

PARAM

CLARIFICATION TEXT ON PERSONAL DATA PROCESSING

This clarification text is provided by TURK Elektronik Para A.Ş. ("Company"), as data controller, and TURK Financial Technology A.Ş., as a data processor, within the scope of the Communiqué on the Principles and Procedures to be Followed in Fulfilling Of The Obligation of Inform and Article 10 of Law on the Protection of Personal Data ("LLPD") numbered 6698 in order to inform you.

Processed Personal Data

We process identity data, communication data, financial information data, request/complaint management data, data obtained from other people, and cookie data.

Purposes and Legal Reasons of Processing Personal Data

Personal data shall be processed in accordance with Article 5 of the LLPD as set forth below:

- Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.
- It is necessary for compliance with a legal obligation to which the data controller is subject.
- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Personal data shall be processed for the following purposes by TURK Elektronik Para A.Ş. as data controller:

- providing services as an electronic money institution,
- verifying your identity,
- for the execution of business processes and contract processes,
- reporting and informing the public institutions such as the Banking Regulation and Supervision Agency, The Central Bank of the Republic of Turkey and The Financial Crimes Investigation Board,
- keeping information and documents for ten years due to our legal liability,
- planning and execution of the activities necessary for recommending and promoting the products and services offered by the Company to the relevant persons by customizing them according to the usage habits and needs of the persons concerned,
- measuring customer satisfaction,
- planning and/or execution of audit activities
- Follow-up of legal processes and fulfillment of legal obligations,
- To follow the processes related to finance, accounting and/or invoicing

Collection Method of Personal Data

Personal data shall be processed automatically or by means of telephone recording, /campaign form/application form or the call center of the Company in accordance with principles stated in Article 4 of the LLPD as set forth below:

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- a) Lawfulness and fairness
- b) Being accurate and kept up to date where necessary.
- c) Being processed for specified, explicit and legitimate purposes.
- ç) Being relevant, limited and proportionate to the purposes for which they are processed.
- d) Being stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed.

Transfer of Personal Data

Personal data, shall be transferred in accordance with Article 5 of the LLPD as set forth below:

- Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.
- It is necessary for compliance with a legal obligation to which the data controller is subject.
- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Personal data shall be transferred to the following persons within the following purposes by TURK Elektronik Para A.Ş. as data controller:

- Persons or organizations permitted by LLPD and other legislation;
- Related public legal entities including but not limited to Banking Regulation and Supervision Agency, The Central Bank of the Republic of Turkey and The Financial Crimes Investigation Board,
- Our main shareholder,
- Our direct/indirect domestic affiliates,
- To the program partner institutions that we receive services and cooperate with to carry out our electronic money issuance activities,
- Upon request, to judicial authorities or relevant law enforcement officers,
- Since servers used in the technical infrastructure of the Company for e-mail services are in abroad, data shall be transferred to abroad,
- To third parties who provide services for this work by the Company, within the scope of research conducted before and after the advertisement, the launch, if explicit consent of the data subject is available,
- To the Message Management System, which is a subsidiary of the Union of Chambers and Commodity Exchanges of Turkey, in order to store the permissions required to be obtained within the scope of commercial electronic messages sent/to be sent by the Company for the purpose of marketing goods and services; in a secure environment, to make notifications of approval and rejection by the buyers, and to exercise the right of complaint.

Rights of Data Owner

Personal data owners have the following rights under LPPD:

- to learn whether his/her personal data are processed or not,
- to request information if his/her personal data are processed,
- to learn the purpose of his/her personal data processing and whether this personal data is used for intended purposes,

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- to know the third parties to whom his/her personal data is transferred at home or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of his/her personal data under the conditions laid down in Article 7 of LPPD and in this context, to request notification to third parties to whom his/her personal data has been transferred,
- to object to the processing, exclusively by automatic means, of his/her personal data, which leads to an unfavourable consequence for the personal data subject,
- to request compensation for the damage arising from the unlawful processing of his/her personal data.

You can submit your request to claim any of the above mentioned rights to the following address: "Prof. Dr. Ahmet Taner Kışlalı Mahallesi 2405 Sokak No: 5 ÇANKAYA/ANKARA " with a written explanation containing details on your request along with the related information (Name, surname, Turkish Republic ID number/passport information, residential information, contact information) for your identification, or send it with secure e-signature through the following e-mail: turk.para@hs03.kep.tr