# PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA MAPFRE GO

#### A. Who is the Data Controller?

As MAPFRE Sigorta A.Ş. ("MAPFRE" or "Company"), we attach great importance to the protection of your personal data. As MAPFRE, we act as a data controller when processing your personal data. This clarification text has been prepared to inform you about how your personal data is processed due to your use of the MAPFRE GO application ("MAPFRE GO").

#### B. Your Processed Personal Data, Purposes and Legal Reasons for Processing Your Personal Data?

Articles 5 and 6 of the <u>Law No. 6698 on the Protection of Personal Data</u> ("**Law**") regulate the legal grounds for personal data processing. In the absence of any of the exceptions specified in the Law for the processing of personal data, your explicit consent is requested for the processing of your personal data.

**Creating Membership to MAPFRE GO Application and Using the Application:** MAPFRE GO is an application offered by MAPFRE for easy handling of insurance transactions. This application can be accessed via the website <a href="https://go.mapfre.com.tr/giris-yap">https://go.mapfre.com.tr/giris-yap</a> and it is also possible to use the application on mobile.

Application users can use the application by creating a membership from the "Become a Member" screen if they want to use MAPFRE GO. Within the framework of the creation of membership to the application and the use of the application within the scope of membership, the purposes of processing your personal data and the legal reasons we rely on them are as follows:

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Objectives	Legal Reason	Personal Data Processed
Verification of identity and contact information within the scope of creating MAPFRE GO membership  Monitoring and tracking the issued policies and additional documents (special conditions, endorsements, etc.) attached to the policy  Ability to perform invoice upload operations  Viewing and tracking collateral, limit information and exemption information  Creation of collateral requests  Reporting damage and conducting the damage assessment process  Execution of policy renewal and update processes  Ability to track premium payment transactions  Execution of policy cancellation and premium refund transactions  Fulfillment of the obligations assumed under the insurance contract  Fulfillment of the obligations  undertaken under the insurance contract and provision of insurance services  Obtaining information about contracted pharmacies, health institutions and authorized auto services	Art. 5/2 (c) of the Law  Provided that it is directly related to the conclusion or performance of a contract, it is necessary to process personal data of the parties to the contract.	<ul> <li>Identification (namesurname, Turkish ID Number, date of birth ),</li> <li>Contact (cell phone number, email address),</li> <li>Visual and audio recordings (your MAPFRE GO membership profile picture if you have uploaded it),</li> <li>Insured Transaction (financial, health, claims process information, subrogation data, bank information you have provided for claim payments and policy information),</li> <li>Information on transaction security (IP address, login and log logs),</li> <li>Risk Management (information on risk, fraud information)</li> <li>Other (Information about your vehicle such as Vehicle License Plate, Vehicle Registration License)</li> </ul>

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Providing you with information regarding		
the evaluations made within the scope of		
insurance coverage		
Within the scope of the Insurance Law No.		Identification (name-
5684 and the Regulation on Information in		surname, Turkish ID
Insurance Contracts issued based on this		number, date of birth),
law, contacting you about the conditions		<ul> <li>Contact (cell phone</li> </ul>
and current status of your insurance		number, email address),
contract during the establishment and		<ul> <li>Visual and audio recordings</li> </ul>
continuation of the contract and informing	Art. 5/2 (ç) of the Law	(your MAPFRE GO
you about the changes in your insurance		membership profile picture
contract	Data processing is	if you have uploaded it),
Pursuant to Law No. 5549 on the	mandatory for the data	<ul> <li>Insured Transaction</li> </ul>
Prevention of Laundering Proceeds of	controller to fulfill its	(financial, health, claims
Crime and the relevant legislation issued	legal obligation.	process information,
based on this law, the fulfillment of our		subrogation data, bank
obligations regarding the identification of		information you have
the identity information of our real person		provided for claim
customers and the notification of		payments and policy
suspicious transactions, the prevention		information),
and detection of fraud and money		<ul> <li>Information on transaction</li> </ul>
laundering within the scope of crime		security (IP address, login
prevention		and log logs),
		<ul><li>Risk Management</li></ul>
	Art. 5/2 (e) of the Law	(information on risk, fraud
		information)
	Data processing is	<ul><li>Legal Action</li></ul>
Protecting and exercising our rights in the	mandatory for the	(correspondence with
event of a possible dispute and	establishment, exercise	judicial authorities,
conducting legal proceedings	or protection of a right.	information on
		litigation/execution files in
		case of dispute)
		<ul><li>Other (Information about</li></ul>
		your vehicle such as Vehicle
		License Plate, Vehicle
		Registration License)
Directing the insured to the most suitable		Identification (name-
agencies for their needs (e.g. identifying		surname, Turkish ID
the agency closest to the individual)		number, date of birth),
		Contact (cell phone
Planning the activities subject to your		number, email address),
ongoing relationship with our Company		<ul><li>Visual and audio recordings</li></ul>
and planning the business activities		(your MAPFRE GO
necessary to facilitate the provision of	Art. 5/2 (f) of the Law	membership profile picture
products/services		if you have uploaded it),
Contacting you regarding your policy and	Data processing is	- Insured Transaction
other products or services you have	mandatory for the	(financial, health, claims
received from our Company	legitimate interests of	process information,
Carrying out reporting, auditing, analysis	the data controller,	subrogation data, bank
and statistical studies within our	provided that it does	information you have
Company	not harm the	provided for claim
Execution of information security	fundamental rights and	payments and policy
processes	freedoms of the data	information),
Conducting finance and accounting affairs	subject.	
considering marioe and accounting arrains	<u> </u>	1

Evaluating your complaints, requests and Information on transaction suggestions and taking actions regarding security (IP address, login them, improving processes, and carrying and log logs), out activities for customer satisfaction Risk Management (information on risk, fraud information) **Legal Action** (correspondence with judicial authorities, information on litigation/execution files in case of dispute) Other (Information about your vehicle such as Vehicle License Plate, Vehicle Registration License)

## C. With Whom Do We Share Your Personal Data?

Your personal data are shared within the scope of the purposes and legal reasons specified under the heading "B. Your Personal Data Processed, What are the Purposes and Legal Reasons for Processing Your Personal Data?" of this privacy notice.

When some institutions and organizations request information and documents from our Company or in order to carry out our operational processes regarding the activities of our Company, we share your personal data with these authorized institutions and organizations and relevant third parties in accordance with the rules in the Law and relevant legislation. In this context, the parties we share and the purposes of sharing are as follows:

- Authorized Institutions and Organizations (such as the Financial Crimes Investigation Board (MASAK), the Natural Disaster Insurance Institution, and the Undersecretariat of Treasury, which are authorized to request information and documents from our Company): These institutions may request information and documents from our Company as part of reporting, inspection, audit, supervision, and legal proceedings. In accordance with legislation regarding the prevention of proceeds of crime, this includes the identification of personal information of our individual customers (policyholder, insured, or beneficiary) and fulfilling our obligation to report suspicious transactions.
- Insurance Information and Supervision Center: To collect information essential for risk assessment, including incorrect insurance practices, and to ensure that this information is shared with insurance, reinsurance, and pension companies involved in insurance activities, as well as with individuals designated by the Turkish Insurance and Private Pension Regulation and Supervision Agency (SEDDK) The purpose is to more effectively fulfill public oversight, provide reliable statistics related to insurance, ensure uniform application, prevent insurance fraud, increase trust in the insurance system, provide secure insurance payment services, manage insured information processes and notifications, ensure the proper and accurate execution of compensation payments, identify those without mandatory insurance, and increase insurance coverage rates. It also ensures the accuracy and currency of data, compliance with legislative requirements, or the execution of SBM's workflows, activities, projects, and tasks requested by SEDDK. Additionally, through the Insurance Fraud Information Sharing System, it aims to prevent fraud, reduce additional costs, determine whether risks are covered by insurance, and appropriately price risks.
- Audit and Supervision Authorized Institutions and Independent Audit and Tax Companies:
   Fulfillment of our Company's audit obligations,
- Parties from whom we receive support and services: Provision of technical examination and control services, execution of service procurement processes, provision of repair, maintenance, storage and archive services, provision of assistance services, if you have given permission for sending commercial electronic messages, obtaining services within the scope of sending commercial electronic messages and sending such messages, execution of finance

- and accounting processes, execution of information security processes, consulting physician opinion for collateral evaluations, determination of insurance risks,
- Judicial and Administrative Authorities: Fulfillment of judicial and administrative proceedings and dispute resolutions, protection of our Company's legal rights,
- Insurance and Reinsurance Companies: Carrying out insurance transition, reinsurance and coinsurance transactions, assisting in the resolution of any insurance claim, performing risk assessment, verifying the accuracy of the information you provide to our Company,
- Contracted Agents and Brokers: Receiving applications for the insurance product and conducting
  the offer process, establishing the insurance contract, issuing and renewing the policy and
  following up the indemnity payment transactions, sending commercial electronic messages if you
  have given permission to send commercial electronic messages and sending such messages,
  conducting financial and accounting affairs,
- Our Contracted Healthcare Organizations and Business Partners: Completion of your indemnification and provisioning procedures and collateral evaluation, sharing information within the scope of offering the relevant product or service with the persons with whom we offer products or services and with whom we are business partners.

In the transfer of your personal data to third parties, compliance with the rules specified in the articles on the transfer of personal data in the Law is ensured.

## D. By Which Methods and Based on Legal Grounds Do We Collect Your Personal Data?

Your personal data is obtained through the MAPFRE GO application and through your insurance policies already created and registered in the system. We collect your personal data through MAPFRE GO partially by automated methods. Your personal data are processed based on the legal grounds that the processing of personal data is necessary for the establishment or performance of a contract, the fulfillment of our legal obligations, the establishment, exercise or protection of a right, the processing of data is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject, and the explicit consent of the data subject.

## E. What are Your Rights Regarding Your Personal Data?

Article 11 of the Law on the Protection of Personal Data regulates "data subject rights". In order to use your personal data within the scope of this article, you can use **your e-mail address registered in our systems** and send it to the e-mail address <a href="mailto:kvkk@mapfre.com.tr">kvkk@mapfre.com.tr</a> or **send it by mail** to Torun Center, Fulya Mahallesi, Büyükdere Cad. No: 74/D Şişli/İstanbul.

You may also choose the methods specified in the <u>Communiqué on the Procedures and Principles of Application to the Data Controller</u> to exercise your rights.

You can access our policy on the processing of your personal data on our website (https://www.mapfre.com.tr/sigorta-tr/bireysel/).