

## CLARIFICATION TEXT ON THE PROCESSING OF PERSONAL DATA

*This clarification text is drafted by **PAYPOLE ÖDEME HİZMETLERİ VE ELEKTRONİK PARA A.Ş.** (PAYPOLE) in its capacity as a data controller within the scope of Article 10 of the Personal Data Protection Law No. 6698 and the Communiqué on Principles and Procedures to be Followed in Fulfillment of the Obligation To Inform.*

Dear our esteemed clients/potential clients: personal data is defined as any information relating to an identified or identifiable natural person within the scope of the Personal Data Protection Law No. 6698 entered into force on 7 of April 2016 (“Law”), and the protection of your personal data and to be informed about your personal data is your fundamental rights as per the Constitution of the Republic of Turkey (“Constitution”). In this regard, since ensuring the safety and processing of your personal data requires great importance and diligence of PAYPOLE and also constitutes an obligation, your data is processed and protected by PAYPOLE within the scope of the Constitution.

“Data Controller” is obliged to inform the related persons at the time of collection of personal data, under the Article 10 of the Law, about the identity of the data controller and of its representative, if any, the purpose of processing of personal data, to whom and for which purposes the processed personal data can be transferred, the method and legal basis of collection of personal data and other rights referred to in Article 11 of the Law, and it is aimed to inform you by making statements about personal data processing operation carried out by PAYPOLE holding the title of data controller within the scope of the “Law” though this clarification text.

### 1. PAYPOLE as Data Controller

Data Controller is defined as, under Article 3-ı of the Law, the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system, and PAYPOLE is a data controller in terms of data of our esteemed clients/potential clients.

### 2. Your Personal Data Processed by PAYPOLE and Collection Methods

No	Category of Data	Data	Collection Method
1	Identity Data	Name-surname, date of birth, place of birth, identification number(s), gender information and other information on identity documents, identity verification date, identity verification status, identity type, nationality, customer number, passport number, signature sample, job and professional knowledge.	With all contracts/information forms and other

2	<b>Communication Data</b>	Mobile phone number, e-mail address, residence address, residence permit.	documents, notifications you will make to PAYPOLE, through written and digital applications, our website, mobile applications, other online applications and products, meetings with our call center or call center from which we receive service, through third party service providers, It is collected by fully or partially automatic methods, provided that it is verbal, written or electronic media through channels such as KPS, SMS, e-mail.
3	<b>Finance Data</b>	Bank account information account number, IBAN number, balance information.	
4	<b>Legal Transaction Data</b>	Information in correspondence with judicial authorities, information in the case file.	
5	<b>Customer Transaction Data</b>	Transaction date, transaction type, transaction amount, place of transaction, method of transaction, transaction type.	
6	<b>Transaction Security Data</b>	User name and password, Device type and ID, usage tracking information, IP address.	
7	<b>Visual and Audio Data</b>	Voice recordings of calls with the Call Center, Photograph, identity card.	
8	<b>Marketing Data</b>	Shopping history, survey, information obtained through campaign work, Marketing information.	

### 3. The Purpose of Processing Your Personal Data and Legal Reason

Legal Reason	Personal Data Category	The Purpose of Processing
	<b>Identity Data</b>	<ul style="list-style-type: none"> <li>○ Verification of client identity.</li> <li>○ Planning and executing the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ In order to comply with legal and administrative measures.</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial</li> </ul>

Being expressly stipulated in the law (KVKK art. 5/2-a)		<p>and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled</p> <ul style="list-style-type: none"> <li>○ Performing account opening procedures</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> </ul>
	Communication Data	<ul style="list-style-type: none"> <li>○ Verification of client identity.</li> <li>○ Planning and executing the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ In order to comply with legal and administrative measures.</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled</li> <li>○ Evaluation of account opening requests</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> </ul>
	Finance Data	<ul style="list-style-type: none"> <li>○ Verification of client identity.</li> <li>○ Planning and executing the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> </ul>
	Transaction Security Data	<ul style="list-style-type: none"> <li>○ Verification of client identity.</li> <li>○ Planning and executing the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ In order to comply with legal and administrative measures,</li> </ul>

		<ul style="list-style-type: none"> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> <li>○ Keeping systematic records and reporting on the services provided</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> </ul>
	<b>Customer Transaction Data</b>	<ul style="list-style-type: none"> <li>○ Verification of client identity.</li> <li>○ Planning and executing the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> </ul>
	<b>Legal Transaction Data</b>	<ul style="list-style-type: none"> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions,</li> </ul>

		identifying clients who have made suspicious transactions,
	<b>Visual and Audio Data</b>	<ul style="list-style-type: none"> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> </ul>
<p>Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract (KVKK art. 5/2-c)</p>	<b>Identity Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes.</li> <li>○ Providing our services and verifying the identity of the customer in this context.,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services.</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Providing system security with customer account security,</li> <li>○ Making money inflows to customer accounts, making money outflows from customer accounts.</li> </ul>
	<b>Communication Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context.</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Execution of operational processes,</li> </ul>

		<ul style="list-style-type: none"> <li>○ Providing system security with customer account security,</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Making money inflows to customer accounts, making money outflows from customer accounts.</li> </ul>
	<b>Finance Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Execution of operational processes.</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Providing system security with customer account security,</li> <li>○ Making money inflows to customer accounts, making money outflows from customer accounts.</li> </ul>
	<b>Transaction Security Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Keeping systematic records and reporting on the services provided</li> <li>○ Execution of operational processes,</li> <li>○ Execution of customer support services processes,</li> <li>○ Providing system security with customer account security,</li> </ul>

	<b>Customer Transaction Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Execution of business processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Execution of operational processes,</li> <li>○ Protection of customer accounts and archives,</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Providing system security with customer account security,</li> <li>○ Making money inflows to customer accounts, making money outflows from customer accounts.</li> <li>○ Execution of relations management processes with representatives, suppliers and/or other business partners,</li> </ul>
	<b>Visual and Audio Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Protection of customer accounts and archives,</li> </ul>
It is mandatory for the data controller to fulfill its legal obligations (Art. 5/2-ç of the KVKK)	<b>Identity Data</b>	<ul style="list-style-type: none"> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Protection of customer accounts and archives,</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> </ul>

		<ul style="list-style-type: none"> <li>○ Resolving existing and future legal disputes,</li> <li>○ Planning and/or execution of business continuity activities,</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> <li>○ Execution of communication activities,</li> <li>○ Execution of storage and archiving activities,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled,</li> </ul>
	<b>Communication Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Protection of customer accounts and archives,</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Resolving existing and future legal disputes,</li> <li>○ Planning and/or execution of business continuity activities,</li> <li>○ Execution of operational processes,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled,</li> </ul>



	<b>Finance Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Protection of customer accounts and archives,</li> <li>○ Execution of finance and accounting works,</li> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Resolving existing and future legal disputes,</li> <li>○ Planning and/or execution of business continuity activities,</li> <li>○ Execution of operational processes,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled,</li> </ul>
	<b>Transaction Security Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Protection of customer accounts and archives,</li> <li>○ Execution of finance and accounting works,</li> </ul>

		<ul style="list-style-type: none"> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Resolving existing and future legal disputes,</li> <li>○ Planning and/or execution of business continuity activities,</li> <li>○ Execution of operational processes,</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> <li>○ Providing data is accurate</li> <li>○ Keeping systematic records and reporting on the services provided</li> </ul>
	<b>Customer Transaction Data</b>	<ul style="list-style-type: none"> <li>○ Execution of contract processes,</li> <li>○ Providing our services and verifying the identity of the customer in this context,</li> <li>○ Carrying out the necessary work and carrying out business processes in order to perform and execute the services and business activities offered and to benefit the relevant people from these services,</li> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Protection of customer accounts and archives,</li> <li>○ Execution of finance and accounting works,</li> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Resolving existing and future legal disputes,</li> <li>○ Planning and/or execution of business continuity activities,</li> <li>○ Execution of operational processes.</li> </ul>
		<ul style="list-style-type: none"> <li>○ In order to comply with legal and administrative measures,</li> </ul>

	<b>Legal Transaction Data</b>	<ul style="list-style-type: none"> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled,</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> <li>○ Resolving existing and future legal disputes,</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> </ul>
	<b>Visual and Audio Data</b>	<ul style="list-style-type: none"> <li>○ In order to comply with legal and administrative measures,</li> <li>○ Execution of customer support services processes,</li> <li>○ Arranging the information and documents that will be the basis for the work and transactions to be carried out,</li> <li>○ Complying with the information storage, reporting and informing obligations stipulated by all judicial and administrative authorities in accordance with the relevant legislation, ensuring that requests or decisions from these authorities are fulfilled</li> <li>○ Notifying these authorities for the purpose of investigating, detecting and preventing violations of the contract and the law.</li> <li>○ Resolving existing and future legal disputes,</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> </ul>
		<ul style="list-style-type: none"> <li>○ Execution of activities in accordance with the legislation,</li> </ul>

Data processing is mandatory for the legitimate interests of the data controller (Art. 5/2-f of the KVKK)	Identity Data	<ul style="list-style-type: none"> <li>○ Planning and/or execution of business continuity activities,</li> </ul>
	Communication Data	<ul style="list-style-type: none"> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Planning and/or execution of business continuity activities,</li> </ul>
	Transaction Security Data	<ul style="list-style-type: none"> <li>○ Keeping customer satisfaction at the highest level by measuring the performance of our systems,</li> <li>○ Ensuring the security of our website, mobile applications, other online applications and products,</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying customers and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> <li>○ Keeping systematic records and reporting on the services provided</li> </ul>
	Marketing Data	<ul style="list-style-type: none"> <li>○ Execution of new product and service offer processes,</li> <li>○ Execution of relations management processes with representatives, suppliers and/or other business partners.</li> </ul>
	Visual and Audio Data	<ul style="list-style-type: none"> <li>○ Carrying out the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation,</li> <li>○ Detection of suspicious transactions and fraud prevention, tracking fraud processes, identifying clients and detecting suspicious transactions, identifying clients who have made suspicious transactions,</li> </ul>
	Identity, Communication, Customer Transaction,	<ul style="list-style-type: none"> <li>○ Execution of marketing analysis studies and advertising / campaign / promotion processes,</li> <li>○ Execution of new product and service offer processes</li> </ul>

Explicit consent (KVKK art. 5/1)	Marketing Data	<ul style="list-style-type: none"> <li>○ Modelling, reporting, scoring, risk monitoring, intelligence, existing or new product studies and potential customer identification</li> <li>○ Execution of advertising/campaign/promotion processes.</li> </ul>
	Identity and Communication Data	<ul style="list-style-type: none"> <li>○ Sending information/marketing messages via SMS.</li> <li>○ Communication with customers through social media.</li> <li>○ Sending information/marketing messages via e-mail.</li> </ul>

#### 4. Transfer of Your Personal Data

Legal Reason	Personal Data Category	The Purpose of Transfer	Receiver
Being expressly stipulated in the law (KVKK art. 5/2-a)	Identity, Communication, Legal transaction, Visual and Audio records, Finance, Transaction Security and Customer Transaction Data	Providing information to authorized persons, institutions and organizations, executing risk management processes, following and executing legal affairs, fulfilling our legal obligations.	<ul style="list-style-type: none"> <li>○ Persons, institutions and/or organizations that are required/permitted by the laws and other legislation provisions and all kinds of public institutions and organizations and private institutions and organizations that are legally authorized to receive personal data, authorities, auditors, supervisory and regulatory institutions.</li> </ul>

<p>Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract (KVKK art. 5/2-c)</p>	<p>Identity, Communication, Legal transaction, Visual and Audio records, Finance, Transaction Security, Customer Transaction, Marketing Data</p>	<p>Follow-up and execution of legal affairs, legal evaluation of customers' requests and complaints, follow-up of requests/complaints, execution of information security processes, execution of communication activities, execution of contract processes, execution of customer relations management processes, execution of activities to ensure business continuity, execution of after-sales support services, legal evaluation of customer demands and complaints, execution of service production and operation processes, execution of audit activities, execution of risk management processes, execution of internal audit activities, execution of marketing analysis studies,</p>	<ul style="list-style-type: none"> <li>o Law, tax, etc. to carry out company activities. third parties from whom services, support and consultancy are received in the fields of sales, marketing, targeting activities and third parties that provide support in other fields,</li> <li>o Third parties from whom service is received,</li> <li>o With whom we cooperate; program partner institutions, organizations, domestic/foreign banks, representatives, funds, cooperating institutions,</li> <li>o Domestic/foreign/international organizations/individuals from whom service/support/consultancy is received or project/program/financing partner is received, and to organizations/individuals from whom independent audit and support services are received.</li> </ul>
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It is mandatory for the data controller to fulfill its legal obligations (Art. 5/2-ç of the KVKK)	Identity, Communication, Legal transaction, Visual and Audio records, Finance, Transaction Security and Customer Transaction Data	Providing information to authorized persons, institutions and organizations, executing risk management processes, following and executing legal affairs, fulfilling our legal obligations.	<ul style="list-style-type: none"> <li>Persons, institutions and/or organizations that are required/permitted by the laws and other legislation provisions and all kinds of public institutions and organizations and private institutions and organizations that are legally authorized to receive personal data, authorities, auditors, supervisory and regulatory institutions.</li> </ul>
	Identity, Communication, Legal transaction, Visual and Audio records, Finance, Transaction Security, Customer Transaction, Marketing Data	Follow-up and execution of legal affairs, legal evaluation of customers' requests and complaints, follow-up of requests/complaints, execution of information security processes, execution of communication activities, execution of contract processes, execution of customer relations management processes, execution of activities to ensure business continuity, execution of after-sales support services, legal evaluation of customer demands and complaints, execution of service production and operation processes,	<ul style="list-style-type: none"> <li>Law, tax, etc. to carry out company activities. third parties from whom services, support and consultancy are received in the fields of sales, marketing, targeting activities and third parties that provide support in other fields,</li> <li>Third parties from whom service is received,</li> <li>With whom we cooperate; program partner institutions, organizations, domestic/foreign banks, representatives, funds, cooperating institutions,</li> <li>Domestic/foreign/international organizations/individuals from whom service/support/consultancy is received or project/program/financing partner is received, and to organizations/individuals from whom independent audit and support services are received.</li> </ul>

		execution of audit activities, execution of risk management processes, execution of internal audit activities, execution of marketing analysis studies,	
Data processing is mandatory for the legitimate interests of the data controller	<b>Identity, Communication, Legal transaction, Visual and Audio records, Finance, Transaction Security, Customer Transaction, Marketing Data</b>	Providing information to authorized persons, institutions and organizations, executing risk management processes, following and executing legal affairs, fulfilling our legal obligations.	<ul style="list-style-type: none"> <li>o Persons, institutions and/or organizations that are required/permitted by the laws and other legislation provisions and all kinds of public institutions and organizations and private institutions and organizations that are legally authorized to receive personal data, authorities, auditors, supervisory and regulatory institutions.</li> </ul>



(Art. 5/2-f of the KVKK)	<b>Identity, Communication, Legal transaction, Visual and Audio records, Finance, Transaction Security, Customer Transaction, Marketing Data</b>	Follow-up and execution of legal affairs, legal evaluation of customers' requests and complaints, follow-up of requests/complaints, execution of information security processes, execution of communication activities, execution of contract processes, execution of customer relations management processes, execution of activities to ensure business continuity, execution of after-sales support services, legal evaluation of customer demands and complaints, execution of service production and operation processes, execution of audit activities, execution of risk management processes, execution of internal audit activities, execution of marketing analysis studies,	<ul style="list-style-type: none"> <li>o Law, tax, etc. to carry out company activities. third parties from whom services, support and consultancy are received in the fields of sales, marketing, targeting activities and third parties that provide support in other fields,</li> <li>o Third parties from whom service is received,</li> <li>o With whom we cooperate; program partner institutions, organizations, domestic/foreign banks, representatives, funds, cooperating institutions,</li> <li>o Domestic/foreign/international organizations/individuals from whom service/support/consultancy is received or project/program/financing partner is received, and to organizations/individuals from whom independent audit and support services are received.</li> </ul>
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<p>Explicit consent (KVKK art. 5/1)</p>	<p><b>Identity, Communica tion Data</b></p>	<p>Follow-up and execution of legal affairs, legal evaluation of customers' requests and complaints, follow-up of requests/complaints, execution of information security processes, execution of communication activities, execution of contract processes, execution of customer relations management processes, execution of activities to ensure business continuity, execution of after-sales support services, legal evaluation of customer demands and complaints, execution of service production and operation processes, execution of audit activities, execution of risk management processes, execution of internal audit activities, execution of marketing analysis studies,</p>	<ul style="list-style-type: none"> <li>o To the İleti Yönetim Sistemi Anonim Şirketi <a href="https://iys.org.tr/">https://iys.org.tr/</a>)</li> </ul>
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	<b>Identity, Communication, Legal transaction, Visual and Audio records, Finance, Marketing Data</b>	Carrying out marketing activities, reporting, existing or new product studies and potential customer identification, execution of advertising/campaign/promotion processes,	<ul style="list-style-type: none"> <li>o To our group companies, subsidiaries, shareholders, business partners and representatives</li> </ul>
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PAYPOLE takes all necessary technical and administrative measures in case your personal data is transferred at home or abroad. PAYPOLE will use reasonable efforts to ensure that such third parties take the necessary technical and administrative measures to protect the personal data transferred.

## 5. Protection, Storage and Disposal of Your Personal Data

PAYPOLE takes all necessary technical and administrative measures to prevent unauthorized access to your personal data, incorrect processing, disclosure, alteration/deletion of your personal data for unlawful reasons, and to ensure its protection and security. In the event that your personal data is damaged and/or seized/disclosed by third parties as a result of attacks on the archive and/or servers and/or other systems containing your personal data processed by PAYPOLE, PAYPOLE will inform the relevant persons and the Personal Data Protection Board within 72 hours after being informed of the violation.

Your personal data will be stored for 10 years from the expiry of the contract you have concluded. In cases where you do not have a contractual relationship with PAYPOLE, your personal data will be stored for a reasonable period of time required for the purpose of processing. If there are storage periods stipulated by legal regulations regarding the storage of your personal data within the scope of the relevant processing process, your data will not be deleted during the said periods.

In the event that the above-mentioned periods expire, the period stipulated in the relevant legal regulation or required for the purpose for which it was processed expires, or in the event that the deletion request of the person concerned is positive, your personal data will be deleted, destroyed or anonymized in accordance with the protection of data legislation in accordance with PAYPOLE Personal Data Protection and Confidentiality Procedure and Personal Data Storage and Destruction Procedures.

## **5. Your Rights Under Article 11 of the Law**

By applying to PAYPOLE, you have the right to:

- 5.1 learn whether personal data is processed;
- 5.2 request information if personal data has been processed;
- 5.3 learn the purpose of processing personal data and whether they have been used in accordance with the purpose;
- 5.4 be informed of the third parties from which personal data is transferred domestically or abroad;
- 5.5 request personal data to be corrected if it is incompletely or improperly processed;
- 5.6 request the deletion or destruction of personal data within the framework of the conditions stipulated in the Article 7 of the Law;
- 5.7 requesting the transactions made in accordance with paragraphs (5.5) and (5.6) to be notified to third parties to whom personal data has been transferred;
- 5.8 object to the appearance of a result against you by analyzing the processed data exclusively through automated systems;
- 5.9 claim to recover damages in case of damage caused by illegal processing of personal data.

## **6. The Data Controller You Can Refer To**

Your claims within the scope of your right stated under previous article (within the scope of Article 11 of the Law) can be made:

6.1 personally to the address of PAYPOLE written below with information confirms your identity;

6.2 with secure electronic signature, mobile signature or your current electronic mail address notified to PAYPOLE and saved in the PAYPOLE system to the PAYPOLE's [kvkk@paypole.com](mailto:kvkk@paypole.com) address.

In your applications made according to the abovementioned procedure:

- your name, surname, date and signature if the application is written;
- 11-digit TR ID number if you're a Turkish citizen;
- your residence permit and ID number, if you are not a Turkish citizen;

- your residence or work place address subject to the notification;
- your electronic mail address subject to the notification and telephone number, if any;
- request subject.

shall be definitely included, and all information and documents relating to your request should be legibly added to your application.

Your application will be accepted following ID authentication to be made by PAYPOLE and will be answered in writing or in electronic form within 30 days at the latest. We would very much like to point out that for written applications the date when the documents are delivered to PAYPOLE and for applications made with other methods the date when the application is delivered to PAYPOLE will be considered as the application date. The response to your applications is essentially a free of charge process and if the response process requires a cost, the fee will be reflected to you within the scope of the legislation or in the tariff determined/to be determined administratively.

**Trade Registry No:** 319965-5 **Mersis No:** 0723083379900001

**Company Title:** PAYPOLE ÖDEME HİZMETLERİ VE ELEKTRONİK PARA A.Ş

**Address:** Esentepe Mah. Büyükdere Cad. Öz sezen İş Merkezi A Blok No:122 K:8 Şişli /İstanbul

**The website address:** [www.paypole.com](http://www.paypole.com) **The KEP address:** [paypole@hs06.kep.tr](mailto:paypole@hs06.kep.tr)