

BARTKA İNOVASYON ARAŞTIRMA GELİŞTİRME A.Ş.
PRIVACY INFORMATION
FOR THE PROCESSING OF PERSONAL DATA
OF MOBILE APPLICATION USERS

1. Data Controller

Your personal data is processed by Bartka İnovasyon Araştırma Geliştirme A.Ş. ("Company") who is located at Göktürk Merkez Mah Çamlık Caddesi 36/1A Eyüpsultan/İstanbul, as the data controller, within the scope of the provisions of the Law No. 6698 on the Protection of Personal Data ("LPPD") and in accordance with the framework of this Privacy Information for the Processing of Personal Data of Mobile Application Users ("Disclosure Text").

Our Company respects your concerns regarding the protection of your privacy and personal data and works to establish and maintain a trust-based relationship with you. In this context, our Company processes your personal data in accordance with the provisions of all legislation on the protection of personal data, especially LPPD, ensures that your data is securely hosted and takes all necessary security measures against possible unlawful access. This Disclosure Text explains the scope of processing of your personal data collected within the framework of the registration and use of the Budizzz mobile application offered by or on behalf and account of our Company.

2. Collection Method of Your Personal Data

Your personal data is collected by our Company through electronic and/or physical media, Budizzz mobile application, printed forms (contracts, technical support forms, invoices, etc.), call / contact centre, e-mail, SMS, telephone, fax, cargo / mail, cookies and other identification technologies, request / complaint platforms, authorized public institutions and organizations and integrated systems belonging to other third parties, provided that they are fully or partially automated or part of any data recording system.

3. Categories of Personal Data Processed, Purposes of Processing Your Personal Data and Legal Reasons

Within the scope of the personal data processing conditions specified in Articles 5 and 6 of the LPPD, details of your personal data processed for and due to operations of: creating, updating and cancelling membership to the Budizzz mobile application; fulfilment of the Company's obligations arising from the membership agreement; providing subscriptions, carrying out payment processes arising from the subscription relationship, collecting payments; realizing customer notifications regarding products or services (e.g. legal notifications); controlling the number and duration of listening in order to determine the entitlement of content producers; invoice issuance/cancellation and other accounting and finance transactions; customer relations management; evaluation and resolution of requests and/or complaints; ensuring customer satisfaction; ensuring information security, data accuracy, quality standards; promoting our Company and our Company's products and/or services and creating and/or increasing loyalty to them; Activities to increase the brand recognition / awareness of our Company; activities to be developed on customer acquisition or value creation in existing customers; marketing analysis studies (e.g. profiling,

segmentation, targeting, retargeting, data enrichment); measurement and reporting of campaign / marketing performances; social media communication and interaction activities; advertising, campaigns, offers, promotions, surveys, sweepstakes, launches, events, competitions, events, promotions, commercial electronic communications and other direct and / or indirect personalized / mass marketing activities and the purposes of processing your personal data within the scope of the execution of the activities of fulfilling the obligations arising from the legislation are explained in detail below.

Category of Personal Data	Purposes of Processing Personal Data and Legal Grounds for Processing
<p>Identity Data</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (a) of paragraph 2 of Article 5 of the LPPD</i> where processing is explicitly provided for in the laws, <i>pursuant to subparagraph (c)</i> where processing is necessary for the conclusion or performance of a contract to which the data subject is a party, <i>pursuant to subparagraph (ç)</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Execution of Finance and Accounting Affairs ● Execution of Company/Product/Service Loyalty Processes ● Monitoring and Execution of Legal Affairs ● Execution of Communication Activities ● Execution/Supervision of Business Activities ● Execution of Activities for Ensuring Business Continuity ● Execution of After Sales Support Services for Goods and/or Services ● Execution of Goods and/or Service Sales Processes ● Execution of Customer Relationship Management Processes ● Execution of Customer Satisfaction Activities ● Execution of Storage and Archive Activities ● Execution of Contract Processes ● Follow-up of Requests and/or Complaints ● Execution of Supply Chain Management Processes ● Providing Information to Authorized Persons, Institutions and Organizations <p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for</p>

	<p>the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Services Loyalty Processes ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services
<p>Communication Data</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (a) of paragraph 2 of Article 5 of the LPPD</i> where processing is explicitly provided for in the laws, <i>pursuant to subparagraph (c)</i> where processing is necessary for the conclusion or performance of a contract to which the data subject is a party, <i>pursuant to subparagraph (ç)</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Execution of Finance and Accounting Affairs ● Execution of Company/Product/Service Loyalty Processes ● Monitoring and Execution of Legal Affairs ● Execution of Communication Activities ● Execution/Supervision of Business Activities ● Execution of Activities for Ensuring Business Continuity ● Execution of After Sales Support Services for Goods and/or Services ● Execution of Goods/Service Sales Processes ● Execution of Customer Relationship Management Processes ● Execution of Activities for Customer Satisfaction ● Execution of Storage and Archive Activities ● Execution of Contract Processes ● Follow-up of Requests and/or Complaints ● Execution of Supply Chain Management Processes ● Providing Information to Authorized Persons, Institutions and Organizations

	<p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Service Loyalty Processes ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services
<p>Finance Data</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (a) of paragraph 2 of Article 5 of the LPPD</i> where processing is explicitly provided for in the laws, <i>pursuant to subparagraph (c)</i> where processing is necessary for the conclusion or performance of a contract to which the data subject is a party, <i>pursuant to subparagraph (ç)</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Execution of Finance and Accounting Affairs ● Monitoring and Execution of Legal Affairs ● Execution / Supervision of Business Activities ● Execution of Goods / Services After Sales Support Services ● Execution of Goods / Service Sales Processes ● Execution of Customer Relationship Management Processes ● Execution of Storage and Archive Activities ● Execution of Contract Processes ● Follow-up of Requests / Complaints ● Providing Information to Authorized Persons, Institutions and Organizations <p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Service Loyalty Processes

	<ul style="list-style-type: none"> ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services
<p>Legal Information Process</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (ç) of paragraph 2 of Article 5 of the LPPD</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Monitoring and Execution of Legal Affairs ● Execution of Goods / Services After Sales Support Services ● Execution of Storage and Archive Activities ● Execution of Contract Processes ● Follow-up of Requests / Complaints ● Providing Information to Authorized Persons, Institutions and Organizations
<p>Transaction Data Security</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (a) of paragraph 2 of Article 5 of the LPPD</i> where processing is explicitly provided for in the laws, <i>pursuant to subparagraph (c)</i> where processing is necessary for the conclusion or performance of a contract to which the data subject is a party, <i>pursuant to subparagraph (ç)</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Execution of Goods / Service Sales Processes

	<ul style="list-style-type: none"> ● Execution of Customer Relationship Management Processes ● Execution of Storage and Archive Activities ● Execution of Contract Processes ● Follow-up of Requests / Complaints ● Ensuring the Security of Data Controller Operations ● Providing Information to Authorized Persons, Institutions and Organizations <p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Service Loyalty Processes ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services
<p>Customer Transaction Information</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (a) of paragraph 2 of Article 5 of the LPPD</i> where processing is explicitly provided for in the laws, <i>pursuant to subparagraph (c)</i> where processing is necessary for the conclusion or performance of a contract to which the data subject is a party, <i>pursuant to subparagraph (ç)</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Execution of Finance and Accounting Affairs ● Monitoring and Execution of Legal Affairs ● Execution / Supervision of Business Activities ● Execution of Goods / Service Sales Processes ● Execution of After Sales Support Services for Goods/Services ● Execution of Customer Relationship Management Processes ● Providing Information to Authorized Persons, Institutions and Organizations ● Execution of Storage and Archive Activities

	<ul style="list-style-type: none"> ● Execution of Contract Processes ● Follow-up of Requests / Complaints ● Ensuring the Security of Data Controller Operations ● Providing Information to Authorized Persons, Institutions and Organizations <p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Service Loyalty Processes ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services
<p>Marketing Data <i>(membership/shopping history information)</i></p>	<p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Service Loyalty Processes ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services
<p>Audio and Visual Data <i>(Processed if you contact customer services within the scope of profile picture and membership processes).</i></p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (c) of paragraph 2 of Article 5 of the LPPD</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Execution of Activities in Compliance with the Legislation ● Monitoring and Execution of Legal Affairs ● Conducting Internal Audit / Investigation / Intelligence Activities

	<ul style="list-style-type: none"> ● Execution of Customer Relationship Management Processes ● Execution of Activities for Customer Satisfaction ● Execution of Storage and Archive Activities ● Ensuring the Security of Data Controller Operations ● Providing Information to Authorized Persons, Institutions and Organizations
<p>Request / Complaint Data</p>	<p>Your personal data under this category are processed within the scope of following personal data processing conditions (legal reasons); <i>pursuant to subparagraph (ç) of paragraph 2 of Article 5 of the LPPD</i> where processing is necessary for compliance with a legal obligation to which the data controller is subject, <i>pursuant to subparagraph (e)</i> if the data processing is mandatory for the establishment, exercise or protection of a right and <i>pursuant to subparagraph (f)</i> if the data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. Purposes of processing such personal data are as follows:</p> <ul style="list-style-type: none"> ● Conducting Audit / Ethics Activities ● Monitoring and Execution of Legal Affairs ● Execution of Communication Activities ● Execution / Supervision of Business Activities ● Receiving and Evaluating Suggestions for Improvement of Business Processes ● Execution of Customer Relationship Management Processes ● Execution of Activities for Customer Satisfaction ● Execution of Storage and Archive Activities ● Follow-up of Requests / Complaints ● Providing Information to Authorized Persons, Institutions and Organizations <p>Your data in this category are processed pursuant to the explicit consent personal data processing condition (legal reason) and for the following purposes in accordance with paragraph 1 of Article 5 of the LPPD:</p> <ul style="list-style-type: none"> ● Execution of Company / Product / Service Loyalty Processes ● Execution of Advertising / Campaign / Promotion Processes ● Organization and Event Management ● Conducting Marketing Analysis Studies ● Execution of Communication Activities ● Execution of Storage and Archive Activities ● Execution of Marketing Processes of Products / Services

4. Transfer of Your Personal Data to Third Parties Residing in Turkey and/or Abroad

Within our Company, your personal data can only be accessed by our employees with limited authorization to the extent necessary to fulfil their duties for the purposes detailed above.

On the other hand, your collected personal data may be transferred to the following recipient groups in accordance with the personal data transfer conditions specified in Articles 8 and 9 of the LPPD and if the personal data processing conditions (legal reasons) specified above for the relevant data category are also available for the purposes of transfer.

- Your personal data limited to identity, communication, legal transaction, customer transaction, transaction security, finance, marketing, visual and audio, request / complaint data can be transferred to our domestic and / or foreign suppliers, including our group companies acting as suppliers (*e.g. legal consultants, audit companies, companies providing customer service services, agencies, companies providing services within the scope of events and organizations, and information technologies and data hosting service providers*) for the purposes (*especially for the purpose of providing products and / or services for the execution of the Company's activities*) specified in the relevant category for each data category above,
- Your personal data limited to identity, communication, legal transaction, customer transaction, transaction security, finance, marketing, audio-visual and request/complaint data can be transferred to potential buyers, sellers or other parties who are the addressees of the transaction, and their employees, consultants and database service providers involved in the relevant process for the purposes (*especially for the purpose of carrying out the legal and financial review activities of our Company in possible company mergers, acquisitions, joint ventures, spin-offs and other structural changes*) specified in the relevant category for each data category above,
- Your personal data limited to identity, communication, legal transaction, customer transaction, transaction security, finance, marketing, visual and audio, request / complaint data can be transferred to authorized public institutions and organizations (*e.g. courts*) located in Turkey and/or abroad for the purposes (especially for the purposes of fulfilling the legal obligations of our company and following up legal affairs) specified in the relevant category for each data category above.

Subscription payments are received through the application market where the mobile application is installed on your device, and we do not collect and transfer any payment information (*card information, etc.*) in this context.

5. Kişisel Verilerinizin İşlenme Süresi

Your personal data obtained during our company activities are stored and destroyed in accordance with the general principles and regulations specified in our Company's policies and procedures regarding the storage and destruction of personal data, which are prepared in accordance with the provisions of the Constitution, the LPPD, the Regulation on Deletion, Destruction or Anonymization of Personal Data and other relevant legislation.

In this context, your personal data will be destroyed in the event that all of the above-mentioned personal data processing conditions disappear within the scope of Articles 5 and 6 of the LPPD. Accordingly, your personal data will continue to be processed during the legal time-out periods following the termination of your relationship with our Company or the application and/or provision of products and/or services. Your personal data processed based

on the explicit consent personal data processing condition will be destroyed in the first destruction period if you withdraw your explicit consent. In terms of your requests regarding the destruction of your personal data, we kindly request you to review section 6 of this Disclosure Text.

6. Your Rights under the LPPD

As a personal data owner, we would like to inform you that you have the following rights pursuant to Article 11 of the LPPD:

- To learn whether your personal data is being processed or not,
- Request information if your personal data has been processed,
- To learn the purpose of processing of your personal data and whether they are used in accordance with their purpose,
- To know the third parties in Turkey or abroad to whom your personal data is transferred,
- To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
- To request the deletion or destruction of your personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the Law and other relevant laws, and to request notification of the transactions made within this scope to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result to the detriment of the person himself/herself by analysing your processed data exclusively through automated systems,
- In case of damage due to unlawful processing of your personal data, to demand compensation for the damage.

You can submit your requests regarding your rights mentioned above to the Data Controller in accordance with the provisions of the Regulation on the Procedures and Principles of Application to the Data Controller (in written form or electronically through a registered e-mail (KEP) address, secure electronic signature, mobile signature, or via the e-mail address you have previously notified to the Company and registered in our systems, in order for our Company to verify your real ownership through identifying information/documents* (such as your ID number for Turkish citizens or passport number for citizens of other countries, your residential/work address, mobile phone/telephone/fax number, e-mail address, etc.). You can access the Relevant Person Application Form [here](#) and fill it out, or you can submit it to our Company through the channels specified in the Data Controller's Relevant Person Application Form in accordance with the procedures and principles regulated in the relevant legislation. Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within 30 (thirty) days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

* We would like to remind you that no special categories of personal data (*e.g. religious information or blood type information*) should be included within the scope of these documents.

