

## LYDIANS ELEKTRONİK PARA VE ÖDEME HİZMETLERİ A.Ş. USER CLARIFICATION TEXT

In accordance with the Personal Data Protection Act No. 6698 ("Act"), your personal data may be processed by Lydians Elektronik Para ve Ödeme Hizmetleri A.Ş. ("Lydians") as the data controller to the extent described below.

### **a. Which Personal Data are Processed**

Unless expressly stated otherwise, for the purposes of the terms and conditions contained in this Clarification Text, the term "**Personal Data**" means the following information.

Lydians processes the data related to the identity information, contact information, user information, transaction information, guide information, visual/audio data, transaction security information, risk management information and location information of real persons ("**User**") who benefit from the payment and electronic money services provided by Lydians as a member of the Fups application ("**Application**") to the extent permitted by the legislation.

Pursuant to Articles 3 and 7 of the Act, the irrevocably anonymized data shall not be considered personal data within the meaning of the Act, and the processing of such data shall be carried out without being bound by the provisions of this Clarification Text.

### **b) Purposes of Processing Personal Data**

Your collected personal data may be processed for purposes ("Purposes") as shown below within the personal data processing conditions specified in Articles 5 and 6 of the Law;

- For the User to benefit from the services offered by Lydians,
- Updating User information,
- Carrying out the necessary work by the business units so that the people concerned can benefit from the products and services offered by Lydians,
- Establishing and implementation of commercial and business strategies of Lydians,
- Fulfilling the procedures resulting from the nature of the activities required to improve the services provided by the Lydians,
- Planning and execution of the necessary activities in order for the User to benefit from the Application more effectively,
- Planning of business partners' and/or suppliers' access to information and management of relationships with business partners and/or suppliers,
- Meeting the requirements of official institutions,
- Informing the competent authorities of the legislation,
- Ensuring compliance with the retention obligations stipulated in the legislation,
- Responding to the applications of the relevant person in accordance with the legislation and carrying out the necessary procedures,
- Pursuit and execution of legal affairs,
- Execution of information security processes,

- Storage of personal data for the duration of the general limitation period to serve as evidence in possible future disputes,
- Receiving, evaluating and finalizing your requests and complaints,
- Improving the services offered by Lydians in the context of planning and/or carrying out processes to create and/or increase loyalty to the services offered by Lydians, introducing new services and providing the User with the necessary information in this direction,
- Carrying out data analytics and other studies and conducting personalized marketing activities in order to plan and execute Lydians marketing and advertising processes,
- Planning and execution of loyalty program processes and carrying out activities for User campaigns,
- Planning and execution of member satisfaction activities and carrying out activities to improve the User experience,
- Execution of the necessary activities to improve the user experience (development of communication management processes, conducting satisfaction surveys),
- Having our relevant business departments carry out the work required for the achievement of the commercial activities run by the Company and conducting the associated business processes,
- Operation and control of the organizational structure necessary for the services provided by Lydians to be provided in accordance with the relevant legislation,
- Sending commercial electronic messages such as advertisements, promotions, etc. of your preferred contact information.

### **c) to Whom and for Which Purposes the Processed Personal Data May be Transferred**

Your collected Personal Data may be transferred to group companies, business partners, suppliers, and legally authorized public institutions and private individuals within the scope of the achievement of the Purposes by Lydians within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Act.

### **d) the Method and Legal Basis of Collection of Personal Data**

Your personal data is collected electronically through the Application, during the membership and/or the use of the Application, on the basis of the conditions for the processing of personal data set forth in Articles 5 and 6 of the Law, in accordance with the Purposes stated above. Your personal data is processed for the following legal reasons in accordance with Articles 5 and 6 of the Law.

Based on the legal reason that the data processing is mandatory for the legitimate interests of the Company;

- Carrying out the necessary work by the business units so that the people concerned can benefit from the products and services offered by Lydians,
- Establishing and implementation of commercial and business strategies of Lydians,

- Fulfilling the procedures resulting from the nature of the activities required to improve the services provided by the Lydians,
- Execution of the necessary activities to improve the user experience (development of communication management processes, conducting satisfaction surveys),
- Planning and execution of the necessary activities in order for the User to benefit from the Application more effectively,
- Planning of business partners' and/or suppliers' access to information and management of relationships with business partners and/or suppliers,
- Improving the services offered by Lydians in the context of planning and/or carrying out processes to create and/or increase loyalty to the services offered by Lydians, introducing new services and providing the User with the necessary information in this direction,
- Planning and execution of member satisfaction activities and carrying out activities to improve the User experience,
- Having our relevant business departments carry out the work required for the achievement of the commercial activities run by the Company and conducting the associated business processes,
- Operation and control of the organizational structure necessary for the services provided by Lydians to be provided in accordance with the relevant legislation,
- Pursuit and execution of legal affairs,
- Execution of information security processes.

Provided that it is directly related to the establishment or performance of a contract, the processing of the personal data of the contracting parties is necessary for legal reasons;

- The User being able to benefit from the services offered by Lydians,
- Based on the legal reason that the data processing is necessary for the updating of user information.

the establishment, exercise or protection of a right;

- Receiving, evaluating and finalizing your requests and complaints,
- Storage of personal data for the duration of the general limitation period to serve as evidence in possible future disputes.

Based on the fact that it is clearly stipulated in the laws, and for legal reasons related to the legal obligation of the Company;

- Meeting the requirements of official institutions,
- Informing the competent authorities of the legislation,
- Ensuring compliance with the retention obligations stipulated in the legislation, responding to the applications of the Relevant person in accordance with the legislation and performing the necessary procedures,

Or, based on your explicit consent, your personal data may be processed to the following extent;

- Performing data analysis and other studies and conducting personalized marketing activities to plan and execute Lydians marketing and promotional processes of your identity, communication, customer transaction and marketing data,
- Planning and executing the Loyalty program processes of your identity, communication, customer transaction and marketing data, and carrying out activities for User campaigns,
- Sending commercial electronic messages like adverts, promotions, etc to your preferred contact information of your identification and communication data.

**e. Rights of the Relevant Person listed in Article 11 of the Act**

We hereby declare that you have the following rights as the relevant person under Article 11 of the Act:

- Learning whether your personal data is processed or not,
- Requesting information regarding your personal data if they are processed,
- Learning the purpose of your data processing and whether this data is used for intended purposes,
- Knowing the third parties to whom your personal data are transferred in country or abroad,
- Requesting correction of personal data if it is incomplete or improperly processed, and requesting that third parties be notified of the processing carried out in this context, • Requesting the erasure or destruction of personal data when the reasons for their processing no longer exist, although they have been processed in accordance with the Act and other relevant legislation, and requesting the communication of the transaction carried out in this framework to the third parties to whom your personal data have been transferred,
- Objecting to a result against you by analyzing the processed data exclusively through automated systems,
- Requesting the compensation if you suffer damage due to unlawful processing of your personal data.

You can submit your applications for your rights listed above using the application form at [www.fups.com](http://www.fups.com) or by other methods provided by the legislation. Depending on the nature of your request, your request will be processed as soon as possible, but no later than within thirty days, free of charge; however, should the processing incur additional costs, you may be asked to pay a fee according to the tariff to be established by the Personal Data Protection Board.