

PRIVACY POLICY

In this Privacy Policy, we have provided data collected and used when you use **Finrend Teknoloji Anonim Şirketi** (hereinafter referred to as “*Finrend*” or “*We*”) services or otherwise interact with Finrend and its websites, mobile application, services or use the functionalities on this website. This Policy has been prepared to explain how and what type of personal data will be collected, processed and used during your visits to the Finrend website and interact with Finrend, why its collected with whom its shared and your rights regarding European Union General Data Protection Regulation (hereinafter referred to as “GDPR”).

Finrend deals with the personal data of its users by respecting their privacy. Finrend process your personal data with due care, in a fair, lawful and transparent way. Our aim is to create and maintain the basis for a trusting business relationship with our customers and prospects. The confidentiality and integrity of your personal data is top priority for us.

The terms of this privacy policy are subjected to any additional terms or other contractual terms you have entered into with Finrend such as terms of use or cookie policy and any applicable mandatory laws and regulations.

1. CONTROLLER

We, Finrend Teknoloji Anonim Şirketi (Mehmet Akif Mah. Hicret Sok. Merit Life Sitesi B Blok No:2B İç Kapı No: 30 Ümraniye/İstanbul), are the responsible for and is the Data controller of your personal information it receives though Finrend website and during services.

If you have any further questions regarding data protection in connection with our website or the services offered, please contact our data protection officer via kvk@finrend.com email address.

2. COLLECTED DATA

Personal data we collect depends on how you use our website, related functionalities, which information you provide to us and interact with us.

Finrend collects the following data from its Users:

- Data collected during registration to Finrend services; first name, last name, e-mail address, mobile telephone number, social media user name, account password.
- Data collected during the visiting website; cookie data, data from device preferences, browser type, account password.
- Data collected during the payment; (payment data); first name, last name, credit/debit card type, expiration date, card number, CVC Code, transaction history.
- During the process to be to use services of Finrend; Online identifiers such as IP addresses, and / or the blockchain transactions made by the user of the services of Finrend, which can be associated to the natural person by their wallet / public key / account on the blockchain.

** If you give information on behalf of someone else you must ensure that you have their permission and that they have been provided with this Privacy Policy before doing so. If you are under 16 please do not provide us with any of your information unless you have the permission of your parent or guardian.*

**If you supply services to Finrend, most parts of this Policy will not be relevant to you; we will only collect and use your business contact information for the purposes of our company and we will retain such information for as long as this is necessary for our legitimate business purposes.*

3. COLLECTING PERSONAL DATA

The User provides information such as name, last name, e-mail address, home or mobile phone numbers during the membership registration, get in touch with us page through the website.

In addition, the User shares with us the digital wallet information in order to benefit from the services offered by Finrend. Also, We process personal information to prevent and detect fraud and abuse in order to protect the security of our users, Finrend Services and others.

Apart from these, information such as browser and login information, account password collected via cookies, are automatically obtained.

4. USE OF COLLECTED DATA

Finrend uses the personal data of its users for the following purposes:

- To interact with you, respond to your message, provide you with the subscribed service,

- To present, personalise and improve Finrend services,
- To inform you about current Finrend campaigns, customer support and marketing,
- To fulfil and follow up the User's transactions for prevention fraud and risks,
- To analyse customer survey responses,
- To participate in the interactive aspects of website,
- To contact with the you to develop business relations,
- For financial, audit and tax reporting,
- To promote services by analysing the User experiences,
- To provide advertisement and service according to the results by determining the needs according to the region or countries where the User is located,
- To provide network security,
- To collect the necessary payment for you to use Finrend services,
- To detect the acts contrary to the User Agreement and Privacy Policy,
- To identify, prevent, investigate the acts against laws,
- Responding to your requests to exercise your rights under data protection law.

5. LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA

Where you have consented to processing your data you will have been presented with a consent form in relation to any such use and may withdraw your consent at any time

1. by sending an email to kvk@finrend.com
2. or by writing to us at: Mehmet Akif Mah. Hicret Sok. Merit Life Sitesi B Blok No:2B İç Kapı No: 30 Ümraniye/İstanbul.

- Where necessary to performance of a contract with you
- Where necessary to compliance with a legal obligation
- Where is necessary in order to protect the vital interests of you or another natural person
- Where is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested to us
- Where we use it to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights

There may be uses that are permitted on the basis of other grounds; where this is the case we will use reasonable endeavours to identify the ground and communicate it you as soon as possible after becoming aware of the new basis.

6. THIRD PARTIES TO WHOM WE MAY TRANSFER YOUR DATA

Personal information which we collect may be transferred to or accessed by third parties on our behalf, with your consent where necessary. Your personal data will only be processed by persons who are authorised to know the data concerning their duties. These persons are informed by Finrend about the confidentiality obligations set out in the Finrend Privacy Policy.

The data of you are not shared without consent, except for compliance with the law in force, protection of the rights of Finrend, prevention of fraud, implementation of a judicial, administrative decision. Finrend declare, agrees and undertakes not to sell, rent or entrust the personal data of the User to third parties without their consent. In addition, the payment information of the User can be shared with the payment service providers on behalf of the collection of the payment required to use the Finrend services. Personal data of user can be shared with IT providers to provide us systems and services for customer support. Personal data of user can be shared abroad within the framework of the cloud systems that we provide services for archive service to be located abroad, and the e-mail contact addresses sent to the relevant persons to be kept in data centers abroad.

This is only shared in a secure manner, using a consistent security protocol. When we share with other parties we ensure that they only use your personal data for the purpose it was collected and do not allow them to abuse this agreement.

Finrend will be able to share your personal data with third parties under the following circumstances:

- **Service providers and business partners:** We will allow our employees, service providers and business partners that perform amongst others, processing of secure payments, web maintenance and other IT services, marketing and communication, accounting, finance, legal and audit and other business operations needed for Finrend to provide the services requested by the natural person;
- **Law enforcement agency, court, regulator, government authority or other third party with compelling authority:** We will be able to share your personal data with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party;

- **Third parties:** We will share your personal data with third parties for the fulfillment of the relationship you have with us, only when it is strictly necessary, and a Data Processing Addendum has been signed with such third party;
- **Other third parties:** We will share your personal data with other third parties only when consent has been provided.

7. RETENTION

We erase your personal data if the retention of that personal data is no longer necessary. This depends on the purposes for which they were collected.

In case you contact us, we will keep the information you provided until no longer required.

Subscription – In case you subscribe to the news feeds we keep your personal data until you unsubscribe from these services.

**Please note that Finrend has the right and sometimes is even obligated to retain certain information for a longer period of time. This period always complies with the legally permissible duration.*

8. SECURITY

Finrend hereby declares and undertakes that it will take the necessary decent measures to protect the personal data of its Users from any breach by unauthorised third parties or a public disclosure. In this context, access to Users' personal data is limited to Finrend employees who only need to see this information and comply with the Privacy Policy. However, Finrend is not responsible for any unforeseen breaches that may be encountered in spite of the fact that these security measures have been taken with due diligence and care.

The User is responsible for account and password security. In this context, the User must determine a secure password and should not share this password with third parties. In public or shared devices, the User must not use this feature or make sure that he/she are logged out from his/her account and video platform. Finrend cannot be held liable if the User does not pay attention to his/her account security.

Obtaining information on the payment of the service fee of the Users is carried out within the framework of generally accepted security methods. For this purpose, secure databases and servers, security software, encryption software are used.

9. YOUR PERSONAL DATA RIGHTS

We would like to give you an overview over what personal data rights you have:

- Right to access your personal data held about you and to learn the origin of the data, the purposes and means of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed,
- Right to restrict the processing of your personal data in certain circumstances, e.g. where you have contested the accuracy of your personal data, for the period enabling us to verify its accuracy,
- Right to erasure (“right to be forgotten”),
- Right to restriction of processing,
- Right to data portability,

10. COOKIES

10.1. What Are Cookies?

Cookies are small text files, usually composed of letters and numbers, that are stored by the website you visit on your device or network server through browsers. Cookies are saved for purposes such as providing personalized user experience, developing a website, and serving more relevant advertisements through browsers when a website is visited.

Finrend can also use web beacons with cookies in accordance with the intended use of cookies. Finrend also uses other similar technologies, such as browser storage and plug-ins such as HTML5, IndexedDB, WebSQL.

Finrend collects data on the use of website and/or mobile application to provide better service to its users through cookies.

Finrend also reserves the right to change cookie policy without notice.

10.2. How Do We Use Cookies?

We use the data we collect from users visiting our website through cookies for the following purposes:

- To improve the services offered to you by increasing the functionality of the website, improving the existing website and offering new features on the site and personalizing the offered features according to your preferences,
- To ensure the legal and commercial security of the website, you and our Company,
- Integration and analysis of different servers on the Internet, increasing the performance on the website, determining the number of visitors to the web site and making performance adjustments accordingly or making it easier for them to find what they are looking for,

- Posting on third-party social media over the Site, remembering the username data or search queries of the visitors of the Sites on their subsequent visits, to increase functionality and ease of use,
- Displaying advertisements related to the interests of the visitors through the pages which visitors have previously viewed by performing personalization, targeting and advertising activities.

10.3. What Types of Cookies Do We Use?

Finrend uses two types of cookies, permanent and session cookies. Permanent cookies help users to be recognised only as the Users and do not allow identification of personal identity. Session cookies are only active during the session when logged in via the Finrend website and/or mobile application. The saved data may be the pages the Users have visited, the date and time of the visit, or other tracking information. Cookies can be used for authentication, security, preferences, advertising, performance analysis and research.

- **Strictly Necessary Cookies**

These cookies are essential for the website to function properly. These cookies allow the Website to be visited and its features to be used properly and safely. Session cookies are used to ensure information exchange between the various pages of the website and to prevent the users from entering the information more than once. The cookies in this category do not collect personal data in any way, they're temporary and deleted right after the browser is closed. These types of cookies are necessary for site performance and are not subject to the consent of our visitors.

- **Performance and Analysis Cookies**

We improve the services we offer to our customers by applying performance analysis in the use of our site. Performance and analysis cookies are used to determine the pages our visitors view the most on our site, and whether our site is functioning properly. This information may be used to improve the performance of the website.

- **Functionality Cookies**

By reminding the preferences and choices made by our visitors on our site, the services on the site are personalized. Remembering the font size and language options of the texts used on the site is provided by functionality cookies.

- **Advertising Cookies**

Advertising cookies are used to promote services on our site. These cookies are used to deliver adverts more relevant to you and your interests. This includes advertising cookies that are carried out to track the clicks on the advertisements on our pages, and whether the services on the websites directed by the advertisements that interest you are used.

10.4. How to Manage Your Cookies?

By using the Finrend website and/or mobile application, the User is deemed to have accepted the terms related to cookies specified in the Privacy Policy. If the User does not accept the cookie policy, the User has right to personalize their preferences by changing browser settings. It is possible to change preferences on cookies through browser settings, if the User's browser offers this option. Thereby, although it may differ according to the possibilities offered by the browser, data subjects/owners have the opportunity to prevent the use of cookies, to choose to receive a warning before the cookie is used, or to disable or delete only some cookies.

The User can close cookie features via the browser and delete the saved cookies by using browser features or by using third party software. However, due to the cancellation of cookies, there may be disruptions during the use of Finrend services, and Finrend does not accept any responsibility for such problems that may occur.

The preferences on this subject vary according to the browser the User use, and the User can reach the general explanation at <https://www.aboutcookies.org/>

The User's choices regarding cookies may need to be made separately for each device from which the User's access our website.

**In terms of Cookies used by many companies for advertising activities, preferences can be managed through Your Online Choices.*

**The settings menu of the mobile device can be used to manage Cookies on mobile devices.*

11. THIRD PARTY LINKS

Finrend may contain links to the third-party websites on the Finrend website and/or mobile application. Finrend has no right and control over the third-party websites accessed through such links. Therefore, Finrend shall not be held responsible for the privacy or content of these sites. The User must review the privacy policies of these websites for data protection before using these websites or providing their personal data to these websites.

12. CONCURRENCE

By using the website, the User agrees to this Privacy Policy. The User who does not accept the Privacy Policy must not use the Finrend website.

13. CHANGES

We reserve the right to update or change our Privacy Policy at any time. We may update this Privacy Policy from time to time by updating this page. We exhorted you periodically to

check this website to stay update about the information we collect, use, and share. The Privacy Policy shall enter into force on the date of its publication.

14. CONTACT

The User may contact Finrend regarding privacy, questions or complaints regarding this Policy.

To reach by mail : Mehmet Akif Mah. Hicret Sok. Merit Life Sitesi B Blok No:2B İç Kapı No: 30 Ümraniye/İstanbul

E-mail Address : kvk@finrend.com