HAYHAY ELECTRONIC MONEY AND PAYMENT SERVICES INC.
INFORMATION NOTICE REGARDING THE PROCESSING OF CUSTOMER PERSONAL DATA

1. DATA CONTROLLER

Hayhay Electronic Money and Payment Services Inc. (“Company”) operates within the scope of Law No. 6493 regarding the issuance of electronic money and payment services. Under Law No. 6698 on the Protection of Personal Data, the Company is the data controller.

Hayhay Electronic Money and Payment Services Inc. (“Company”) operates within the scope of electronic money issuance and payment services under Law No. 6493. In accordance with the Personal Data Protection Law No. 6698 (“KVKK”), your personal data is processed by our Company as the data controller.

Address: Kızılırmak Mah. Ufuk University St. No:13/B/3 Çankaya/Ankara

Email: support@olatl.com

2. RELEVANT PERSON GROUPS

This Information Notice applies to (i) customers, (ii) potential customers/prospective customers, and (iii) website/mobile application users.

3. PERSONAL DATA CATEGORIES, PURPOSES AND LEGAL GROUNDS

For each data category listed below, the legal grounds have been determined in accordance with the practices of the Personal Data Protection Board, matching them one-to-one with the purpose of data processing, without being alternatives to each other.

A. IDENTITY AND CONTACT DATA

Processed Data:

First name, surname, mother's and father's names, date and place of birth, Turkish ID number, identity card serial number, other information contained in identity documents, signature, address, email address, contact address, KEP address, mobile phone number, occupation information.

Processing Purposes and Legal Grounds:

Identity verification and fulfilment of obligations arising from legislation → KVKK Article 5/2(ç)

Execution of pre-contractual and contractual processes → KVKK Article 5/2 (c)

Conducting communication activities with the customer → KVKK m.5/2(c)

Collection Methods:

Electronic and physical application forms, contracts, call centre, third-party identity verification systems

B. FINANCIAL, RISK AND TRANSACTION DATA

Processed Data:

Electronic money balance, payment/transfer records, account summary, transaction history, bank account/IBAN information, payment and collection information, invoice and order information, monthly transaction volume and number, commercial-technical-administrative risk information, information reflected in lawsuit/enforcement files, notices and warnings.

Processing Purposes and Legal Grounds:

Execution of electronic money and payment transactions and performance of the contract → KVKK Article 5/2(c)

Risk management, collection of receivables and ensuring financial sustainability → KVKK Article 5/2(f)

Conducting legal disputes and establishing, exercising or protecting a right → KVKK m.5/2(ç)

Fulfilling obligations arising from legislation → KVKK m.5/2(ç)

Collection Methods:

Application and contract documents, official institution correspondence, credit checks, call centre records.

C. PROCESSING SECURITY AND INFORMATION SYSTEM DATA

Processed Data:

IP address, access and transaction logs, connection time and duration, username, password/password hash information, traffic data, device IMEI and MAC address.

Processing Purposes and Legal Grounds:

Ensuring information systems security and preventing unauthorised access → KVKK Article 5/2(c)

Conducting audit, record-keeping and internal control activities → KVKK Article 5/2(f)

Collection Methods:

Information systems, electronic devices, mobile phones, telecommunications infrastructure.

D. REMOTE IDENTITY VERIFICATION AND SPECIAL CATEGORIES OF PERSONAL DATA

Processed Data:

Voice recordings, video recordings, facial images, facial recognition data, liveness detection data, video call recordings, call centre voice recordings obtained within the scope of remote identity verification.

Processing Purposes and Legal Grounds:

Conducting remote identity verification and identity authentication processes → KVKK Article 6/3 (explicit consent) and KVKK Article 5/2(c)

Compliance with legislation within the scope of preventing money laundering and fraud → KVKK Article 5/2 (c)

Collection Methods:

Video call systems, call centre infrastructures, identity verification technologies.

E. MARKETING AND COMMERCIAL COMMUNICATION DATA

Processed Data:

Purchase history, campaign and survey data, cookie records, feedback information.

Processing Purposes and Legal Grounds:

Conducting marketing, promotion and commercial communication activities → KVKK Article 5/1 (explicit consent)

Collection Methods:

Electronic forms, cookies, call centre records.

4. TRANSFER OF PERSONAL DATA

Personal data may be transferred to the following parties in accordance with Articles 8 and 9 of the Personal Data Protection Law (KVKK) for the purposes of fulfilling legal obligations arising from legislation and establishing and executing contractual relationships:

- Authorised public institutions and organisations,
- Banks and other financial institutions,
- Law firms, enforcement offices, and competent judicial authorities,
- Service providers (information technology infrastructure providers, call centres, SMS/email service providers, etc.),
- Group companies (Hayhay Finansman A.Ş., Başkent Doğalgaz Dağıtım GYO A.Ş., T Doğal Gaz Dağıtım A.Ş., SanctionScanner, Trlogic Bilgi Teknoloji A.Ş., Innovance Bilgi Teknolojileri A.Ş.) may be transferred.

5. RETENTION PERIODS

Personal data shall be retained for the periods specified in the relevant legislation and for the 10-year limitation period under the Turkish Code of Obligations; at the end of this period, it shall be deleted, destroyed or anonymised.

6. RIGHTS OF DATA SUBJECTS AND APPLICATION METHODS

Pursuant to Article 11 of the KVKK, data subjects have the following rights:

a) To learn whether their personal data is being processed,

b) To request information regarding the processing of their personal data,

c) To learn the purpose of the processing of personal data and whether they are used in accordance with their purpose,

d) To know the third parties to whom personal data have been transferred within or outside the country,

e) To request the correction of personal data if they have been processed incompletely or incorrectly,

f) Requesting the deletion or destruction of personal data within the framework of Article 7 of the KVKK,

g) Requesting that the third parties to whom the personal data has been transferred be notified of the actions taken,

h) Objecting to the emergence of a result against the person through the analysis of the processed data exclusively by means of automated systems,

i) To request compensation for damages incurred due to the unlawful processing of personal data.

Relevant persons may exercise the above rights by submitting a written request to the Company's address, along with documents proving their identity, via registered electronic mail (KEP) or via the e-mail addresses registered in our system at support@olatl.comRequests will

be processed free of charge within 30 days at the latest, depending on the nature of the request.

7. TRANSFER ABROAD

Your personal data is not transferred abroad.

8. COOKIES AND OTHER SIMILAR TECHNOLOGIES

Detailed information regarding personal data processed through cookies and similar technologies used during visits to the website and/or mobile application can be accessed via the Cookie Policy.

9. EFFECTIVE DATE

This Information Notice shall enter into force on the date of its publication.