

## INFORMATION NOTICE ON PROCESSING OF PERSONAL DATA IN PERSONAL ACCIDENT INSURANCE

### Information About the Data Controller

**Trade Name:** Katılım Emeklilik ve Hayat A.Ş.

**Address:** Saray Mahallesi Dr. Adnan Büyükdeniz Caddesi No: 2 Akkom Ofis Park 3. Blok Kat: 2 Ümraniye/İstanbul

**Tel-Fax:** 2169998100 - 2166921122

**Trade Registration No:** 895027-0

**Tax ID No:** 5280641047

**MERSIS No:** 0528064104700018

Katılım Emeklilik ve Hayat A.Ş., as the data controller, takes all measures and practices due diligence to prevent illegal usage of your personal data, to provide storage and provide proper safety level according to the legislation during the processing of your personal data pursuant to Personal Data Protection Law Nr. 6698 (the “**Law**”) and subsidiary regulations (“**PDP Legislation**”).

This Information Notice is prepared by Katılım Emeklilik ve Hayat A.Ş., as the data controller, to fulfill the information liability arising from PDP legislation.

### 1) Your Personal Data We May Process, Purpose of Processing, and Legal Reasons:

Your personal data that we, as Katılım Emeklilik ve Hayat A.Ş., process within the scope of the Personal Accident Insurance are as follows:

- Identity, contact, profession and title information, bank account information, payment information, income range information, customer and transaction information, created contract information, signature, visual and audio records, and the personal data contained in the information and documents generated in case of a legal dispute and/or proceeding (hereinafter referred to as “Personal Data”), and
- Health information, criminal conviction, and security measures (hereinafter referred to as “**Personal Data of Special Nature**”).

#### “Your Personal Data”:

a) may be processed for preparation of insurance proposal; approval, refusal, preparation, renewal of the policy; determination of premiums and coverage; performance and management of risk analysis; exercising the rights arising from the policy and fulfillment of obligations; provision of assistance services; collecting the premiums; refunding the premiums; evaluation of indemnification claims; covering the expenses of the insured and paying the indemnity; due to legal reasons that data processing is necessary for contractual parties, provided that this processing is directly related to execution and performance of the insurance agreement pursuant to subparagraph (c) of paragraph 2 of Article 5 of the Law.

b) may be processed for fulfilling the liabilities arising from applicable legislation, including but not limited to Insurance Law Numbered 5684, Turkish Commercial Code Numbered 6102, the Prevention of Laundering Proceeds of Crime Law Numbered 5549, and the Prevention of Money Laundering Law Numbered 4208, Insurance Information and Monitoring Center, Insurance Agencies Regulation, Insurance Information and Monitoring Center Regulation, Regulation on Insurance and Individual Pension Activities within the Scope of Participation Principles, General Conditions of Personal Accident Insurance; detecting the information of transaction holders; authentication of identities; creation, arrangement and storage of all records and documents that are the basis of transactions carried out in physical or electronic environment (call center, website, mobile branch application); informing and making notifications about insurance agreement; fulfilling the reporting and informing obligations; fulfilling the obligations to keep information and documents; evaluation of requests and complaints; execution of all legal processes and transactions before judicial and administrative authorities, enforcement offices, consumer arbitration committees, alternative dispute resolution authorities, and other official authorities; due to the fact that it is clearly stipulated in the provisions of the Law pursuant to subparagraph (a) of the 2nd paragraph of Article 5 of the Law, and it is legally required for the data controller to fulfill its legal obligation pursuant to subparagraph (c) of Law,

c) may be processed for managing the information exchange with companies that receive services within the scope of confidentiality agreement within the scope of the audit, information security, and archive activities; managing the insurance, reinsurance, and coinsurance processes; Managing the information exchange with the companies and suppliers that receive service within the scope of call center, technical examination and control, product and tariff preparation, medical consultancy activities pursuant to the Support Services Regulation; due to legal reasons that data processing is mandatory for the legitimate interests pursued by the data controller, provided that this processing does not violate the fundamental rights and freedom of the data subject pursuant to subparagraph (f) of paragraph 2 of Article 5 of the Law,

d) may be processed for providing information about our products and services; planning special products/services/offers; performing statistical activities; informing you about customer satisfaction surveys, advantages, or campaigns; providing communication for promotion, marketing, and sales; and sending you commercial electronic messages; provided that your “explicit consent” is obtained pursuant to 1st paragraph of Article 5 of the Law,

e) and your personal data of special nature related to health information may be processed for risk assessment in preparation for the offer,

evaluation of the indemnification claims, and execution of the indemnification process within the scope of the personal accident insurance agreements; fulfilling the liabilities arising from applicable legislation; creation, arrangement, and storage of all records and documents that are the basis of transactions carried out in physical or electronic environment (call center, website, mobile branch application); informing and making notifications about insurance agreement; fulfilling the reporting and informing obligations; evaluation of requests and complaints; execution of all legal processes and transactions before judicial and administrative authorities, and other official authorities, provided that your “explicit consent” is obtained pursuant to 2nd paragraph of Article 6 of the Law,

f) and your personal data of special nature related to criminal conviction and security measures information may be processed within the scope of the Prevention of Laundering Proceeds of Crime Law Numbered 5549, Prevention of Money Laundering Law Numbered 4208, limited to the “cases stipulated in laws” pursuant to 3rd paragraph of Article 6 of Law; and at indemnification phase, if necessary, for detecting whether the indemnity payment will be made or not, provided that your “explicit consent” is obtained pursuant to 2nd paragraph of Article 6 of the Law.

## **2) The Persons/Entities Transfer Your Personal Data to, and the Purpose of Transfer:**

• Your Personal Data and Personal Data of Special Nature may be transferred by our Company, to the extent permitted and required by law, to relevant public and health institutions, health institutions and organizations affiliated to the Ministry of Health, the Revenue Administration, the judicial authorities, lawyers affiliated to us with power of attorney, the physicians we receive medical consultancy services, alternative dispute resolution authorities, the Republic of Turkey, Ministry of Treasury and Finance, Insurance and Private Pension Regulation and Supervision Authority, Capital Markets Board, the Insurance Information and Monitoring Center (SBM), Financial Crimes Investigation Board (MASAK), Association of the Insurance, Reinsurance and Pension Companies of Turkey, judicial authorities, execution offices, consumer arbitration committees, and official and private entities, persons, institutions or organizations permitted by the provisions of the legislation in order to fulfill legal transactions and obligations; to supervisory and regulatory authorities within the framework of reporting and review requests; to insurance companies, life pension companies and reinsurance companies located in the country or abroad, with your consent, to carry out reinsurance and coinsurance transactions; to authorized agents/brokers for policy issuance, renewal and follow-up of indemnity payment transactions; to actuaries for actuarial evaluation; to specialists to get opinions about your health status; to consultants/experts and institutions providing health research services in order to obtain opinions on the reports at the indemnification stage; to banks/financing companies for the purpose of making insurance premium and indemnity payments; to our shareholders, Kuveyt Türk Katılım Bankası A.Ş. and Albaraka Türk Katılım Bankası A.Ş. and their affiliates in order for them to provide insurance products and services and within the scope of their audit activities; to support service providers in order to fulfill the assistance and consultancy services promised in the policy; to postal and courier companies in order to fulfill contractual obligations, and the suppliers from whom we receive call center, information systems, and archive management systems within the scope of support service regulation; to an independent audit company to audit that the activities are carried out pursuant to the legislation.

## **3) Data Collection Method and Legal Reasons:**

Your personal data are collected by our Company fully or partially as oral or in writing at physical or electronic environment through automated means or by non-automated means which form part of a data filing system directly from you through non-automated means with application and offer forms or from our agents, our business partner brokers, our call center, our digital channels, our internet branches, our mobile applications, our software packages, organizations providing health research services, companies providing assistance services, support service and other service providers, consultants we receive service from, through the platforms we received authority from the state authority (identity/address sharing systems), and where permitted by the applicable legislation, from the Insurance Information and Monitoring Center, Social Security Institution, the Ministry of Health, health institutions and organizations, insurance companies, and other state institutions and organizations, if it is necessary for processing the personal data of the contractual parties, provided that it is directly related to the execution and performance of the contract, and your explicit consent is obtained pursuant to Article 5 of Law; if it is required for our company to fulfill its legal obligations; if data processing is required for acquiring, exercising or protecting a right, and for the legitimate interests of our Company, provided that it does not harm your fundamental rights and freedoms ; and your personal data of special nature are processed only if your explicit consent is obtained pursuant to Article 6 of Law.

Your data are stored in secured environments, and all measures are taken to prevent unauthorized access.

## **4) Your Rights as the Data Subject:**

Your rights pursuant to Article 11, titled “The Rights of Data Subject,” of PPD Law are as follows:

- To learn whether their personal data are processed or not,
- To demand for information as to if their personal data are processed,
- To learn the purpose of their data processing and whether these personal data are used in compliance with the purpose,
- To learn the third parties to whom personal data have been transferred in the country or abroad,
- To request the rectification of the incomplete or inaccurate data, if any,
- To request erasure or destruction of your personal data under the conditions referred to in Article 7,
- To request reporting of the operations made as sub-paragraphs (d) and (e) to third parties to whom personal data have been transferred,
- To object to the occurrence of any result against the person yourself by analyzing the data processed solely through automated systems, and

- To claim compensation for the damage arising from the unlawful processing of your personal data.

You can submit your claims arising from the relevant article in writing to “Saray Mahallesi Dr. Adnan Büyükdeniz Caddesi No: 2 Akkom Ofis Park 3. Blok Kelif Plaza Kat: 2 Ümraniye/İstanbul” pursuant to the Communiqué on the Principles And Procedures for the request to Data Controller (the “Communiqué”) or by sending an e-mail to our registered electronic mail (KEP) address at “[katilimemeklilik@hs03.kep.tr](mailto:katilimemeklilik@hs03.kep.tr)”, or “[info@katilimemeklilik.com.tr](mailto:info@katilimemeklilik.com.tr)” only by using secured electronic signature, mobile signature or utilizing the e-mail address previously informed to our Company by the data subject, or through the data subject claim form on our website at “<https://www.katilimemeklilik.com.tr/bilgilendirme/kisisel-verilerin-korunmasi>.”

Our company will conclude the demands set forth in the request within the shortest time, but in any case, at the latest within thirty days, depending on the nature of the demand. Our company may charge you a fee for your demand pursuant to Article 7 of the Communiqué.

*\* This is an English translation. In case of any difference in meaning between the original Turkish text and the English translation, the Turkish text shall apply.*