# ING

## Ing Bank A.Ş. Privacy Statement Regarding Ethical Reporting

Pursuant to Law No. 6698 on the Protection of Personal Data ("Law"), your personal data will be processed by ING Bank A.Ş. ("Bank") as the data controller within the scope described below.

#### Purposes and Legal Conditions for Processing Personal Data

Your personal data to be collected within the scope of the ethical reporting application will be processed by the Bank by taking the administrative and technical measures within the personal data processing conditions specified in Article 5 of the Law for the purposes described below ("Purposes").

Ethical reporting, non-compliance or non-compliance through the relevant communication channels allocated by the Bank to receive reports of illegality in a completely confidential and reliable manner and to subsequently investigate the report It has been established for communication to the internal units of the Bank. Regarding the communication channel in question, the reporting, and the personal data of the individuals subject to the allegations and third parties involved in the notification case are as follows purposes.

Although the information that may be processed through the ethical reporting channel may vary depending on the incident subject to the report together with; **identity** (name-surname, Turkish ID number, date of birth, etc.) **contact** (telephone number, address, e-mail address, etc.), **compliance**, **financial information**, **customer transaction information** and **transaction security** information such as IP information.

We would like to remind you that in the notifications and applications made to our Bank within the scope of ethical reporting practice, information other than the following and the personal data required for the examination and evaluation of the notification made by you should not be shared.

# Based on the legal condition that data processing is mandatory for the legitimate interests of our Bank, provided that it does not harm the fundamental rights and freedoms of the data subject;

- Implementation and management of ethical reporting in accordance with the Bank's internal policies,
- To ensure that reporting persons can report any non-compliance or legal violations related to the following issues:
  - Undesirable behavior
  - Money laundering or financing of terrorism
  - Financing clients who violate human rights or commit environmental offences
  - Breaches of confidentiality or privacy
  - Fraud
  - Bribery or corruption
  - Accounting, internal accounting controls or auditing matters
  - Market manipulation
  - Insider trading
  - Violation of legislation
- Verification of the legitimacy of the claims received,
- Pursuance and evaluation of reported incidents,
- Preparation of reports on the operation and results of the notification project,
- Investigation of suspected compliance or legal violations,

Ticaret Unvanı: ING Bank A.Ş.; Sicil Numarası; 269682; İşletme Merkezi: İstanbul (Merkez Adresi: Reşitpaşa Mah. Eski Büyükdere Cad. No:8 34467 Sarıyer/İstanbul); İnternet Sitesi: www.ing.com.tr; 0850 222 0 600; MERSİS No: 0876 0042 2430 0365

- To ensure that the obligations imposed by laws, regulations or internal policies of the Bank are properly pursued.
- Execution of internal audit and investigation processes,
- Pursuing ethical principles and conducting disciplinary processes,

# Based on the legal condition that it is mandatory for our Bank to comply with its legal obligations as a data controller and that it is clearly stipulated in the laws;

- In order to ensure that the obligations imposed by laws, regulations or internal policies of the Bank are properly followed.
- In order to comply with legal notification obligations (e.g., notification of a crime or data breach to the competent authorities).

### To whom and for what purpose the processed personal data can be transferred

Your collected personal data may be transferred by the Bank to legally authorized public institutions and legally authorized private persons, our suppliers in accordance with Article 8 of the Law within the framework of the personal data processing conditions and purposes specified in Article 5 of the Law in line with the realization of the Purposes listed above.

#### **Method of Personal Data Collection**

Your personal data is collected electronically through the ethical reporting application for the purposes specified in this Privacy Statement and within the above-mentioned personal data processing conditions specified in Article 5 of the Law.

#### Rights of the Data Subjects Listed in Article 11 of the Law

As a data subject, we inform you that you have the following rights pursuant to Article 11 of the Law:

- To learn about whether your personal data is being processed or not,
- Requesting information if your personal data has been processed,
- To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom your personal data are transferred domestically or abroad,
- To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
- Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of your personal data in the event that the reasons requiring its processing are no longer available, and in case your personal data is incomplete or incorrectly processed, to request notification of the transactions made to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing your processed data exclusively through automated systems,
- To request compensation for damages in case you suffer due to unlawful processing of your personal data.

You can use your applications for your rights listed above by filling out the Ing Bank A.Ş. Application Form, which you can access from the , Site Basvuru Formu 060722 .pdf (ing.com.tr) page or through any of the following channels:

Ticaret Unvanı: ING Bank A.Ş.; Sicil Numarası; 269682; İşletme Merkezi: İstanbul (Merkez Adresi: Reşitpaşa Mah. Eski Büyükdere Cad. No:8 34467 Sarıyer/İstanbul); İnternet Sitesi: www.ing.com.tr; 0850 222 0 600; MERSİS No: 0876 0042 2430 0365

- By verifying your identity and applying in person to Reşitpaşa Mahallesi, Eski Büyükdere Caddesi, No:8, 34467 Maslak-Sarıyer,İstanbul or any of our branches;
- By sending your application via e-mail to ingbank@hs03.kep.tr by using your registered e-mail address;
- By sending an e-mail to verikoruma@ingbank.com.tr with your personal e-mail address which has a secure electronic signature or mobile signature or the e-mail address you used to register to our system;
- By using another method specified in the Communique on the Procedures and Principles of Application to the Data Controller.

Your application will be finalized by us within 30 (thirty) days of receipt. If the transaction requires cost, we will apply the tariff determined by the Personal Data Protection Board. If your application is rejected, the reason for rejection will be justified by us in writing or in electronic format.