HAYHAY ELEKTRONİK PARA VE ÖDEME HİZMETLERİ A.Ş.
SECURITY OF PERSONAL DATA TECHNICAL AND ADMINISTRATIVE MEASURES

1. PURPOSE

The purpose of this document is to outline the technical and administrative measures taken by the Company to prevent the unlawful processing and access of personal data in accordance with Article 12 of the Personal Data Protection Law No. 6698.

2. ADMINISTRATIVE MEASURES

- Personal data processing activities are limited by job descriptions.
- Employees are provided with awareness training on the KVKK.
- Confidentiality and data security obligations are included in employee contracts.
- Contracts containing confidentiality and data security provisions are signed with third parties from whom services are obtained.
- Personal data storage and destruction processes are linked to written policies.

3. TECHNICAL MEASURES

- Authorisation and access control mechanisms are implemented.
- User-based access authorisations are carried out.
- System accesses are logged and monitored.
- Strong password policies are implemented.
- Security measures are taken for data stored in physical and digital environments.
- Backup and data integrity checks are performed.

4. REVIEW AND UPDATE

The technical and administrative measures taken shall be reviewed periodically and updated as necessary.

5. ENTRY INTO FORCE

This document shall enter into force on the date of its approval.