



AZİMUT PORTFÖY YÖNETİMİ A.Ş.
INFORMATION NOTICE ON PERSONAL DATA PROCESSING

Pursuant to Article 10 of the Personal Data Protection Law No. 6698 (“KVKK”), published in the Official Gazette No. 29677 on April 7, 2016, which aims to protect fundamental rights and freedoms, particularly the privacy of private life, as well as the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform, published in the Official Gazette No. 30356 on March 10, 2018, this Information Notice has been prepared to inform you about the processing of your personal data. In this regard, **Azimut Portföy Yönetimi A.Ş. (“Azimut Portföy” or the “Company”)**, acting as the data controller, with its registered address at Büyükdere Cad. Kempinski Res. Astoria B Kule N127 K9/29...32, Esentepe, Şişli, Istanbul (MERSIS No: 0396013904700013), aims to inform you regarding the processing of your personal data.

1. PROCESSING OF PERSONAL DATA AND PURPOSES

Your personal data is processed by Azimut Portföy in compliance with the law and the principles of good faith, in an accurate and up-to-date manner, for specific, explicit, and legitimate purposes. The processing is relevant, limited, and proportionate to the intended purposes and retained for the period necessary to fulfill these purposes or as required by law. Personal data may be recorded, stored, updated, transferred to third parties, and processed to the extent permitted by law.

Personal Data Processed by Azimut Portföy;

Personal Data	Purpose of Processing	Legal Basis
Identity Information (Name, surname, Turkish ID number, passport number, place and date of birth, gender, marital status, spouse/child details, nationality) Contact Information: (Address, email, registered email address, mobile phone, landline, fax number etc.)	• Execution of capital market activities and portfolio management as per Capital Markets Law No. 6362 and portfolio management • Fulfillment of contractual obligations • Recording customers' identity, address, and other necessary information to enable customer recognition, identity verification, and confirmation, allowing us to identify the information related to the transactions our customers will conduct • Fulfillment of monitoring, reporting, and information obligations as required by legal authorities, regulatory agencies, industry-specific regulatory bodies, and other authorities. • Compliance with information retention, reporting, and notification obligations requested by public institutions and judicial authorities (such as the Central Registration Agency, Financial Crimes Investigation Board, Turkey Capital Markets Board, Borsa Istanbul, Takasbank, Revenue Administration, Banking Regulation and	The necessity of data processing for the establishment, use, or protection of a right. The necessity of processing personal data belonging to the parties of a contract, provided that it is directly related to the establishment or performance of the contract. The necessity for the data controller to fulfill its legal obligation. Clearly stipulated in the laws.

	Supervision Agency, Custodian Institutions, and other relevant organizations). • Ensuring compliance with the information retention, reporting, notification, tax, and other obligations as stipulated by legal regulations for the organization of records and documents. • Enabling operational processes to be carried out. • Keeping customer information up to date. • Tracking requests and complaints. • Carrying out audit activities. • Responding to requests from authorized institutions and organizations. • Risk management. • Determining commercial and business strategies. • Managing billing processes. • Carrying out advertising, promotion, and marketing activities.	
Financial Information (Credit and risk data, income details, asset information, transaction records, investment details, bank account numbers, IBAN, all financial information relevant to mutual funds subs./redemp.)	• Carrying out capital market activities and portfolio management in accordance with the Capital Markets Law No. 6362 and related legislation. • Fulfillment of contractual obligations. • Executing the transfer of capital market instruments and cash assets. • Monitoring finance and accounting transactions. • Meeting monitoring, reporting, and information obligations as required by legal authorities, regulatory agencies, industry-specific regulatory bodies, and other authorities. • Compliance with information retention, reporting, and notification obligations requested by public institutions and judicial authorities (such as the Central Registration Agency, Financial Crimes Investigation Board, Turkey Capital Markets Board, Borsa Istanbul, Takasbank, Revenue Administration, Banking Regulation and Supervision Agency, Custodian Institutions, and other relevant organizations). • Determining commercial and business strategies. • Managing billing processes.	The necessity of data processing for the establishment, use, or protection of a right. The necessity of processing personal data belonging to the parties of a contract, provided that it is directly related to the establishment or performance of the contract. The necessity for the data controller to fulfill its legal obligation. Clearly stipulated in the laws. The necessity of giving open consent of the relevant person

Commercial Data (Tax certificate, trade registry documents, signature circulars, power of attorney details)	• Conducting capital market activities and portfolio management within the scope of Capital Markets Law No. 6362 and related regulations, • Fulfilling contractual obligations, • Complying with information storage, reporting, and notification obligations requested by public institutions and judicial authorities (such as the Central Registry Agency, Financial Crimes Investigation Board, Turkish Capital Markets Association, Borsa Istanbul, Takasbank, Revenue Administration, Banking Regulation and Supervision Agency, Custodian Institutions, and other relevant institutions and organizations), • Conducting customer identification, identity verification, and confirmation processes, • Fulfilling monitoring, reporting, and notification obligations required by legal authorities, regulatory bodies, industry-specific regulatory organizations, and other authorities, • Carrying out audit activities, • Responding to requests from authorized institutions and organizations, • Managing billing processes.	Processing of data is necessary for the establishment, exercise, or protection of a right. Personal data processing is necessary for the performance of a contract, provided it is directly related to the establishment or execution of the contract and the personal data of the parties to the contract. It is explicitly required by laws. It is necessary for the data controller to fulfill its legal obligations.
Educational, Employment, and Professional Data (Occupation, title, employment details)	• Determination of commercial and business strategies. • Fulfilling the monitoring, reporting, and notification obligations required by legal authorities, regulatory bodies, industry-specific regulatory organizations, and other relevant authorities.	Explicitly prescribed by laws. Necessary for the data controller to fulfill its legal obligations.
Visual and Audio Data (CCTV recordings)	• Carrying out audit activities. • Conducting customer identification, identity verification, and confirmation processes, and being able to ascertain the information of customers involved in transactions. • Fulfilling the monitoring, reporting, and notification obligations required by legal authorities, regulatory bodies, industry-specific regulatory organizations, and other relevant authorities. • Responding to requests from authorized institutions and organizations. • Risk management and security measures.	The processing of your data is necessary for our legitimate interests, provided it does not harm your fundamental rights and freedoms.



	• Evaluating and auditing requests and complaints. • Carrying out internal control and oversight activities.	
Marketing Data (Cookies, survey results, campaign participation details)	• Monitoring and maintaining customer satisfaction. • Offering personalized products and services to customers. • Conducting survey studies. • Carrying out promotional and advertising activities.	The necessity of giving open consent of the relevant person
Legal Process Data (Litigation and enforcement case details, legal correspondence)	• Issuance of invoices. • To exercise our legal rights in the event of a potential legal dispute regarding your purchases/rentals.	Explicitly prescribed by laws. Necessary for the data controller to fulfill its legal obligations.
Other Information Shared with Consent	• In addition to the information requested as part of the services, your personal data shared by you will be processed based on your consent for the purpose of providing the services.	The necessity of giving open consent of the relevant person

2. TRANSFER OF PERSONAL DATA

Your collected personal data may be transferred, in accordance with the Personal Data Protection Law (KVKK) and relevant legislation, and for the purposes outlined in Article 1 of this Privacy Notice, generally with your explicit consent. However, due to our legal obligations, personal data may be shared with courts and other public authorities, but only to the extent required by law. Additionally, to provide the services we have committed to, conduct quality control of the services provided, carry out personalized product and service promotions, perform other marketing activities, and obtain specialized consulting services, personal data may be transferred to third parties with whom we have agreements, within the limits specified by the relevant legislation.

On the other hand, your personal data may be transferred to public and private legal entities (such as the Banking Regulation and Supervision Agency (BDDK), Capital Markets Board (SPK), Central Bank of the Republic of Turkey (TCMB), Financial Crimes Investigation Board (MASAK), Revenue Administration (GİB), Turkish Statistical Institute (SPL), Borsa Istanbul, etc.), as explicitly authorized by law and for the purposes outlined in this Privacy Notice, where permitted by Law No. 6362 on Capital Markets and other applicable regulations.

Recipient	Purpose of Transfer
Legally authorized public institutions and judicial authorities (Borsa Istanbul, MASAK, SPK, TCMB, etc.)	Carrying out audit activities. Fulfilling legal obligations. Preparation of legal reports. Handling complaints, lawsuits/enforcement proceedings, and other legal procedures.



Partners, program partners, intermediary institutions, consultants, lawyers, and financial advisors with whom services are procured or collaborations are made to carry out activities.	Provision of products and services. Conducting company operations. Fulfilling contractual obligations. Fulfilling legal obligations.
Shareholders, and other individuals within the same corporate group as the shareholders	The execution of the provided service (will be transferred in exceptional cases based on explicit consent).
Custodian Inst.	Custody of financial assets, maintaining records. Fulfilling legal obligations.

3. METHODS OF COLLECTING PERSONAL DATA

Your personal data is collected through various channels, including:

- Website interactions
- Contracts and application forms
- Electronic communication (emails, phone calls, mobile applications, digital platforms)
- Face-to-face interactions with company representatives

The data is processed in compliance with Articles 5, 6, and 8 of KVKK based on legal grounds, including explicit consent, contractual necessity, and legal obligations.

4. HOW TO EXERCISE YOUR RIGHTS

Under Article 11 of KVKK, you have the right to:

- Request information about whether your personal data is processed
- Learn the purpose of data processing and whether it is used accordingly
- Request the correction of inaccurate data
- Request the deletion or anonymization of your personal data
- Object to automated data processing decisions

To exercise your rights, you can submit your requests via:

- Registered mail to Esentepe Mah. Büyükdere Cad. No:127 Kempinski Residences Astoria B Tower, Floor 9, Şişli, İstanbul
- Notary public communication
- Email to [azimutportfoy@hs01.kep.tr] using your registered electronic signature or previously recorded email address.

Investor/Customer

Date :

Full Name/Company Name:

Signature: