

LIGHTING TEXT ON THE PROTECTION OF PERSONAL DATA

Paragram Payment Institution Anonim Şirketi (“Payment Institution”) attaches importance to the protection of your personal data. For this reason, with this Clarification Text on the Protection of Personal Data (“Clarification Text”) regulated within the scope of the Personal Data Protection Law No. 6698 (“KVKK”), the representations of the customers (“Customer”) who benefit from the services of the Payment Institution, the personal data they share through the website As the responsible person, it is aimed to provide information about the processing and protection of the Payment Institution in accordance with the KVKK and relevant legislation.

1. PURPOSE OF PROCESSING PERSONAL DATA

Payment Institution is a payment institution authorized to provide services for intermediation of money transfer payments (“Payment Services”) as a payment service within the scope of Law No. 6493. In this context, the processing of your personal data by the Payment Institution is a legal requirement within the scope of the relevant legislation, including the Regulation on the Prevention of Laundering Proceeds of Crime and the Financing of Terrorism, which regulates the obligations of the Payment Institution. As a matter of fact, your personal data will be processed by the Payment Institution without your explicit consent, in accordance with the following purposes, provided that the conditions stipulated in Articles 5 and 6 of the KVKK are met:

- Providing the Payment Services to the Customer duly and effectively;
- Fulfillment of the obligations in the contracts concluded with the Representative;
- Providing general information about Payment Services to the Customer;
- Answering the customer's complaints/questions regarding Payment Services and meeting their demands;
- Ensuring the security of transactions carried out by the Representative, detecting and/or preventing abuse, money laundering or other criminal activities, and in this context, verifying the identity of the Client;
- Realization of international money transfer services representing the joint service of the Payment Institution and the representative;
- Verifying and/or updating data to ensure the continuity and security of Payment Services; And
- Follow-up of legal processes and establishment of rights or obligations arising from legislation.

In addition to the above, if the Customer gives commercial electronic message permission within the scope of the Regulation on Commercial Communication and Commercial Electronic Messages, (i) advertising, promotion and announcement of products and services, (ii) promotions, surveys and personalized product/service offers , (iii) direct or indirect marketing activities of the Payment Institution, including profiling and analysis, and (iv) reporting activities will be carried out in order to target the needs of the Customer.

In line with the above-mentioned purposes, your personal data is processed in accordance with the law and honesty rules, accurately and up-to-date, for specific, clear and legitimate purposes and in connection with these purposes, in a limited and measured manner, in accordance with Article 4 of the KVKK.

The Payment Institution has an obligation to keep the records and documents regarding the transactions it carries out with the Customers for a certain period of time, within the framework of the legislation to which it is subject. In this context, the Payment Institution retains your personal data for the period required for the purpose for which they are processed and stipulated in the KVKK and the legislation on payment institutions.

1. PARTIES THAT PERSONAL DATA MAY BE TRANSFERRED

Payment Institution, Customer's personal data within the framework of Articles 8 and 9 of the KVKK; parties, business partners, officials, employees, auditors, lawyers, consultants, third parties from whom it receives complementary or extension services, banks and Exchange companies with which it cooperates in the realization of foreign money transfer transactions, Financial Crimes Investigation Board and the Republic of Turkey Regulatory and supervisory authorities such as the Central Bank, ministries, authorized public institutions and organizations such as judicial authorities and institutions and organizations stipulated in the legislation to which payment institutions are subject.

The Customer's personal data will not be shared or transferred to third parties without your explicit consent, within the scope of the above-mentioned legal obligations and other than official institutions/organizations.

2. METHOD AND LEGAL REASON FOR COLLECTING PERSONAL DATA

Personal data submitted by the Customer through the website of the Payment Institution, representations within the scope of Payment Services; by automated means

Except for the personal data collected, it is collected by non-automatic means (verbal communication, telephone, e-mail, written, etc.) It can be processed without the express consent of the Payment Institution based on the legal reasons given. The legal reasons for the processing of the Customer's personal data by the Payment Institution are as follows;

- It is clearly stipulated in the laws,
- Data processing is mandatory for the Payment Institution to fulfill its legal obligations,
- In case of actual impossibility, the Customer is unable to express his consent or the data processing is mandatory for the protection of the life or physical integrity of the person or another person whose consent is not legally valid,
- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, to be able to offer the requested products and services or to fulfill the requirements of the contracts you have concluded,
- The Customer's personal data has been made public,
- Data processing is mandatory for the establishment, exercise or protection of a right,

3. RIGHTS OF THE PERSONAL DATA OWNER STATED IN ARTICLE 11 OF KVKK

Pursuant to Article 11 of the KVKK, the Customer has the following rights:

- Learning whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- To learn the purpose of processing personal data and whether they are used in accordance with the purpose,
- Knowing the third parties to whom personal data is transferred in the country or abroad,
- Requesting the deletion or destruction of personal data in the event that the reasons requiring it to be processed disappear despite the fact that it is processed in accordance with the Law and other legal provisions, and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,

You can submit your requests in line with your listed rights, with the methods specified in the legislation, and the Paragram Payment Institution's Dumlupınar Mahallesi 576 Sokak No:30 ÇANKAYA/ ANKARA.

address, or send it via a notary public, or send it to the Paragram Payment Institution's system. info@pgpara.com You can send it to your e-mail address. The customer's requests will be evaluated and concluded free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires a separate cost, it is possible for the Payment Institution to charge the Customer a fee based on the tariff determined in Article 7 of the Communiqué on Application Procedures and Principles to the Data Controller.

In the event that the Customers want their personal data to be deleted, destroyed or anonymized, these requests can be fulfilled at the end of the period determined by the legal regulations, and during this period, the personal data of the Customers will not be processed and shared with third parties, except for the obligations arising from national and international laws, regulations and contracts.