

Confidentiality Policy

Confidentiality Policy

This Confidentiality Policy ("**Confidentiality Notice**") is describing matters regarding collecting and processing of your personal data, sharing with third parties, protecting and ensuring security of the same by Akron Elektronik Ticaret Ve Bilişim Hizmetleri Anonim Şirketi including any rights you are entitled to in connection with these matters.

Summarized Context

Scope and Consent

This Confidentiality Policy is describing matters regarding collecting and processing of your personal data, sharing, securing and protecting the same by our side, including any rights you are entitled to in connection with these matters. This Confidentiality Notice shall be applicable to any and all kinds of applications and services provided (jointly "**Services**") including mobile devices, whereby it is referred to this Confidentiality Notice, including our Web Site and regardless of your access or usage method. By using our Services and/or generating an account, you are agreeing to this Confidentiality Notice and our User Agreement and, as described under this Confidentiality Notice, you are consenting our collecting/compiling, using your personal data, sharing them with any third parties as and when required, as well as securing and protecting the same.

Confidentiality Standards

We have duly taken all kinds of appropriate security measures to ensure that your personal data are processed exclusively within framework of the objectives set forth under this Confidentiality Notice.

Collecting Personal Data

Once you use our services, create any user account, provide information on such relevant form in order to create a user account, update your account data and particulars or add any information thereto, conduct any communications, chats between users or take part in settlement of disputes or get in contact with us in any other way and manner regarding our Services, we are collecting, processing and maintaining/protecting your personal data.

Usage and Protection of Personal Data

We are using the personal data we are collecting for:

- Introducing and developing our services,
- Presenting on our site a personalized experience (by offering services and products that might be of your particular appreciation),
- Communicating with you in relation with your account or our services,
- Introducing you customized/personalized advertisement and marketing services,
- Or detecting fraudulent or illegal activities, if any,

Avoiding the same and investigating these types of issues.

We are keeping and protecting your personal data so long as prescribed by the relevant legislations or related to our operations or required for our operations.

Further to the aforesaid, we are entitled to keep **any personal data under closed accounts as well**, for

- Complying with the legislations currently in practice,
- Preventing/avoiding fraud,
- Collecting any indebted fees,
- Settlement of disputes,
- Assisting in investigations,
- Implement our User Agreement and be involved with such other operations allowed or required by the legislations in effect.

Sharing of Personal Data

We are entitled to share your personal data with any third party persons and entities.

Sharing of such personal data might be necessary for:

- Presenting our Services and enabling your access to our Services,
- Complying with our legal obligations,
- Implementing our User Agreement,
- Providing for our marketing and advertisement activities,
- Avoiding/preventing any fraudulent or illegal activities in connection with our Services,
- Detecting and minimizing the same and conducting a proper investigation to that effect.

Security

In order to reduce any risks associated with loss of your data, ill-willed usage of the same, unauthorized access to your personal data, unauthorized sharing or altering of your personal data, we are protecting your personal data by means of adopting any appropriate technical and administrative security measures.

Your Rights/Inquiries and Complaints

This Section is describing your rights pursuant to Law Number 6698 About Protection Of Personal Rights. You are welcome to contact us in writing in the event you have any question or complaint concerning this Confidentiality Notice or desire to use your rights pursuant to the legislations currently in effect.

Scope and Consent

This Confidentiality Policy is describing matters regarding collecting and processing of your personal data, sharing, securing and protecting the same by our side, including any rights you are entitled to in connection with these matters. Including those realized over mobile devices and regardless of your method for access and usage; This Confidentiality Notice is valid for

such Web Site www.ahicoins.org belonging to AHICOIN, where it is published and made reference to ("Site") as well as any other linked web sites, all kinds of applications, products and services (together, "Services"). Usage of our Services on the Site or creation of any account on the Site are subject to this Confidentiality Notice you are accepting, Cookies Notice as well as our User Agreement. Accepting and agreeing to the Confidentiality Notice, Cookies Notice and User Agreement by means of continuing to use our Site and Services or creating accounts; are all indications of the consent you are granting in an express manner under your own free-will towards collecting, sharing, securing and protecting your personal data by basing on the acknowledgment we provided you under the Confidentiality Notice, to the extent and as described hereunder and thereunder to enable us providing such Services. As such data asked from you are required and needed to introduce these Services; in the event you refrain from/fail to share the subject matter data and particulars with our side, it might not be possible to present our Services in full and as complete.

Personal Data

"Personal data" mean such data and particulars belonging to any real person with identity already specified or could be specified from such data available to or could be accessed by our side. Personal data do not include any aggregated data and such data made anonymous, as well as any statistical data not belonging to real persons or not belonging to specified or specifiable real persons.

Changes In This Confidentiality Notice

Changes could at all times be made on and to this Confidentiality Notice. These enter into effect instantly as soon as being published on our Site. In case you refuse and do not agree with these changes, you could possibly contact our support team and terminate your membership.

Collecting/Compiling Personal Data

We are collecting, processing and protecting your personal data once you

- Use our Services,
- Create an account,
- Fill any form contained in our Site,
- Update your account particulars or
- Add any data and particulars or purchase or sell any products and/or services and take part in any dispute settlement process
- Or communicate with our side concerning our Services or
- Other users and
- Visit our Site.

Personal data we are collecting comprise mainly of the following: **Such personal data you are providing us once you use our Services or create an account.**

- When you create an account, any identify data and particulars such as your name, Republic of Turkey Identity Number as well as such other data appearing on Republic

of Turkey Identity Cards, your address, telephone number and e-mail address, date of birth, photograph;

- Such customer transaction particulars and contents arising in the course of procedures realized under scope of your activities on the Site, generated by your side or connected to your account;
- Financial data connected to your procedures (such as bank account numbers);
- Further, such other data and particulars provided through such forms contained in the Site, upon updating the data pertaining to your account you created for membership in the Site or adding any further data, taking part in settlement of disputes or when you purchase or sell products and/or services or upon contacting us in any other way and method, including contents of any and all kinds of discussions/communication made with users generated to this effect as well as any records corresponding to the same;
- Such other data and particulars required or allowed to be collected and processed pursuant to the laws in effect for verifying or stipulating your identity;

Personal data collected automatically once you use our services or create any account

- We are also collecting data about issues concerning your using our services and communication with our side as well. These comprise of such data received when you use our Services, create any account, provide information on any form contained in the Site, update your account particulars or get in contact with users or take part in settlement of disputes or received from such devices (including mobile devices) you used when communicating us about our Services in any other way and manner. Such data and particulars comprise of the device identity or unique introducer, device type, advertisement identifier and unique device symbol.
- Geographical position data including such location particulars obtained from your mobile device. We would like to remind you that most of the mobile devices allow and enable to check location services or delete usage of the same via an application available in the device settings menu of such mobile device.
- Such computer and connection data like page viewing statistics, incoming and outgoing traffic to and from the page, directed URL, advertisement data, your IP address, your browsing past and web log data.

Personal data collected by using cookies, web markers and such similar technologies

In order to collect information about the pages viewed, links clicked and such other procedures you carried out in relation with our Services, we are using our advertising and e-mail contents, cookies, web markers (beacons), unique identifiers and such similar technologies. For further detailed information about our using such technologies and how you could keep these under control, kindly review our Policy About Cookies.

Personal data collected from other sources

- You are allowed to present us any personal data belonging to others (such as delivery address pertaining to any other person, data and particulars belonging to the holder of any other card you are using for the relevant transaction) solely in case express

approval and consent of the subject matter persons are taken in advance. You should advise such persons as well pursuant to our Confidentiality Notice regarding how we collect, use, share and keep their own personal data.

Usage and Maintenance/Protection of Personal Data

We are using the collected personal data to introduce and develop our Services, to present a customized/personalized experience on the Site, to communicate with you in relation with your account and our Services, provide you with customer services, assist in realization of your purchasing and sale procedures upon enabling communication by and between the buyer and seller, introduce/offer customized/personalized advertising and marketing services as well as detect, avoid, minimize and investigate any fraudulent or illegal activities. We are entitled to use and keep your personal data as follows:

Introducing, developing and customizing our Services

- Enabling access to our Services and ensuring that our Services are used;
- Privatizing, measuring and developing our Services;
- Presenting such other services that you could possibly demand in the manner described once we collect the relevant data;
- We could use geographical position data for providing location-based services (such as advertising, search/inquiry results and other customized contents).

Contacting you in relation with your account and introducing customer services

- Serving notices in relation with your account, eliminating any problems regarding your account, assessing your complaints and proposals, settling disputes, collecting any fees or charges indebted, communicating with you in order to have an idea about your opinions through inquiries or questionnaires or providing you with customer services as required by other ways and means or confirm the data and particulars of those parties subject matter of the relevant transaction;
- Contacting and communicating with you when deemed necessary for executing our User Agreement or any other agreement we made and entered with you or performance of those obligations arising from the subject matter agreements and/or legislations currently in effect or using of the rights, to this effect issuing any and all records and documents required therefor;
- Enabling that our advertising and marketing communications are customized/personalized and develop and improve the same so that they are of more interest for you;
- Within scope of these purposes, we could possible communicate with you via e-mail, SMS. In case you approve such communication, we shall be using such communication data you have provided us for communicating via e-mail, SMS message. While communicating with you via phone, we could possibly use such methods like automatic dialing or pre-recorded dialing or sending SMS. To this effect, we would like to remind that SMS and such other data transmission fees are applicable.

Detecting, avoiding, minimizing and investigating any fraudulent and illegal activities

- Avoiding, detecting, minimizing and investigating any fraudulent acts, security violations, suspicious transactions, any activities which could potentially prohibited, already prohibited or which are illegal;
- Ensuring that our Confidentiality Notice, User Agreement or such other policies are duly applied and implemented;

We are keeping and protecting your personal data as long as required for our operations and are related to our activities and operations and necessitated by our objective regarding keeping of the same. In addition thereto, we are entitled to keep any personal data corresponding to closed accounts in order to comply with the laws in effect, to avoid/prevent fraud, to collect any fees/charges indebted, to settle any disputes, to eliminate problems, to assist in conducting investigations, to resolve any user complaints, to ensure that our User Agreement is duly implemented and applied as well as to deal with such other operations allowed or required by the laws in effect. We would like to remind further that pursuant to such regulatory practices currently in effect, primarily Law Number 5651 Concerning Regulation Of Publications Made On Internet Media and Combating Crimes Committed Through Such Publications and Law Number 6563 About Regulation Of Electronic Commerce, we are obligated to keep your personal data throughout the terms set forth to that effect. In the event such circumstances requiring your personal data to be kept and protected are removed, we shall either be destroying your personal data in a secure and reliable manner or make them anonymous.

Access

In order to ensure that the personal data we are collecting are/remain accurate and updated/current, your proper access thereto as well as enable you to correct the same as and when required, we are adopting any necessary measures including the following.

- In case your personal data are changed or incorrect, kindly update the same without delay.
- In the event you enter any notice/content open to all, you might not possibly change or delete any such notice. In parallel to your request therefor, we shall be closing the respective account and terminate within a reasonable period of time, imaging your personal data pursuant to your account activities and legislations currently in practice.
- We shall be paying respect to your legal rights concerning access to your personal data, changing or deleting of your personal rights. In order to use your rights regarding your personal data, we are welcome to access us from the section at the Site dedicated to providing support.

Sharing Of Personal Data

You could possibly share your personal data with any third parties such as business partners we are receiving services and/or cooperating with in order to conduct the operations described under this Confidentiality Policy. Such sharing shall be realized following completion of any assessments and analyses regarding security with respect to those third party persons

and entities. Purpose of our aforesaid sharing might be related to and required for having access to our Services, complying with our legal obligations, ensuring that our User Agreement is duly implemented and applied, conducting our marketing and advertising activities or realization of your purchasing and sale operations, or avoiding any fraudulent or illegal activities in connection with our Services, detecting, minimizing or investigating these types of activities. We are disclosing personal data to those parties listed hereinbelow who are directly related and required to perform and fulfill the specified purposes and objectives. As indicated hereinbefore, we are not transferring your personal data to any third parties for marketing and advertising purposes, without obtaining your express consent.

Service providers and financial entity partners

- Your data could possibly be shared with any third party service providers both locally as well as abroad, to obtain their assistance regarding any potential illegal or doubtful transactions, avoiding and preventing violation of our User Agreement, fraud and/or suspicious transaction breaches, detecting, minimizing and investigating the same, membership and prize programs, common branded credit cards, personal advertising presentations, payment transaction services presentation and such other business operations.
- Your personal data could possibly be shared with any third party finance institutions that might present with financial products for providing common contents and services such as registry, transaction and customer support. Subject matter third party financial institution shareholders shall be entitled to use your personal data solely for sending you marketing communications, provided you have requested their services and approved such institutions.

Law enforcement officers, legal transactions, public agencies and legal authorities

- We could possibly share for complying with any legal requirements, executing our User Agreement, intervening with claims to the effect that any content is violating the rights of other persons or in order to protect and preserve rights or security of anyone.
- Data shall also be shared with law enforcement officers or public agencies or duly authorized third parties in response to a verified claim regarding such other activities and operations that could subject us, you or any of our users to legal responsibility in parallel to any criminal interrogation or suspected illegal acts. To the end, we shall be disclosing any data and particulars we deem to be related exclusively to the interrogation or relevant investigation, such as name, city, postage code, telephone number, e-mail address, user's past identity particulars, IP address, complaints regarding fraud, shopping history and listing background.
- We are entitled and allowed to share with any credit institutions duly authorized by the legislations in effect, such data like credit note report or any delayed or failed payments that could be reflected to their files or information about such other data in your account like payments at default.
- In circumstances we deem necessary in order to avoid any intellectual or industrial right violations or bring an end to the same, we could as well share data (such as city,

postage code, telephone number, e-mail address, user identity background, IP address) of the relevant users to the participants (right holders) of such program under scope of Right Holders Protection Program, provided they agree to and accept any necessary commitments and agreements regarding the said program.

- In the event of any court writ/summons, court order or any judgment similar thereto in essence or to avoid any possible physical damage or financial loss or to report any suspected illegal activity, if we consider in good-will as being necessary, we could as well share the personal data with any third parties who are involved and intervene with the legal procedures.
- We would hereby like to remind you once again that pursuant to such regulatory practices currently in effect, primarily Law Number 5651 Concerning Regulation Of Publications Made On Internet Media and Combating Crimes Committed Through Such Publications and Law Number 6563 About Regulation Of Electronic Commerce, we are obligated to share your personal data with the prescribed competent authorities.

Security

We are protecting your data by adopting any convenient technical and administrative security measures to reduce any risks like personal data loss, improper/bad usage, unauthorized access, unauthorized transfer. It is included in certain of such measures we are implementing, new generation security strata, security/firewalls and data encryption, controlling physical access to our data centers as well as data access authorization controls. In case you suspect that your account is ill-treated, kindly access and contact us from the section at the Site dedicated to support. We are recommending to use in your password unique numbers, capital and small letters and characters and that it is not used on any other site. You should refrain from sharing your password with other persons. If you share your password with others, you shall be held responsible for any and all operations and transactions made by such other persons over your account. We would like to remind that losing control of your password could possibly result with losing control of your personal data.

Your Rights

In addition to your rights provided under the section dedicated to access:

- You are entitled to file an application with our side under scope of Law Number 6698 About Protection of Personal Data and learn whether or not any of your personal data are processed and if processed, you would be entitled to demand information therefor. Thus, pursuant to Article 11 of Law Number 6698 About Protection of Personal Data,
- You could learn whether or not your personal data are/were used in accordance with the purpose for processing the same;
- Learn to which third parties your personal data could be transferred either locally or abroad;
- Ask for correction/rectification of any of your personal data processed as incomplete or inaccurate, deletion or elimination and be made anonymous such personal data of yours in the event reasons necessitating processing are removed. You could as well

ask for advising such third parties whom your personal data are transferred,
regarding the said correction, elimination and deletion operations so made;

In case you wish to obtain further information regarding confidentiality and protection of personal data, we are ready and at your disposal to provide you assistance over support@ahicoin.org.