PRIVACY AND DATA PROTECTION POLICY

TAMBU Application ("Implementation") is a group of companies of Türk Telekomünikasyon A.Ş. ("Türk Telekom"), ARGELA YAZILIM VE BİLİŞİM TEKNOLOJİLERİ SAN. VE TİC. Inc. (Hereinafter referred to as "ARGELA" or "WE").

This Data Protection Policy ("POLICY") describes how your personal information is gathered, used and shared by us with identifiable or identifiable information ("Personal Data"). In the interpretation of the expressions which are not defined in the Pervasive Data Protection Policy, the MANDATORY USER CONTRACT ("User Agreement") shall be taken into consideration.

How Is Your Data Obtained?

In ARGELA, we obtain your personal data either through voluntarily providing it directly to us or through the Application. Your personal data we collect in this way includes information that you have provided during the course of activities such as enrollment, account creation, profiling, filling out forms, making correspondence with us, purchasing products through the application, or responding to surveys or promotions in order to use the Application.

We may also obtain some personal data in indirect ways, such as information about the device you use to connect to the Application, information about how you use the Application, or information about you from third parties such as our service providers.

Which Verbs are gathering?

The following is a detailed description of the personal data categories we can collect within the services we offer:
**Identity and Communication Information:** Phone number, GSM operator, e-mail address and other similar data, membership information, if any, passwords used to authenticate the application and provide account access.

**Uses and Favorites:** You will be able to find out what types of messages (text, video, etc.) are sent to your account from paid and free of charge, which content is included in your devices, including but not limited to data collected from your devices via various software and technological tools. The language of use, the active time intervals, what services are used, the usage habits of the application interface, the date of the last login to the application, and any errors that occurred during application usage.

**Location Data:** Includes data on locations (approximate) of users. Depending on the device settings at your disposal, this includes GPS data, the base station and Wi-Fi hotspots that define the location, and location information and navigation data from IP addresses.

**Device Data:** Device model, operating system of the device, preferred phone usage language, information on which operator the user is using, country information and so on.

Protection of Personal Data and Data Responsibility

Your personal data; Protection of Personal Data ("KVKK") No. 6698, Electronic Communications Law No. 5809, Information Technologies and Communications Authority, Regulations of Personal Data Protection Institutions and other legislations, and in accordance with the relevant legislation, ARGELA prevents the illegal processing of your personal data. All technical and administrative measures to ensure the appropriate level of security with the aim of preventing and maintaining access unlawfully.

**Processing of Personal Data**

Your personal data, within the framework of procedures and principles of aggregation and anonymization; To provide you with better services and technological advances / improvements, to detect and prevent the activities and informing of our company's innovations and all kinds of malicious uses (such as virus attacks and cyber attacks), to analyze and work for product and
business development. To provide information about our customers' requests, fulfillment of your requests, finalizing and informing your complaints, customer satisfaction, researching and measuring the tendencies of consumers, determination of their commitment, awards, raffles, contests, gifts, thanks, celebrations, reminders, brand cooperations, services, products and services Training and development of our employees to provide you with better service, regulatory and supervisory agencies, legal obligations in the legislation on official authorities Fulfillment of obligations and sharing necessary information for audit activities, provision of contracts and financial agreements related to products and services offered with our partners or other third parties, preparation of campaigns and proposals related to our company's products and services, presentation, presentation, Marketing and marketing activities and information, strategies, planning and business development, measurement of service quality, financial reporting and analysis, complaints, complaints, and complaints, including but not limited to the provision of electronic communications services, traffic management, services, products and services, Legal pursuit and similar purposes.

Transfer of Personal Data

Your personal data, within the scope of Laws and other legislation and for the purposes stated; ARGELA and all the group companies of Türk Telekomünikasyon A.Ş. that you are affiliated with are authorized by our companies, representatives, dealers, regulatory and supervisory agencies that are authorized on behalf of and accountability of our group companies, competent authorities who will determine your position as an emergency call, Public institutions or organizations authorized to explicitly demand that the law be subject to the provisions of this Act shall be subject to the obligations of business partnerships, suppliers and contractors, payment and e-money institutions, banks and other real or legal persons, tax and similar advisors, Persons, institutions and organizations and supervisors, including, but not limited to, third parties to whom we have been consulted, domestic or foreign, business partners, service recipients, authorized persons and entities abide will.

Your Rights in the Processing of Personal Data

By applying to our Company in accordance with Article 11 of KVKK;

A) Learn whether your personal data is processed,
B) requesting information about your personal data if it has been processed,

C) To learn how your personal data is processed and whether it is used appropriately for its purpose,

Ç) To know the third parties to whom your personal data are transferred in or out of the country,

D) requesting correction of personal data if it is incomplete or incorrect,

E) requesting that your personal data be deleted or destroyed in accordance with the conditions stipulated in the related article of the law,

F) requesting that transactions carried out in accordance with subparagraphs (d) and (e) be notified to third parties to whom personal data are transmitted,

G) Objection to the appearance of a result against yourself by analyzing your data processed exclusively through automated systems,

Ğ) Claiming that you are harmed due to the processing of your personal data in contravention of the law.

You have rights.

**Personal Data Retention Time**

ARGELA stores personal data for the time required for acquisition and / or secondary processing purposes. The confidentiality of personal data for the periods stipulated in the relevant legislation for disputes that may arise from the User Agreement shall also be considered within this scope.
Our Data Safety Precautions

ARGELA implements an information security program that includes all reasonable administrative, technical and physical control mechanisms to protect your personal data. For example; At least in industry standards, the use of encryption technologies to ensure the safety of your payment transactions through reasonable technical and organizational measures. However, no method of transmission over the internet or electronic storage is completely secure, and ARGELA can not guarantee absolute security in this context.

ARGELA does not share the personal data of users with any third party contrary to this Policy and / or the legislation of protection of current personal data. ARGELA, personal data only for secondary processing activities If the subject matter is in compliance with the law. In the event that the personal data of users are shared with non-corporate service providers in accordance with this Policy, ARGELA will take the necessary measures to ensure that these third parties protect in the same or similar levels.

However, ARGELA is not responsible for third party applications and / or uses linked through the Application.

Changes to the Policy

ARGELA may update and modify these Policy provisions at any time by posting on the Application. The updates and changes ARGELA made in the Policy will be effective from the date of publication in the Application.

You can forward all your inquiries and requests related to your personal data to our company at tambu@turktelekom.com under the Protection of Personal Data Act number 6698 by e-mail.