

CLARIFICATION TEXT ON PERSONAL DATA PROCESSING

1- INTRODUCTION

Birlesik Odeme Hizmetleri ve Elektronik Para A.S. (shall hereinafter be referred to as "United Payment" or the "Company") exercises utmost attention and care as required for ensuring the privacy and security of any personal data it collects and processes. Accordingly, United Payment takes the administrative and technical measures as required for protecting your personal data during the course of performance of all of your transactions, and it processes your personal data in accordance with the terms and conditions as described herein below and also within the limits as prescribed by the Law and such other applicable regulations.

Section 10, with the heading "Obligation to Inform", of the Law Nr.6698 on Protection of Personal Data requires that any individual, whose personal data is processed, must be informed by the data controllers. As per the provisions of the Law on Protection of Personal Data, United Payment acts as the data controller in terms of any personal data it possesses.

This Clarification Text has been drawn up for the purpose of informing the data subjects about the identity of our Company, acting as the data controller, and the purposes of processing personal data, the persons to which personal data is transferred and the purposes of such transfer, the legal grounds for collecting personal data, the recipients of such processed personal data and the methods for such transfer, and also the rights that might be raised to the data controller by a data subject, such as updating, deletion or anonymization, as listed in Section 11 of the said Law.

2- IDENTITY OF THE DATA CONTROLLER

Data Controller is defined as **"Any real or legal person, which determines the purposes and means of processing of any personal data and which is responsible for the establishment and management of the data recording system"** under the sub-paragraph (i) of Section 3/1 of the Law on Protection of Personal Data. Accordingly, our Company acts as the data controller in terms of some data.

The contact details of our Company, acting as the Data Controller, are as follows:

Address: Esentepe Mah. Buyukdere Cad.No:102 /14 Maya Akar Center B Blok K: 3 Sisli /
Istanbul – Türkiye

E-mail: info@unitedpayment.com

Website: www.unitedpayment.com

3. YOUR PROCESSED PERSONAL DATA

Your personal data, you will have shared with United Payment and which consists of;

- 1) Identity Details: Full name, passport number, date of birth, nationality,
- 2) Contact Details: Mobile Phone Number
- 3) Customer Transaction Details: IBAN, customer's card number, customer's account balance, transaction limit, risk details
- 4) Transaction Security Details: IP Address, login and log out details, code and password details
- 5) Visual and Audio Details: Photograph, Voice Record
- 6) Location details: Details about the location where the data subject is situated
- 7) Biometric Data: Dynamic selfie

may be processed in connection with the payment services as per the Law Nr.6493 on Payment and Security Settlement Systems, Payment Services and Electronic Money Institutions and the secondary regulations thereto and in accordance with the term and conditions for processing personal data as specified in Sections 5 and 6 of the Law on Protection of Personal Data.

4. PURPOSES AND LEGAL GROUNDS OF PROCESSING PERSONAL DATA

Purposes of Processing Data	Personal Category Data	Legitimacy Grounds on which the Processing is Based
Validly execution of the service agreement	Identity details Contact details	If and when such processing is directly related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by the Company and/or such processing is expressly specified by the law

Accomplishment of your membership to the application and performance of user authentication	Identity details Contact details	If and when such processing is directly related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by the Company
Initiation of your money loading transaction	Identity details Contact details Customer transaction details	If and when such processing is directly related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by the Company and/or such processing is expressly specified by the law
Loading of the equivalent amount in Turkish Liras of the amount in Rubles, you wish to load, into your virtual wallet	Identity details Contact details Customer transaction details	If and when such processing is directly related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by the Company
Creation of your virtual card and enabling the performance of the payment and cash withdrawal transactions by making use of the card	Identity details Contact details Customer transaction details Transaction security details	If and when such processing is directly related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by

		the Company and/or such processing is expressly specified by the law
Receipt and follow-up of your inquiries and complaints	Identity details Contact details Customer transaction details	If and when such processing is directly related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by the Company and/or such processing is expressly specified by the law
Operation of the compliance program regulation, in particular the financial security processes, namely KYC (Know Your Customer), AML (Anti-Money Laundering), anti-fraud, and also management of the compliance process, and management of the statutory business processes such as combating such other unlawful transactions	Identity details Contact details Customer transaction details	If and when such processing is mandatory and specified expressly by the law for the purpose of fulfillment of its statutory obligation by the Company
Administration of the risk management and internal control processes, ensuring financial and business data security at the highest level, establishment of an information technology infrastructure and databases appropriate to the foregoing and taking the administrative and technical measures, in particular in respect of the electronic services	Identity details Contact details Customer transaction details	If and when such processing is mandatory and specified expressly by the law for the purpose of fulfillment of its statutory obligation by the Company
Cash withdrawal from ATM by	Identity details	If and when such processing is directly

making use of QR Code	Location details	related to execution or performance of an agreement and/or required for the purpose of fulfillment of its statutory obligation by the Company and/or such processing is expressly specified by the law
Performance of a dynamic selfie for the purpose of authentication/identity verification	Identity details Biometric data	Explicit consent

5. THE METHOD OF COLLECTION OF YOUR PERSONAL DATA BY US AND THE LEGAL GROUND THERETO

Your personal data shall be collected through;

- the mobile application,
- the call center,
- the communication form available on our website,

provided by our Company, by making use of automated or non-automated means.

6. OUR PRINCIPLES REGARDING PROCESSING PERSONAL DATA

In respect of your personal data, we, as United Payment, are committed to (a) processing your personal data in compliance with the law and the principles of integrity, (b) ensuring accuracy and up-to-dateness, (c) processing such data for certain, clear and legitimate purposes, (ç) ensuring that such processing is relevant, limited and proportionate to the purpose for which such data is processed, and (d) storing such personal data up to the period as stipulated under the applicable regulations or as required for the purpose for which such data is processed.

Data minimization matters to us.

7. TO WHOM AND FOR WHAT PURPOSE IS SUCH PROCESSED PERSONAL DATA TRANSFERRED?

Your personal data, collected and processed by our Company in accordance with the Law on Protection of Personal Data, may be transferred to;

- a. the BDDK (Banking Regulation and Supervision Agency), MASAK (Financial Crimes Investigation Board), the Central Bank of the Republic of Türkiye, the governmental agencies or private organizations/institutions, which are authorized by the law, for the purpose of fulfillment of the obligations such as risk management, reporting, accounting, internal control and audit, compliance which are imposed on United Payment by the applicable regulations that govern United Payment, in particular Law Nr.6493 on Payment and Security Settlement Systems, Payment Services and Electronic Money Institutions, the Law 5549 on Prevention of Laundering of Proceeds of Crime, and the Decree Law Nr.660 on the Organization and Duties of the Public Oversight, Accounting and Auditing Standards Authority;
- b. domestic goods and service providers, business and solution partners and consultants for the purpose of procurement of the administrative, financial, legal and technical materials and services as required by the Company and in accordance with the non-disclosure agreements;
- c. public legal entities or judicial authorities due to the lawsuits and legal proceedings, in which we are involved, for the purpose of establishment, protection and exercise of a right;
- d. the company, called Sanction Scanner, for the purpose of performance of the international sanctions check, and to the company, called OCR Labs, for the purpose of performance of authentication/identity verification.

The Company shall follow up any and all steps and take any and all measures as required by the applicable regulations, in particular the LPPD (the Law on Protection of Personal Data), if and when your personal data is transferred to any third party that is situated domestically or internationally.

8. PROTECTION OF YOUR DATA AND RETENTION PERIOD

United Payment takes any and all measures, both technical and administrative, for the purpose of protecting the personal data it collects and preventing the capturing of any such data by unauthorized persons and ensuring that our customers and prospective customers do not suffer any grievance. Accordingly, it is ensured that our Privacy and Information Security Policies, which include the sets of the administrative and technical measures such as the employing software in conformance with the standards and the use of up-to-date firewalls and anti-virus systems against cyber-attacks and diligently selection of the third parties and ensuring the access and authorization controls, are observed and complied with internally.

Upon the expiration of the agreement, executed by and between our Company and you, Your Personal Data shall be deleted, anonymized or disposed of either ex officio or in line with your request unless otherwise required as per the Law Nr.6493 on Payment and Security Settlement Systems, Payment Services and Electronic Money Institutions, the Law 5549 on Prevention of Laundering of Proceeds of Crime, and the Decree Law Nr.660 on the Organization and Duties of the Public Oversight, Accounting and Auditing Standards Authority, and such other applicable regulations. However, your data shall be stored for such specified periods if and when it is prescribed by the applicable laws and regulations that such

data must be stored for a certain period. Upon the elapse of such period, your data shall be deleted ex officio or in line with your request.

9. RIGHTS OF THE DATA SUBJECTS AND APPLICATION

In the event that you, as the data subject, submit a request with respect to your rights as listed in Section 11 of the Law on Protection of Personal Data to our Company by means of the methods set out hereunder, then, your request shall be concluded free of charge within a period of thirty days, at the latest, depending on the nature of such request.

Furthermore, since it is stipulated as per the applicable regulations that any application with respect to personal data is required to be submitted personally by the data subject, only the portion, which is relevant to you, of your application shall be replied, and any application, which is submitted about your spouse, any of your relatives or friends, shall not be accepted.

Accordingly, you shall be entitled to (a) inquire whether any personal data has been processed or not, (b) ask for information about your personal data, if it has been processed, (c) be informed about the purpose of processing of any personal data, and also about the fact that whether such data has been used as appropriate to the purpose thereto, (d) be informed about any third party to which any personal data has been transferred either domestically or internationally, (e) ask for correction of any imperfect or inaccurate personal data, in case of any imperfect or inaccurate processing thereof, and to ask for providing information about the processes, performed for such purpose, to the third parties, to which such personal data has been transferred, (f) ask for deletion or disposal of any such personal data if the reasons requiring processing of any such data ceased to exist in spite of the fact that any such personal data has been processed in accordance with the provisions as prescribed under the Law on Protection of Personal Data and such other applicable laws, and accordingly, to ask for providing information regarding the processes, performed for such purpose, to the third parties to which any such personal data has been transferred, (g) raise an objection against such outcome in case of emergence of an outcome that is to the detriment of you upon the analysis of any such processed personal data solely by any automatic systems, and (h) claim for compensation of any damage and/or loss, you might have incurred in the event that any such personal data has been processed in breach of the law, by submitting an application to our e-mail address as given hereunder by United Payment.