

PRIVACY POLICY

The principles followed by 49 GROUP HOLDING ANONİM ŞİRKETİ ("49 Group Holding") while collecting and using the personal data obtained through the website ("Website") depending on the request of the users ("User(s)") are regulated in this Privacy Policy.

Collectable Personal Data

49 Group Holding, on the Website, depending on the User's access to the Website and the transactions made by the Users;

- Identity Information
- Transaction Security Knowledge
- IP Information
- Legal Transaction and Compliance Information
- Contact Information
- Claim/Complaint Management Information
- User Information
- Incident Management Information
- User Transaction Information

It may collect other information that may be necessary for the performance of the services subject to the Website and which is considered personal data in accordance with the Law on the Protection of Personal Data and all relevant legislation. The User expressly consents to the processing of the data that he/she may share with 49 Group Holding in accordance with his/her own will, within the scope specified in this Privacy Policy, for the purposes specified.

Pursuant to Articles 3 and 7 of the Law on the Protection of Personal Data, data that are irreversibly anonymized will not be considered as personal data in accordance with the provisions of the aforementioned law and processing activities related to this data will be carried out without being bound by the provisions of this Privacy Policy.

"Cookie" Usage

49 Group Holding automatically collects data such as visited sections and clicked areas during the Users' navigation on the Website. This data obtained by using the technology called "Cookie" is statistical information. The purpose of this technology is to make the content of the sections visited by the Users more accessible to the User from the first visit to the Website. Most of the browsers are designed to accept these "cookies", which are primarily technical communication files, but Users can always change their browser settings so that the technical communication file is not sent or a warning is given when the technical communication file is sent.

49 Group Holding reserves the right to associate Users' behavior on the Website with a "cookie" in the browser for online behavioral advertising and marketing purposes and to define remarketing lists based on metrics such as the number of pages viewed, duration of visit and number of target completions. The User may then be shown targeted advertising content based on their interests on the Website or other sites in the display network.

Intended Use of the Data

49 Group Holding may process the personal data collected in order for the User to benefit from the Website, to register for membership if the User is a member of the Website, to improve the

services offered, to improve the service, to introduce and inform the new services, to provide the User with the necessary information in this context, to contact the User and to fulfill the obligations arising from the nature of the services offered.

Such personal data may be processed within the scope of 49 Group Holding reporting and business development activities, and may also be used for various statistical evaluations, database creation and market research without disclosing the identity of the User. If the User also consents, such information may be processed, stored and transmitted to third parties for direct marketing purposes by 49 Group Holding and its collaborators, and the User may be contacted for the purpose of promoting various applications, products and services, notifying about maintenance and support activities through such information.

49 Group Holding may also process and share personal data with third parties in accordance with Articles 5 and 8 of the Law on the Protection of Personal Data and/or in the presence of exceptions in the relevant legislation without obtaining the User's separate consent. The main ones of these interpretations are stated below:

- Explicitly stipulated in the laws,
- It is necessary for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to physical impossibility or whose consent is not legally valid,
- If the processing of personal data is necessary, provided that it is directly related to the conclusion or performance of any contract between the user and 49 Group Holding,
- It is mandatory for the fulfillment of legal obligations,
- It has been made public by the user himself,
- Data processing is mandatory for the establishment, exercise and protection of a right,
- Provided that it does not harm the fundamental rights and freedoms of the user, data processing is mandatory for the legitimate interests of 49 Group Holding.

Data Sharing

49 Group Holding may transfer the personal data of the Users and the new data obtained by using this personal data to third parties whose services it utilizes for the performance of the services provided to the User within the scope of the Website, limited to the purpose of providing such services. Within this scope, 49 Group Holding may share User data with third parties such as outsourcing service providers, hosting service providers ("hosting" services), law offices, research companies, call centers in order to improve the User experience (including improvement and personalization), to ensure the security of the User, to identify fraudulent or unauthorized users, to investigate operational evaluation, to eliminate errors related to the Website or 49 Group Holding services, and to achieve any of the purposes stated in this Privacy Policy or other privacy texts provided to the User.

The User agrees that the aforementioned third parties may provide the User's personal data on their servers located anywhere in the world, provided that it is limited to the above-mentioned purposes, and that the User consents to this in advance

User's Right of Access to Data and Correction Requests

The user may apply to 49 Group Holding to learn whether or not personal data is being processed about him/her:

- Learn whether personal data is processed,
- Request information if personal data has been processed,
- Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing,
- To request the deletion or destruction of personal data within the framework of the conditions stipulated in the relevant legislation,
- To request notification of the correction, deletion and destruction made in accordance with the relevant legislation to third parties to whom personal data are transferred,
- To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- Requesting the compensation of the damage in case of damage due to unlawful processing of personal data, has rights.

The user shall submit the above-mentioned requests by the methods specified in the Data Owner Application Form. 49 Group Holding may make its reasoned positive/negative response in writing or digitally in accordance with the above-mentioned requests. It is essential that no fee is charged for the necessary transactions regarding the requests. However, if the transactions require a cost, it is possible to charge a fee based on the tariff determined by the Personal Data Protection Board in accordance with Article 13 of the Personal Data Protection Law.

The User undertakes that the information provided to 49 Group Holding by the User, which is subject to this Privacy Policy, is complete, accurate and up-to-date, and that in case of any changes in this information, the User will update it immediately. 49 Group Holding shall not have any liability in case the User fails to provide updated information.

The User accepts and declares that if he/she makes a request that will result in the use of any of his/her personal data by 49 Group Holding, he/she may not be able to fully benefit from the services that 49 Group Holding has undertaken to him/her, and that any liability arising in this context will belong to him/her.

Retention Period of Personal Data

49 Group Holding may retain the personal data provided by the User for the duration of the services provided in order to fulfill the obligations arising from the nature of the services provided.

In addition, 49 Group Holding may retain personal data in the event of any dispute that may arise between 49 Group Holding and the User, limited to the purpose of realizing the necessary defenses within the scope of the dispute and for the statute of limitations determined in accordance with the relevant legislation.

Data Security Measures, Commitments and Responsibility

49 Group Holding ensures that personal data is not processed unlawfully and that personal data is not processed unlawfully under the conditions specified in the relevant legislation or stated in

this Privacy Policy: to take the necessary technical and administrative measures to ensure the appropriate level of security in order to ensure that personal data is not processed unlawfully, personal data is not unlawfully accessed and personal data is protected, and to have the necessary audits carried out undertakes.

In case there are links to other applications on the website, 49 Group Holding does not bear any responsibility for the privacy policies and contents of the applications.

49 Group Holding does not accept any responsibility for any damages that may occur as a result of the use of personal data within the framework of the above conditions.

Changes in Privacy Policy

Those who make use of the services offered on the Website are deemed to have read and accepted all these terms. 49 Group Holding reserves the right to change the provisions of the Privacy Policy without prior notice. The updated Privacy Policy becomes effective on the date it is made available to the User by any means.