

# GS Markets

## Privacy policy

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## 1. Introduction

Your privacy is important to us.

The purpose of this privacy policy is to explain how we collect, use or otherwise process your personal data when you use our website (available under [www.goldmansachs.com.tr](http://www.goldmansachs.com.tr)) ('Website') so that you understand what we do with your personal data, why we use it and the options available to you. This privacy policy also sets out the types of cookies and tracking technologies we use on our Website, for what purposes we use them and the choices you can make.

### Which entity is responsible for the processing of your personal data?

The Website is operated by Goldman Sachs, which is responsible for the processing of your personal data as controller. When we use 'we', 'us' or 'Goldman Sachs' in this document, we are referring to:

Goldman Sachs International  
Plumtree Court, 25 Shoe Lane,  
EC4A 4AU, London,  
United Kingdom

### What do we mean by personal data?

Any information that is about you or that can be used to identify you is personal data. This includes, for instance, your name, address, email address, and online or device information like IP addresses.

A list of the personal data that we collect, use and manage is set out in section 4 below.

## 2. Who this privacy policy applies to

This privacy policy applies to the people listed below. We collect personal data about all of them:

- Visitors to our Website or related social media pages
- Anyone who corresponds directly with us by post, email, social media or any other method in connection with the use of our Website and related services.

Communications conducted through the Website hotline and through the contact e-mail provided on the Website will be received by the market maker Unlu Menkul Degerler A.S. and the personal data provided in these communications will not be processed by Goldman Sachs.

### What if you're not covered by this privacy policy?

If you have a different relationship with Goldman Sachs that isn't listed above, then please visit [www.goldmansachs.com/privacy-and-cookies](http://www.goldmansachs.com/privacy-and-cookies) to find out more about how your personal data is processed.

For Unlu Menkul Degerler A.S.' statement regarding the processing and protection of personal data, please kindly refer to <https://www.unlumenkul.com/kisisel-verilerin-korunmasi-ve-islenmesi/>.

### 3. How we collect your personal data

#### We collect personal data about you when:

You communicate directly with us by email, by post or related social media platforms or using any other method. We may also collect information when you open or click on links in our direct email communications.

You visit our Website, e.g. click on links or download content, or use our products or services.

You make a complaint or give feedback directly to us. This includes any data you share with us or that we receive as part of our investigation into your feedback or complaint.

### 4. What personal data we collect and use

You are free to visit our Website without actively providing any of your personal data. In this case, we will only receive certain information that is collected automatically when you connect to our site (such as your IP address and other related data). We use such data to provide you with our Website and services. We also use cookies and other tracking technologies to analyse usage of our Website and to improve our products and services (see section 9). To ensure our Website reflects applicable local regulatory requirements, we may need to track your IP address before you can visit our Website to understand from which geographical region you are accessing our Website.

As noted in section 2, communications conducted through the Website hotline and through the contact e-mail provided on the Website will be received by the market maker Unlu Menkul Degerler A.S. and the personal data provided in these communications will not be collected or used by Goldman Sachs.

Below we set out what data we collect and use and when we collect it. Please note that some data elements appear in more than one category of collection.

Data we collect and use	When we collect it
<b>Contact information</b> This includes your name, address and email address.	Automatically when you communicate with us directly by email or related social media pages.  Manually when you write to us by post.
<b>Correspondence</b> This can include your email address, your correspondence, and social media contact details.	Automatically when you write to us directly by email or related social media pages or any other method, or when you open or click on links in our email communications.  Manually when you write to us by post.

<b>Complaints information</b>  This includes details about your complaint, and the progress and outcome of your complaint.	Automatically whenever you make a complaint directly with us by email or related social media pages.  Manually whenever you make a complaint by post.
<b>IP address, cookie identifiers, device and location</b>  This includes your IP address and approximate location, user cookie identifiers, information about the device you use to access our services, and about your browser.	Automatically when you visit our Website.  For details please see section 9 below on cookies and tracking technologies.
<b>Social media</b>  This includes any information you post or publish on our social media pages in connection with the use of our Website and related services, like Twitter or Facebook. We'll also collect information when you communicate with us using these social media platforms in connection with the use of our Website and related services.	Automatically when you visit our Website or related social media pages, and when you contact us in connection with the use of our Website and related services.

## 5. Why we use your personal data

In this section we explain to you for which purposes we use your personal data and on what legal basis.

### To meet our legal obligations

We use your personal data to help us comply with the relevant laws and regulations that apply to us and our services. We also collect and use your personal data to meet our regulatory requirements by keeping records of correspondences and our business activities.

### When using your data is within our legitimate interests

This means that we use or otherwise process your personal data where it is within our legitimate interests to do so. For example, it is in our legitimate interests to monitor website visitor IP addresses to maintain the security of our website.

We won't process your personal data where your own interests, fundamental rights or freedoms override our interests to use it. The table below includes details of our legitimate interests to use your personal data.

### We specifically use your personal data to do the following:

Communicate with you, such as to respond to any correspondence and to contact you when we need to provide you with information about our services.

Maintain the security of our services.

Protect you and us against misuse of our Website and related services, and against other illegal behaviour, including fraud or other crime, and to investigate circumstances of such inappropriate behaviour.

Maintain the quality of our services.

Understand the performance of our business.

Provide you with a better user experience by customising and personalising content of our Website and related communications to you based on your Website behaviour and interactions and the personal details you provide to us.

Help train our staff so that we can maintain the quality of our products and services.

Produce management information and reports to help us identify potential issues, and to ensure we are managing our risk appropriately.

Establish, exercise or defend our legal claims.

## When you have provided your consent

We further process your personal data where you have given your consent.

## 6. Who we share your personal data with and why

We share your personal data with other members of the Goldman Sachs group and with third party service providers, who act on our behalf to help provide you with our services. Your personal data will only be used for the purposes listed in section 5 above and as described below.

We'll also share your personal data with other types of third parties in the following circumstances:

Why we share your data	Who we share it with
To help detect, investigate and prevent illegal behaviour, including fraud or other crime.	Law enforcement agencies and third party service providers who may share it with others for the same reason.
When we're required to do so by law, or when we're asked to respond to requests from law enforcement agencies or regulators.	Law enforcement agencies, regulators, courts and tribunals, and parties involved in litigation or tribunal proceedings.
To maintain the security of our Website, and to help detect, investigate and prevent malicious attacks.	Third-party content delivery and security vendors
If our business, or part of it, is sold or reorganised.	Prospective purchasers and assignees.
Other extenuating circumstances, such as if we need to get legal advice.	Any other person or company we reasonably think we need to. For example, with our legal advisors.
Other reasons that we'll explain at the appropriate time and always with your consent.	The third parties who ask for your data, who we'll tell you about when we ask for your consent.

## 7. How long we keep your personal data

As a rule, we only keep your data for as long as necessary for the purposes for which your data is collected and processed. For instance, when you visit our website, your IP address is stored for no more than 30 days.

However, we may need to retain some of your data to comply with our legal and regulatory obligations and to meet any requests made by regulators or other relevant authorities and agencies.

We may further keep some of your data to establish, exercise and defend our legal rights and claims or for other legitimate business reasons.

We may also keep your data for other purposes for which we'll ask your permission at the time. Sometimes we will need to keep it to comply with legal or regulatory obligations or Goldman Sachs' policy requirements.

## 8. International transfers

As a member of the Goldman Sachs group, we may rely on services provided to us by our group companies in the United Kingdom, United States and elsewhere. Some of our service providers may also process personal data in countries outside of Turkey.

If we do transfer your data out of Turkey, we will comply with applicable data protection laws including obtaining your explicit consent or receiving the permission of the Turkish data protection authority (Kisisel Verileri Koruma Kurumu / KVKK) when applicable. If the recipients of your personal data are not located in countries considered adequate by the KVKK, we take appropriate measures to ensure that your personal data will be adequately protected by these recipients with a level of protection comparable to the protection in Turkey.

To find out more about our international data transfers and the measures taken by us to protect your personal data, including how to obtain a copy of them, please contact us at the contact details set out at the bottom of this policy.

## 9. Cookies and Website tracking technologies

Our Website uses cookies for performance and analytics purposes. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We may also use web storage and further tracking technologies, such as web beacons, pixel tags and fingerprinting. For the purposes of this section, the term 'cookies' includes all related technologies that work in a similar way.

Below we further explain what types of cookies we use on our Website, for what purposes we use them and the options available to you.

### Essential cookies

These cookies are essential for the correct functioning of our Website, and as such are strictly necessary. They enable basic Website features, like providing secure login, remembering your session and language preference and protecting the Website from attempted fraud or misuse.

### Analytical Cookies

Analytical cookies allow us to analyse your use of our Website (such as your behaviour and interactions, including page views, searches, download of content, click on links, number of visits, etc.) so we can improve its functionality and provide you with the best possible user experience. These cookies further help us to display content tailored according to your interests and preferences.

Our analytical cookies will expire after one year. You can use our [cookie preferences tool](#) to disable these cookies at any time.

## Our cookie preferences tool

To find out more about how we use each of these types of cookies, and to store or change your settings, please [click here](#) or on the cookie preferences link at the bottom of our Website.

## 10. Your rights

We've set out your rights about your personal data below. If you have any questions about your rights or you wish to exercise any of your rights, please contact us using the contact details set out at the bottom of this policy. You should understand that these rights do not apply in all circumstances and are subject to exceptions.

You have the right to:

- a) find out if we are processing your personal data
- b) request relevant information if your personal data has been processed
- c) find out why we are process your personal data and whether your personal data is being processed in accordance with the processing purposes, if relevant
- ç) know the third party recipients of your personal data in Turkey and abroad
- d) request the rectification of incomplete or inaccurate personal data
- e) request the erasure or destruction of your personal data
- f) request that we notify third parties of personal data rectification, erasure or destruction requests
- g) object to a detrimental outcome from personal data processed by exclusively automated means
- ğ) request compensation for damages arising from the unlawful processing of your personal data

## 11. Updates to this policy

The information in this privacy policy may change from time to time. For example, the categories of personal data that we collect, the purposes for which it's processed and the ways in which it's shared may change.

We will update this privacy policy to reflect these changes wherever necessary and we'll give you notice of any significant changes.

## 12. Contact us

If you have any questions or concerns about how we use your data, please get in touch with our data controller representative in Turkey:

Murat Eryürekli

0 212 365 9600

[verbis-goldmansachs@eryurekli.com](mailto:verbis-goldmansachs@eryurekli.com)

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