

PAYPOLE ÖDEME HİZMETLERİ VE ELEKTRONİK PARA ANONİM ŞİRKETİ

PERSONAL DATA PROTECTION AND PROCESSING POLICY

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.

With this Personal Data Protection and Processing Policy "Policy", the personal data obtained in accordance with the Law and listed in detail in Article 1 of this Policy, belonging to the real person data owners listed below by (Paypole) acting as the data controller and it is aimed to inform you by making explanations regarding the processing and protection in accordance with.

Paypole, KVK Policy aims to establish the necessary systems and ensure compliance with the legislation in line with the aim of raising awareness about the legal processing and protection of personal data within PAYPOLE. Paypole, in accordance with its obligations in the Law and in accordance with the law and honesty It informs data owners and those concerned on its website www.paypole.com via a publicly available clarification text that it carries out data processing activities in accordance with the rules. Users (referred to as Real Customers), potential users (potential customers (referred to as), Paypole shareholders, officers, employees and employee candidates, business partners shareholders, officers and employees, representative shareholders, officers and employees, visitors and all other relevant third parties, as data owners, within the scope of application of this Policy. There are Paypole revises this Policy from time to time in order to comply with legislative changes can change and update time.

1. DEFINITIONS

Explicit Consent	Freely given, specific and informed consent
Anonymization	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data
Employee	Paypole's personnel
Service Provider	Natural or legal person who provides services within the framework of a contract concluded with Paypole

Data Subject	Natural person whose personal data are processed
Destruction	Deletion, destruction or anonymization of personal data.
Law	Personal Data Protection Law No. 6698
Personal Data	any information relating to an identified or identifiable natural person,
Processing of personal data	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof
Special categories of personal data	Data regarding people's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data
Periodic Destruction	If all the conditions for processing personal data specified in the law are eliminated, the deletion, destruction or anonymization process specified in the personal data storage and destruction policy will be carried out ex officio at recurring intervals.
Policy	Personal Data Protection And Processing Policy
Data Processor	The natural or legal person who processes personal data on behalf of the data controller upon its authorization
Data filing system	The system where personal data are processed by being structured according to specific criteria
Data Controller	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
Regulation	Regulation On Deletion, Destruction Or Anonymization Of Personal Data

2. PERSONAL DATA PROCESSED BY PAYPOLE

Category of Data	Data
Identity Data	Name-surname, TR ID number, identity card information, criminal record information, certified population registration information, residence information, driver's license information, CV information, etc.
Communication Data	Mobile phone number, e-mail address, residence address, residence permit.
Data on Family Status	Information about people's families and relatives will be included in this category. It does not matter whether the relevant person belongs to a customer, employee or other data subject category.
Data on Education, Business and Professional Life	All kinds of data regarding people's education and working lives will be included in this category.
Corporate Data	Title, tax number, tax plate, signature circular, company manager and employee information, etc.
Data on Risk Management and Financial Security	Within the scope of risk management processes, all information that can be used within the scope of KYC (Know Your Customer Principles), AML (Prevention of Money Laundering) and Antifraud (Fraud Prevention) financial security and risk management activities will be evaluated within this data category.
Payment Service User/Client	Individuals or organizations or persons associated with them who benefit from any product or service of Paypole.
Supplier	Individuals, organizations or persons associated with them who provide goods or services from Paypole.
Business partner	These are the people, organizations or persons associated with Paypole that it cooperates with.
External Service Provider	They are individuals, organizations or persons associated with them who provide services that are an extension or complement of Paypole services.
Representative Data	Representative name, surname, address, etc.

Provider Data	Provider name, provider code, beneficiary code, VAT declaration registration document, financial scheme information, service information (service name, service type, service code, service tariff plan), etc.
Users Data	Username and surname, user group information, user password, etc.
Finance Data	Bank account information account number, IBAN number, balance information.
Legal Transaction Data	Contracts, court and administrative authority documents, etc.
User Transaction Data	Transaction date, transaction type, transaction amount, place of transaction, method of transaction, transaction type
Physical Location Security Data	Entry and exit log records, visitor records, camera records, fingerprint control records, etc.
Personal Data	Payroll information, SGK information, annual leave-excuse reports, change of duty forms, employment contracts, information security commitments and all kinds of information and documents that need to be included in the personnel file
Employee Data	Benefit information, performance evaluation reports, e-mail tracking information, etc.
Employee Candidate Data	CV, interview notes, personality inventory records, etc.
Request/Complaint Management Data	All kinds of requests and complaints submitted by users, all kinds of comments added during the transaction and all kinds of records and reports related to them.

3. PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Paypole processes personal data for the purposes specified in the "Clarification Text" within the scope of its activities.

Personal Data can only be processed by Paypole within the scope of the procedures and principles specified in this Policy.

Paypole Personal data collected by Paypole in accordance with Articles 1 and 2 of the Law will be processed for the purposes explained in detail below and within the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law. Paypole declares and undertakes to comply with the following principles during the processing of this data.

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- Paypole will comply with the law and the rules of honesty in all personal data processing processes.
- Paypole, as the data controller, will ensure that all personal data it processes are accurate and kept up to date.
- Paypole, as the data controller, will keep data processing activities relevant, proportionate and limited to legitimate purposes.
- Paypole, as the data controller, will process the personal data it obtains in a limited and measured manner in connection with the processing purpose notified to the data owner.
- Paypole, as the data controller, will retain any personal data it processes for the period stipulated in the relevant legislation or required for the purpose for which it was processed.

4. COLLECTION METHOD OF PERSONAL DATA

Personal data specified in detail in Article 2 of this Policy; including, but not limited to, direct human resources processes, direct representatives, providers and/or business partners, connection information recorded in accordance with the legislation while using our website and social media accounts, contact forms you fill out electronically, other forms you fill out in our workplaces, offices and representatives, and the information and documents you have shared with our Company through written or verbal communications via online channels, e-mails you have sent to our Company via the e-mail system, information and documents you have sent to our Company through means such as faxes or letters, via telephone channel via call center or directly to our Company and/or the information and documents you share in your conversations with our business partners and representatives, any contract you have signed with our Company and the personal data you share verbally, in writing or electronically in any other way, partially or fully, by automatic or non-automatic methods, pursuant to Article 1 and 2 of the Law. It is collected in accordance with Article

5. THE PURPOSE OF PROCESSING YOUR PERSONAL DATA

Personal data specified by Paypole in Articles 1 and 2 of the Law and listed in detail in Article 2 of this Policy shall be processed by Paypole in accordance with the following financial and personal data processing conditions and purposes specified in Articles 5 and 6 of the Law/or may be operated, transferred and maintained by real and legal persons, including units with which Paypole cooperates or is authorized.

- Planning and executing the necessary operational activities to ensure that our services and activities are carried out in accordance with the relevant legislation
- 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.
- Sharing information regarding the services offered by Paypole, where current campaigns and payment tools can be used, and which will be especially useful for customers to use the payment service more broadly and effectively.,

- Ensuring the legal, technical and commercial occupational safety of Paypole and the relevant persons in business relations with it,
- Communicating with relevant persons within the scope of other contracts or commercial relations,
- Planning and/or execution of audit activities,
- Providing information to authorized institutions,
- Ensuring operational safety
- Planning, auditing and execution of information security processes,
- Establishing and managing information technology infrastructure
- Execution of finance and accounting works,
- Following up legal processes, fulfilling legal obligations,
- Carrying out communication and correspondence with authorized institutions,
- Following up customer request and/or complaints
- Following up contract processes and/or legal requests,
- Execution of customer relationship management,
- Execution of relations management processes with representatives, providers and/or other business partners
- Planning and/or execution of access authorizations of representatives, providers and/or other business partners,
- Planning and ensuring customer satisfaction activities,
- Ensuring that data is accurate and up-to-date
- Keeping systematic records and reporting on the services provided
- Planning and/or execution of analyzes regarding business activities,
- Planning and/or execution of occupational health and safety processes,
- Planning and/or execution of business continuity activities,
- Planning and/or execution of human resources processes and needs,
- Managing processes related to personnel employment
- Planning and/or execution of fringe benefits and benefits for employees,
- Planning and/or monitoring employee performance evaluation processes,
- Planning and/or execution of employee access rights,
- Ensuring the security of the company campus, fixtures and resources,
- Execution of all other operational activities that may occur.

6. CONDITIONS FOR PROCESSING PERSONAL DATA

Personal data collected in accordance with Articles 1 and 2 of the Law and listed in detail in Article 2 of this Policy may be included in any processing process by Paypole in line with the explicit consent of the data owner. Apart from explicit consent, personal data may be processed if one of the conditions specified in the law is met. The basis for personal data processing may be only one of the conditions listed below, or more than one of these conditions may be the basis for the same personal data processing activity.

Processing Conditions	Scope	Example
Laws Provision	Tax Legislation, Labor Legislation, Trade Legislation etc.	Employee personal information must be kept in accordance with the legislation.
Contract execution	Employment Agreement, Sales Agreement, Representation Agreement, Power of Attorney Agreement, etc.	For delivery, the company Saving address information
Actual Impossibility	A person who is unable to give consent due to actual impossibility or who does not have the power to discriminate.	Contact or address information of the unconscious person. Location information of a kidnapped person.
Legal Liability of the Data Controller	Financial Audits, Security Legislation, Compliance with Sector-Focused Regulations.	Sharing information in audits specific to areas such as TCMB
Publicity	The relevant person submits his/her own information.	Posting the person's contact information to be reached in case of emergency.
Establishment, Protection and Use of Rights	Filing a lawsuit, registration procedures, all kinds of title deed transactions, etc. Data that must be used in business.	Keeping the necessary information about an employee who has left the job throughout the statute of limitations.
Legitimate Interests	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	Processing data for the purpose of applying rewards and bonuses that increase employee loyalty.

These data may be processed by Paypole even without explicit consent in the following cases, in accordance with Article 5 of the Law: It is expressly provided for by the laws,

- It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- 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,
- Personal data have been made public by the data subject himself/herself
- Data processing is necessary for the establishment, exercise or protection of any right

- 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 relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data are deemed to be special categories of personal data. These data may be included in any processing process by Paypole in accordance with the explicit consent of the data owner. These data may be processed by Paypole even without explicit consent in the following cases, in accordance with Article 6 of the Law:

- In terms of special personal data other than data regarding health and sexual life; In cases where it is clearly provided for by law,
- In terms of data regarding health and sexual life; In cases where it is processed by persons or authorized institutions and organizations under the obligation of confidentiality, for the purpose of protection of public health, preventive medicine, medical diagnosis, execution of treatment and care services, planning and management of health services and their financing

7. TRANSFER OF PERSONAL DATA

Personal data collected in accordance with Articles 1 and 2 of the Law and listed in detail in Article 2 of this Policy may be subject to domestic and international transfer processes by Paypole in line with the explicit consent of the data owner. This data will be processed by Paypole in accordance with the processing purposes detailed in Article 4 of this Policy and in accordance with the Law in Article 5 of this Policy, our subsidiaries and shareholders, in case one of the processing conditions listed separately for personal data and special categories of personal data is met. , our business partners, representatives, service providers, auditors, legally authorized public institutions and organizations and private institutions and organizations, professional organizations and similar organizations, supervisory and regulatory authorities, private persons permitted by the legislative provisions and other persons and organizations in accordance with Article 8 of the Law. and may be shared and transferred within the framework of the transfer conditions and purposes of personal data specified in Articles 9. In the transfer of this data abroad without explicit consent; In addition to the conditions explained above, in accordance with Article 9 of the Law; In the foreign country to which the data will be transferred, -adequate protection must be present, -if there is not sufficient protection, Paypole and the data controller in the relevant foreign country must undertake adequate protection in writing and the Board's permission will be required.

8. STORAGE PERIOD OF PERSONAL DATA

Natural and legal entities, including Paypole and/or representatives cooperated with or authorized by Paypole, without prejudice to the cases where it is permitted or required to retain personal data for a longer period of time in accordance with the relevant legislation;

retains personal data only for a certain period of time in accordance with the processing purposes and commercial practices stipulated in the relevant legislation and reported in this Policy. If the purpose of data processing is no longer possible, data controller deletes, destroys or anonymizes this data ex officio or upon the request of the data owner.

9. SECURITY OF PERSONAL DATA

Paypole provides technical services within the framework of adequate measures determined and announced by the Board for special personal data in accordance with Article 12 of the Law and the fourth paragraph of Article 6 of the Law, in order to safely store personal data, prevent unlawful processing and access of personal data, and destroy personal data in accordance with the law. and administrative measures are taken. Paypole declares and undertakes that it has taken all kinds of technical and administrative measures, including the necessary security measures, to protect systems containing personal data against unauthorized access and unlawful transactions, that it shows the highest level of care and attention in this regard, and that it carries out or has the necessary inspections carried out in this context. Despite Paypole taking the necessary measures, if personal data is damaged or obtained by third parties through illegal means, Paypole is obliged to immediately notify the data owner and the Board (Personal Data Protection Board).

10. DATA SUBJECT'S RIGHTS

By applying to PAYPOLE, you have the right to:

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

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

- 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 info@paypole.com address.

- personally to the address of PAYPOLE written below with information confirms your identity;
- You can send it via KEP from your Registered Electronic Mail (KEP) account to@....kep.tr.

If a request is made by a third party on behalf of the personal data owner, you must also submit a power of attorney issued through a notary on behalf of the person making the 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.

In cases where the personal data owner's application is rejected in accordance with Article 14 of the Law, the answer given is insufficient, or the application is not responded to in a timely manner; He/she has the right to file a complaint with the Board (Personal Data Protection Board) within thirty days from the date of learning the answer and in any case within sixty days from the date of application.

11. CASES WHERE THE DATA OWNER CAN NOT ASERVE HIS RIGHTS

Data owners within the scope of application of this Policy, in the cases listed below, Article 28/1 of the Law. Since they are excluded from the scope in accordance with the article, they cannot assert their rights explained in Article 9 against the Organization:

- Personal data are processed for official statistics and provided that they are being anonymized for the purposes for such as research, planning and statistics,
- Personal data are processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or the process doesn't constitute a crime.
- Personal data are processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorised and assigned by law to maintain national defence, national security, public security, public order or economic security,
- Personal data are processed by judicial authorities or execution authorities with regard to investigation, prosecution, judicial or execution proceedings.

However, data owners within the scope of application of this Policy may comply with Article 28/2 of the Law in the cases listed below. In accordance with the article, they cannot assert their other rights against Paypole, except the right to demand compensation for damages, which are among the rights explained in Article 9:

- is necessary for the prevention of committing a crime or for crime investigation
- is carried out on the data which are made public by the data subject himself/herself.
- is necessary for performance of supervision or regulatory duties and disciplinary investigation and prosecution to be carried out by the assigned and authorised public institutions and organizations and by public professional organizations, in accordance with the power conferred on them by the law,
- is necessary for protection economic and financial interests of State related to budget, tax and financial matters.

12. DESTRUCTION (DELETION, DESTRUCTION AND ANONYMIZATION) CONDITIONS OF PERSONAL DATA

In accordance with Article 138 of the TCK, Article 7 of the Personal Data Protection Law and the "Regulation on Deletion, Destruction and Anonymization of Personal Data" issued by the Board, Paypole's use of Paypole in the event that the reasons requiring processing are eliminated, even though it has been processed in accordance with the provisions of the relevant law. Personal data is deleted, destroyed, or made anonymous based on its own decision or upon the request of the personal data owner.

Reasons Requiring Destruction:

Personal Data;

Amendment or abolition of the relevant legislative provisions that constitute the basis for its processing,

- The purpose requiring processing or storage is eliminated,
- In cases where personal data is processed only on the basis of explicit consent, the relevant person withdraws his/her explicit consent,
- Paypole accepts the application made by the relevant person regarding the deletion and destruction of his personal data within the framework of his rights in accordance with Article 11 of the Law,
- In cases where Paypole rejects the application made to it by the relevant person requesting the deletion, destruction or anonymization of his personal data, finds the answer given insufficient, or does not respond within the time period stipulated in the Law; Complaining to the Board and this request being approved by the Board,
- In cases where the maximum period requiring the storage of personal data has passed and there are no conditions that would justify storing personal data for a longer period of time, it is deleted, destroyed or anonymized by Paypole upon the request of the relevant person.

13. PERIODIC DESTRUCTION PERIOD

In accordance with the regulation, Paypole has determined the periodic destruction period as 6 months. Accordingly, periodic destruction is carried out every year in June and December.

14. PUBLICATION OF THE POLICY

The policy is available via PAYPOLE internet via e-mail.

15. UPDATED PERIOD OF THE POLICY

The policy is reviewed at least once a year and whenever necessary, and the necessary sections are updated.

16. ENFORCEMENT OF THE POLICY

This Policy entered into force on 28/09/2021.