations or the prevention, detection, or prosecution of any crime.

4. What do we do with your personal data?

Processing means every activity that can be carried out in connection with personal data such as collecting, recording, storing, adjusting, organizing, using, disclosing, transferring or deleting it in accordance with applicable laws.

We only use your personal data under one of the following legal grounds:

- To conclude and carry out a contract with you;
- To comply with our legal obligations;
- For our legitimate business interests. This data processing may be necessary to maintain good commercial relations with all our customers and other concerned parties. We may also process your data to prevent and combat fraud and to maintain the security of your transactions and of the operations made by us;
- When we have your consent. In this case, you may withdraw your consent at any time.

We may process your data for the following purposes:

Administration

For example, when you wish to become our Group's customer we are legally obliged to collect personal data that verifies your identity (such as a copy of your ID card or passport) and to assess whether we can accept you as a customer. We also need to know your postal, e-mail address or phone number to contact you.

In the case of prospective employees, we will use information about you to make decisions in relation to your recruitment or appointment. Also, to determine the terms on which you may work for us and your legal entitlement to work in the UAE and DIFC.

For our legitimate interest to provide company updates, provide marketing material, notify of changes to service terms and peruse potential candidates for employment opportunities.

Performance of agreement to which you are a party or taking steps prior to entering into agreements

We use information about you when you enter into an agreement with us or when we have to contact you. We analyze information about you to assess whether you are eligible for our products and services.

In relation to third parties and suppliers, we may use your information to enter into an agreement, and to maintain and improve our working relationship. For example, to facilitate payment, verify your details, and send administrative messages, whether information or required by applicable law.

Relationship management and marketing

We may ask you for feedback about our products and services, or record your conversations with us online, by telephone or in our office. We may share this with certain members of our staff to improve our offering or to customize products and services for you. If you don't wish to receive these offers you have the right to object or to withdraw your consent by sending an email or telephoning us (see section "Our Contact Details" below).

Safety and security

We have a duty to protect your personal data and to prevent, detect and contain any breaches of your data. This includes personal data we are obliged to collect about you, for example to verify your identity when you become a customer.

Compliance with legal obligations to which we are subject

We process your data to comply with a range of legal obligations and statutory requirements.

5. With whom do we share your personal data and for which reasons?

To provide you with our services, we share certain personal data externally with third parties.

Whenever we share your personal data externally with third parties in countries without a deemed adequate level of protection for personal data, we ensure the necessary safeguards are in place to protect it. We rely hereby upon, amongst others:

- The conclusion or the execution of an agreement in your favor;
- Requirements based on applicable local laws and regulations;
- When applicable, we use standardized contractual clauses in agreement with service providers to ensure personal data transferred to countries without an adequate level of protection for personal data comply with the DIFC Data Protection Law or GDPR, as applicable.
- Your explicit consent;
- International treaties that protects personal data transferred to certain service providers abroad.

When we use other service providers or third parties to carry out certain activities in the normal course of business, we may have to share personal data required for a particular task. The service providers include:

- IT service providers who may provide application or infrastructure (such as cloud) services;
- Marketing activities or events and managing customer communications;
- Preparing reports and statistics, printing materials and designing products;
- Placing advertisements on apps, websites and social media;
- Legal, auditing or other special services provided by lawyers, notaries, trustees, company auditors or other professional advisors;
- Identifying, investigating or preventing fraud or other misconduct by specialized companies.

6. What are your rights and how do we respect them?

We respect your individual rights to determine how your personal data is used. These rights include:

Right to access information

You have the right to ask us for an overview of your personal data that we process.

Right of rectification

If your personal data is incorrect, you have the right to request us to rectify it. If we shared data about you with a third party and that data is later corrected, we will also notify that party accordingly.

Right to object processing

You can object us using your personal data for our own legitimate interests (for example, marketing). We will consider your objection and stop processing your data unless we assess that we have legitimate and imperious reasons that justify processing your data.

You can also object to receiving commercial messages from us (by e-mail, mail and phone) or for statistical purposes. When you become our customer, we may ask you whether you want to receive personalized offers. Should you later change your mind, you can choose to opt out of receiving these messages by sending an email to us (see section "Our contact details" below).

Right to restrict processing

You have the right to ask us to restrict using your personal data for the period necessary to us for our verifications if:

- You believe the information is inaccurate;
- we are processing your personal data unlawfully;
- you have objected to us processing your personal data for our own legitimate interests;
- you have the same right if we no longer need your personal data, but you want us to keep it for use in a legal claim.

Right to data portability

You have the right to ask us to transfer some of your personal data directly to you or to another company. This applies to personal data we process by electronic means and with your consent or because of a contract with you. Where technically feasible, we will transfer your personal data.

Right to erasure (also known as right to be forgotten)

Unless required by law, you may ask us to erase your personal data if:

- We no longer need it for its original purpose;
- You withdraw your consent for processing it;
- You object to us processing your data for our own legitimate interests (except for legitimate and compelling interests) or for commercial messages; or
- we unlawfully process your personal data.

Right to complain

Should you not be satisfied with the way we have responded to your concerns you have the right to submit a complaint to us. If you are still unhappy with our reaction to your complaint, you can escalate it to our Group Compliance Department email. You can also contact the DIFC Protection Commissioner (DIFC the Gate, Level 14, PO Box 74777, Dubai, T.: +971 4 362 2600)

Exercising your rights

You can also exercise your rights by contacting us (see section "Our contact details" below).

We aim to respond to your request as quickly as possible. In some instances, this could take up to one month. Should we require more time to complete your request, we will let you know how much longer we need and provide reasons for the delay. In certain legal cases, we may deny your request. If it's legally permitted, we will let you know in due course why we denied it.

7. Are you obliged to provide us with your personal data?

In some cases, we are legally required to collect personal data, or your personal data may be needed before we may perform certain services and provide certain products. We undertake to request only the personal data that is strictly necessary for the relevant purpose. Failure to provide the necessary personal data may cause delays or lead to refusal of certain products and services.

8. How do we protect your personal data?

We take appropriate technical and organizational measures (policies, procedures, IT security, etc.) to ensure the confidentiality and integrity of your personal data and the way it's processed. We apply an internal framework of policies and minimum standards across our business to keep your personal data safe. These policies and standards are periodically updated to keep them up to date with regulations and market developments.

In addition, our employees are subject to confidentiality obligations and may not disclose your personal data unlawfully or unnecessarily. To help us continue to protect your personal data, you should always contact us if you suspect that your personal data may have been compromised.

9. How long do we keep your personal data?

We will only retain your personal data for as long as we have a lawful reason to do so. In particular:

- where we have collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will retain that personal data for six years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings; or
- otherwise, we will in most cases retain your personal data for a period of six years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you as per our Group policy.

When your personal data is no longer necessary for a process or activity for which it was originally collected, we delete it, or bundle data at a certain abstraction level, render it anonymous and dispose it in accordance with the applicable laws and regulations.

10. Changes to this Privacy Statement

We may amend this Privacy Statement to remain compliant with any changes in law or to reflect how our business processes personal data. This version was created and published at the end of 25 June 2025 and enters into force on 25 June 2025. The most recent version is available on our website www.vakifbank.ae.

11. Our contact details

You can address your queries regarding this Privacy Statement to:

Türkiye Vakıflar Bankası T.A.O. (DIFC Branch)
Unit 9B, Level 6, Gate District 4, DIFC, Dubai, United Arab Emirates
Phone : +971 4 552 4614
Email: difc.branch@vakifbank.com.tr

You can also address your queries or complaints to our Group data protection officer:

Akif Mert AVCI
Finanskent, Finans Cd No:40 D:1, 34760 Ümraniye/İstanbul
Phone: +90 (216) 724 33 33
Email : AkifMert.AVCI@vakifbank.com.tr