

## 1. Purpose

KLASFX Company ("KLASFX" or "Company") aims to process the personal data of its real person customers in accordance with the Personal Data Protection Law No. 6698 ("KVK Law") and other legislative provisions.

Since you are a natural person customer of our Company, your personal data that you have reported/will notify to our Company and/or obtained by our Company in any external way, will be processed by our Company in the capacity of "Data Controller".

- Within the framework of the purpose that requires processing of your personal data and in connection with this purpose, in a limited and measured manner,
- By maintaining the accuracy and most up-to-date version of personal data as you have reported or are notified to our company,
- It will be recorded, stored, maintained, rearranged, shared with institutions authorized to request this personal data by law, and transferred to domestic or international third parties, transferred, classified and processed in other ways listed in the KVK Law, under the conditions stipulated by the KVK Law, and We inform you that you may be subject to other transactions listed in the KVK Law.

With the Information Text, it has been adopted that the activities carried out by KLASFX will be continued and developed in accordance with the principles in the KVK Law.

## 2. Collection and Procedure of Personal Data of Real Person Customers

Our company will process your personal data for the purposes specified in this Information Text. If there is any change in the purpose of processing your personal data, you will also obtain permission.

The personal data of employees collected and used by our company are particularly:

### Identity Data:

Name-surname, T.R. Documents such as driver's license, copy of identity card containing information such as identity number, tax identification number, nationality information, mother's name, father's name, place of birth, date of birth, gender, and signature/initials information.

### Communication Data:

Telephone number, fax, full address information, e-mail address (including extension number and corporate e-mail address).

### Financial Data:

Information such as capital type, account status, partnership percentage, annual interest, bank code, credit information, debt information,

### Special personal data:

- Blood group,
- Blood type and religion section on the identity card

#### Legal Transaction Data:

Personal data processed within the scope of determination and follow-up of legal receivables and rights and fulfillment of debts and compliance with legal obligations and our Company's policies, as well as file and debt information regarding enforcement proceedings (information contained in documents such as court and administrative authority decisions).

#### Location Data:

Information about place of residence, home address, city, country.

#### Audio/Visual Data:

Photographs and camera recordings (except for recordings falling within the scope of Physical Space Security Information), audio recordings (e.g. telephone conversation audio recording)

#### Personnel Data:

Information such as the education level of real persons who have a relationship with our company

#### Other Data:

Information such as document number, account type, member code, access date, PTT barcode number, CRM status, delivery date, statement transmission method, risk degree. Your personal data is collected through all kinds of information documents and documents that you have submitted to our Company both before and after the establishment of the contractual relationship and obtained from third parties and public institutions and organizations for the reasons stipulated by law.

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### 3. Purposes of Processing Personal Data and Legal Reasons

Your Personal Data may be processed by our Company for but not limited to the purposes stated below.

Your Personal Data, the Capital Markets Law, the Turkish Commercial Code, the Enforcement and Bankruptcy Law, the Tax Procedure Law, the Income Tax Law, the Corporate Tax Law, the Law of Obligations, the Law on Prevention of Laundering Proceeds of Crime, the Attorneyship Law and the above-mentioned legislation, including but not limited to legal obligations and It is processed in order to fulfill the requirements of the employment contract.

Legal obligations in accordance with the Capital Markets Law, the Turkish Commercial Code, the Enforcement and Bankruptcy Law, the Tax Procedure Law, the Income Tax Law, the Corporate Tax Law, the Law of Obligations, the Law on Prevention of Laundering Proceeds of Crime, the Attorneyship Law and the relevant legislation, laws, regulations and communiqués in force. In order to fulfill it, in particular;

- Opening an account with the Central Registry Agency,
- Opening an account at Takasbank,
- Sending account statements,
- Defining and updating accounts with our company,
- Carrying out the objectionable customer process,
- Execution of dispute, internal audit and inquiry processes grinding,
- Managing customer complaint processes,
- Execution of internal control processes,
- Conducting investigation processes,
- Preparing and reporting suspicious/erroneous transaction reports,
- Managing defenses before the Capital Markets Board,
- Carrying out risk monitoring processes,
- Execution of information security processes,
- Following up legal processes and carrying out transactions,
- Making and tracking tax notifications,
- Creating clear status reports for customers,
- Making annual residence notification to the Ministry of Finance,
- Conducting the MASAK declaration process.

For the purpose of establishing and executing the contract, in particular;

- Recording customer information into the system and performing account opening/closing procedures,
- Carrying out customer guarantee completion processes,
- Carrying out withdrawal transactions,
- Creating the Customer Stop Out report,
- Carrying out treasury processes within the scope of customer transactions,
- Carrying out discharge and reconciliation processes,
- Storing customer support records,
- Archiving,
- Reporting of contracts,
- Keeping the customer transaction book,
- Providing address confirmation,
- Updating customer contact information
- Carrying out power of attorney transactions,
- Fulfillment of transfer instructions,
- Execution of VIOP account money transactions,
- Keeping the statement submission report.

In order for our company to fulfill its legal obligations, in particular; • Preparation and notification of the Turkish Capital Markets Association information form,

- Keeping internal company minutes.

In order to establish, exercise and protect a right, especially;

- Conducting litigation and enforcement processes.

In order to protect the legitimate interests of our company, in particular;

- Conducting blacklist processes.

Your personal data will be retained for a reasonable period of time specified in the relevant legislation or until the purpose of processing ceases, and in any case, for the legal statute of limitations.

#### 4. Transfer of Personal Data to Third Parties

##### 4.1. Transfer of Personal Data to Third Parties Domestic;

In order to fulfill legal obligations and contractual requirements, including but not limited to the Capital Markets Law, Lawyers' Law, Law on Prevention of Laundering of Crime Proceeds, Income Tax Law, Corporate Tax Law, Stamp Duty Law, Tax Procedure Law and the above-mentioned legislation; It can be transferred to the Capital Markets Board, MASAK, Takasbank, tax offices, Revenue Administration, courts and our Company's relevant suppliers and business partners.

In order to fulfill legal obligations in accordance with the Capital Markets Law, the Law on Lawyers, the Law on Prevention of Laundering of Crime Proceeds, the Income Tax Law, the Corporate Tax Law, the Stamp Tax Law, Tax Procedure and the relevant legislation, laws, regulations and communiqués in force, especially;

- Transmission of investigation reports,
- Carrying out legal processes,
- Forwarding the defense minutes,
- Reporting suspicious/erroneous transactions,
- Making tax declarations,
- It can be transferred to the Capital Markets Board, courts, MASAK, tax offices, Revenue Administration and relevant institutions for the purpose of annual residence notification.

In order for our company to fulfill its legal obligations, in particular;

- Submitting the Turkish Capital Markets Association information form,
- It can be transferred to the Turkish Capital Markets Association and the Capital Markets Board for the purpose of reporting internal company minutes.

#### 5. Ensuring the Security and Confidentiality of Personal Data

In accordance with Article 12 of the Personal Data Protection Law, our company takes the necessary technical and administrative measures to prevent unlawful processing of the personal data it processes and unlawful access to personal data, and to ensure the appropriate level of security to ensure the preservation of personal data.

Technical Measures Taken to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access to Personal Data

KLASFX has taken the necessary technical and technological security measures to protect your personal data and has protected your personal data against possible risks.

#### 5.1. Administrative Measures Taken to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access to Personal Data

- Training and raising awareness of company employees regarding the KVK Law,
- In cases where personal data is transferred, ensuring that a record is added to the contracts concluded with the persons to whom the personal data is transferred, stating that the party to which the personal data is transferred will ensure data security,
- Determining what needs to be fulfilled in order to comply with the KVK Law and preparing internal policies for their implementation,

5.2. Measures to be taken in case of disclosure of personal data through illegal means  
Processed personal data may be disclosed to others through illegal means. If it is obtained by us, our Company will notify the relevant data owner and the Board as soon as possible.

#### 6. Deletion, Destruction and Anonymization of Personal Data

Pursuant to Article 7 of the KVK Law, although personal data has been processed in accordance with the relevant legislation, if the reasons requiring processing are eliminated, personal data is deleted, destroyed or anonymized by our Company ex officio or upon the request of the personal data owner.

The procedures and principles regarding this matter will be fulfilled in accordance with the KVK Law and the secondary legislation that will be established based on this Law.

#### 6.1. Deletion and Destruction Techniques of Personal Data

When necessary, physical destruction and secure deletion techniques from the software are used.

#### 6.2. Techniques for Anonymization of Personal Data

Access restrictions, authorization limitations and necessary controls are provided for access and storage of personal data.

#### 7. Rights of the Customer

In accordance with Article 11 of the KVK Law, you can contact our Company and make requests regarding the following issues regarding your personal data:

- a. Learning whether personal data is being processed or not,
- b. Requesting information if personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- D. Learning about third parties to whom personal data is transferred domestically or abroad,
- to. Requesting correction of personal data in case of incomplete or incorrect processing and requesting that the action taken in this context be notified to third parties to whom personal data has been transferred,

f. Requesting the deletion, destruction or anonymization of personal data in case the reasons requiring the processing of personal data disappear, and requesting that the action taken in this context be notified to third parties to whom personal data has been transferred,

g. Object to the emergence of a result that is unfavorable to the data owner by analyzing the processed personal data exclusively through automatic systems,

h. Request compensation for damages in case of damage due to unlawful processing of personal data. Our company will fulfill your requests arising from the KVK Law through the "Personal Data Owner Application Form". In accordance with Article 13 of the KVK Law, our company will finalize your application requests free of charge, depending on the nature of the request and within 30 (thirty) days at the latest. If the request is rejected, you will be notified of the reason(s) for rejection in writing or electronically. This Information Text may be revised by our Company when deemed necessary. In cases where there is a revision, you will be informed regarding this issue.