

PRIVACY NOTICE ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

This Privacy Notice has been prepared by MARMARA CAPITAL PORTFÖY YÖNETİMİ A.Ş. (Marmara Capital) for the purpose of fulfilling its obligation to inform, under Article 10 of the Personal Data Protection Law No. 6698 ("KVKK") concerning the processing of the personal data of our customers, prospective customers, and the representatives and employees of the persons/institutions from whom we receive support services.

1-Identity of the Data Controller

Marmara Capital Portföy Yönetimi A.Ş.

MERSIS No: 0612067617100018

Address: Baltalimanı Mahallesi, Baltalimanı Hisar Street No:14/3 Sarıyer – İstanbul

Phone: +90 212 346 10 36

E-mail: info@marmaracapital.com.tr

Registered Electronic Mail (KEP): marmaracapital@hs01.kep.tr

2-PERSONAL DATA PROCESSED, PURPOSES OF PROCESSING AND LEGAL BASIS

Within the scope of your relationship with Marmara Capital, the following personal data are processed:

Identity Information: Full name, mother's and father's names, nationality, place of birth, date of birth, driving licence information, marital status, passport number, Turkish Republic identity number and tax identification number.

Contact Information: Home and business addresses, e-mail address and mobile telephone number.

Professional Experience Information: Occupation, transcript and diploma.

Customer Transaction Information: Customer complaints, requests and expressions of thanks, telephone records, invoice information, transaction information and request information.

Marketing Information: Information concerning the frequency and volume of past transactions and information concerning products.

Financial Information: Bank account number, debt and credit information, asset information, financial performance information and balance-sheet information.

Legal Transaction Information: Information contained in correspondence with judicial authorities and information contained in legal case files.

Demographic Information: Education level, income level and similar profile information.

Visual and Audio Records: Voice recordings.

Marmara Capital hereby informs you that any and all information relating to you that has been or will be obtained by Marmara Capital, or that you have shared or will share with Marmara Capital ("Personal Data"), will be processed by Marmara Capital within the framework described below and in the manner prescribed under the aforementioned Law, and that any operation performed on your information, including its collection, recording, storage, retention, alteration, disclosure, transfer or making available by automated or non-automated means, constitutes the "processing of personal data." Your Personal Data collected through these methods may also be processed and transferred for the purposes specified below, within the scope of the personal data processing conditions and purposes set out in Articles 5 and 6 of Law No. 6698.

Purpose of Processing:

The purposes of processing Personal Data may include using such Personal Data in connection with all products and services to be provided to you under the Capital Markets Law, the Law on the Prevention of Laundering Proceeds of Crime and the relevant legislation; recording identity, address, tax identification number and other relevant information for the purpose of identifying the owner and addressee of every transaction and operation to be carried out; preparing the information and documents that will constitute the basis of transactions and operations to be carried out in paper or electronic form; complying with the information-retention, reporting and notification obligations prescribed by all competent judicial and administrative authorities under the relevant legislation; providing other products and services offered by and requested from Marmara Capital; and performing the agreement entered into between you and Marmara Capital.

Legal Basis for Processing and Transfer:

The primary basis for the processing of Personal Data is your explicit consent. However, where any of the following conditions applies, your Personal Data may be processed without obtaining your consent:

- a) processing is expressly provided for by law;
- b) processing is necessary, provided that it is directly related to the establishment or performance of a contract;
- c) processing is necessary for (Marmara Capital) to fulfill its legal obligations;
- d) your Personal Data have been made public by you through their disclosure to the public and to Marmara Capital;
- e) processing is necessary for the establishment, exercise or protection of a right;
- f) processing is necessary for legitimate interests of (Marmara Capital), provided that such processing does not violate your fundamental rights or freedoms; or
- g) processing is necessary for the protection of the life or physical integrity of a person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or for the protection of the life or physical integrity of another person.

Special Categories of Personal Data:

Personal data relating to a person's race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other beliefs, appearance and clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, constitute special categories of personal data.

The processing of special categories of personal data without the explicit consent of the data subject is prohibited. Among these special categories of personal data, personal data other than those relating to health and sexual life may be processed without the explicit consent of the data subject in cases expressly provided for by law, including on the legal grounds set out above.

Personal data relating to health and sexual life may be processed without the explicit consent of the data subject only by persons subject to a confidentiality obligation or by authorised institutions and organisations, and solely for the purposes of protecting public health, preventive medicine, medical diagnosis, the provision of treatment and care services, and the planning and management of healthcare services and their financing.

3-PURPOSE OF TRANSFER AND RECIPIENT GROUPS

Your Personal Data held by Marmara Capital may be transferred to the persons, institutions and/or organisations to which the transfer of such data is required or permitted under the Capital Markets Law No. 6362, the Law No. 5549 on the Prevention of Laundering Proceeds of Crime, and other laws and applicable legislation, including, without limitation, investment firms specified under Law No. 6362 and other third parties; the Capital Markets Board of Türkiye (SPK); the Banking Regulation and Supervision Agency (BDDK); the Central Bank of the Republic of Türkiye (TCMB); Borsa İstanbul A.Ş. (BIST); Merkezi Kayıt Kuruluşu A.Ş. (MKK); İstanbul Takas ve Saklama Bankası A.Ş. (Takasbank); the Turkish Capital Markets Association (TSPB); the Turkish Employment Agency (İŞKUR); the Capital Markets Licensing Registry and Training Agency (SPL); the Ministry of Treasury and Finance; the Revenue Administration (GIB); judicial authorities; the Social Security Institution (SGK); external service providers; the Custodian Institution; contracted banks; public legal entities authorised to obtain Personal Data; our principal shareholder; organisations from which we receive services and with which we cooperate in order to carry out our capital-markets activities; domestic investment firms; and other third parties.

Personal Data recorded by Marmara Capital are protected. Marmara Capital, as the Data Controller, and its employees may not disclose Personal Data they obtain in violation of the provisions of the Law or use such Personal Data for purposes other than those for which they are processed.

4-METHOD OF COLLECTING PERSONAL DATA

Your Personal Data may be collected through the Head Office; digital applications submitted through websites; e-mail, written or digital applications submitted to direct sales teams; telephone communications; external service providers; and other similar channels, by automated or non-automated means and in written, oral or electronic form.

5-YOUR RIGHTS UNDER THE KVKK

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

- a) learn whether your Personal Data are being processed;
- b) request information if your Personal Data have been processed;
- c) learn the purpose for which your Personal Data are processed and whether they are used in accordance with that purpose;
- d) know the third parties in Türkiye or abroad to whom your Personal Data have been transferred;
- e) request the rectification of your Personal Data if they have been processed incompletely or inaccurately;
- f) request the erasure or destruction of your Personal Data within the framework of the conditions set out in Article 7 of the Law;
- g) request that the operations carried out pursuant to paragraphs (e) and (f) above be notified to the third parties to whom your Personal Data have been transferred;
- h) object to the occurrence of a result against you as a consequence of the analysis of your Personal Data exclusively through automated systems; and
- i) claim compensation for any damage you suffer as a result of the unlawful processing of your Personal Data.

You may submit your requests under Article 11 of the KVKK concerning your Personal Data processed by us at any time, in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller, in writing or by using a registered electronic mail address (KEP), a secure electronic signature, a mobile signature, or an e-mail address that you have previously notified to us and that is registered in our systems, to the addresses below.

Address: Baltalimanı Mahallesi, Baltalimanı Hisar Caddesi No: 14, İç Kapı No: 3, Sarıyer, İstanbul

E-mail: info@marmaracapital.com.tr

Registered Electronic Mail Address (KEP): marmaracapital@hs01.kep.tr

Update Date: 24.03.2026

I have read and understood the Privacy Notice on the processing of my Personal Data.

Investor's Full Name or Trade Name:

Investor's Signature: