



According to 6698 Numbered Personal Data Protection Law

USER CLARIFICATION TEXT AND PRIVACY POLICY

("Clarificaiton Text", "Policy")

Rezypay Teknoloji Yazılım ve Ticaret Anonim Şirketi ("Rezy" or "Company") cares about secure and transparent processing of your personal data in accordance with the law and in goodwill; this Clarificaiton Text is prepared to signify the purpose of why and how your personal data will be processed and to explain how you can manage your preferences regarding the subject. For the terms not defined in the Clarification Text, the terms published on the Platform's service contract will prevail.

Below, you can find detailed explanations as to Rezy's purpose of processing and transferring the data you provide in transactions such as making a service contract on the Platform according to 6698 numbered Personal Data Protection Law ("**Law**") as a "user" or without signig up to rezypay.com (**Platform**).

On Rezy's app that users download via virtual markets on their mobile phones, users that rent a residential or commercial property for use to another user with a verbal and/or written rental contract will be referred to as ("**Lessor**") and the lessee of the properties ("**Lessee**"), Rezy's applicaiton Rezy ("**Application**") and/or Rezy's website rezypay.com or a website operating under another domain ("Web Site")

Web Site and Application will be jointly and severally referred to as ("Platform").

Lessee and Lessor will be jointly and severally referred to as ("**User/s**")

In case the guarantor ("Guarantor"), who will be personally responsible for Lessee's failure to pay their debt to Lessor according to the rent contract between them, fulfill its obligations, Guarantor's necessary personal data can be uploaded to the Platform by the Users and processed in accordance with this Policy.

You can feel secure when you use the Platform. However, please do not forget that no system is fully secure. Although we take all the necessary precautions and steps to protect your data, there is a possibility of exposure. Therefore, we would like to remind you to be very careful when you share your data. Processing of the Data you provided that is not requested by the Company, according to this Policy, will not be regarded as personal data processed by the Company. In that regard, we firmly notify you to

not share your voice, image or any other data that is not requested by the Company that is not limited to these via email or text message or any other communication channel.

a) Personal Data Collection, Collection Methods, and Legal Reasons

The information you send to Rezy, collected by Rezy, shared with Rezy on the WebSite and/or Application, and/or accessible data can be regarded within the scope of personal data. If you access Rezy, regardless of benefiting from its service or not, the data specified below about you or your use of our services via various sources is collected:

- **Record Information:** For users to use Rezy's services, they have to sign Rezy User and Membership Contracts and sign up to Rezy. For signing up, User's name, last name, phone number, e-mail address, and password to be used on the Platform must be entered.
- **Service Information:** The Lessee or Lessor, to benefits from Rezy's services, will register the home addresses, residence addresses, T.R. ID Numbers, commercial and/or not commercial terms such as rent amount and other required information specified in the rental contract between them to the Platform.
- **Financial Information:** Users will be able to perform the debt and obligations arising from the rent contract between them. In that regard, various payment methods are set forth. Rezy can process the users' IBAN, account information, branch information and other financial data. Rezy can also process data regarding the completion or incompleteness of rent payment to ensure a healthy relationship between the users and performance of debt and obligations in full.
- **Legal Information:** Rezy, within the scope of its services, can process the users' rent contract information, case information related to services, legal information shared by judicial and administrative authorities, information related to the lessor's letter of attorney that allows for legal tracking processes.
- **Usage Information:** Regardless of benefiting from Rezy's services, in case of access to the Platform, data about you will be collected. Information pertaining to your visit of the Platform, what you click on it, and when you perform these actions, etc. can be included. Also, today, many websites hold daily files; these files save the data when a device accesses them. Daily files include; source IP

addresses, internet service providers, viewed files on the site (ie; HTML pages, graphics, etc.) operating system versions, time cache and all access related information.

- **Communication Information:** Users can also communicate with each other on the Platform. Therefore the information; is all communication and traffic records between the Lessee and Lessor provided over the Platform.
- **Device Data:** From the devices and applications you use to access our services, IP address, operating system version, device type, system and performance information and browser type data are collected.
- **Instant Notifications:** When you use Rezy app, from time to time, instant notifications regarding services, products, special offers and promotions will be sent over the application to notify or warn. If you do not want to receive these notifications, you can turn the related notifications off from your device settings.
- **Location Information:** Rezy does not collect location data without your permission. However, we may ask for your permission to collect, share, and process your special location data on your device in order to develop the services and offers we provide you by using data like GPS, Wi-Fi access points, bluetooth. You can disable on your device the permission you grant us to use the location access services. Also, your IP address and other device identity information can be used by Rezy for your approximate location information such as your city or region.
- **Application and Collected Information:** Certain services provided by Rezy can be provided through mobile phone, tablet, computer, and similar devices. The Application can collect personal information and the data (name, age, sex, address, etc.) you provide or automatically collected and stored data. Also, we may use regularly collected technical and relevant data including but not limited to the preferred language, phone number registered to your mobile device or other private device identity information, technical data about your mobile device, system and application software and accessories, similar mobile application and (if exists) software updates we provide you with, product support and other services. Moreover, we may merge private device identity information and application usage information with the personal data you provide, yet as long as the data is merged, it will be considered as personal data.
- **Your Information Provided by Third Parties:** We can support the data we provided about you with the data we gain from third parties to increase our capacity to serve you, privatize the content we

present to you, or promote financial products and services we believe that may attract your attention. We can merge the information retrieved from external sources with the ones collected through our services. We use all the information collected from you and third parties according to this Policy.

- **Information Collected by Third Parties:** Rezy can provide in its own terms a third party that is not subject to this policy with a link to its websites. Rezy has no control over these third party websites, these websites can download their own cookies and other files to your device, can collect data, website usage information, and device data information or request personal data from you. We are not responsible for third parties' privacy applications. We ask you to be careful when you leave our services and read the privacy policy and service terms of third party websites and applications.

b) Veri Kategorileri ve Veri Türleri

1. Lessor	Identity Information	Name-Lastname, T.R. ID No. D.O.B, Place of Birth, Marital Status, Passport No., Nationality
	Contact Information	Home address, residence address and all other shared addresses, e-mail, phone/mobile phone
	Financial Information	Bank account information, IBAN, payment information
	Legal Action and Adaptability Information	Contracts (including information connected to rent contracts), case files, letter of attorney, all legal documents shared by judicial and administrative authorities.
	Transaction Security	Pc/e-mail/system and application user transaction information, internet traffic data (network movements, IP address, visit data, time and date info), cookies
	Other: Communication Information	All communication and traffic information of Lessee and Lessor from the communication services over the Platform
	Identity Information	Name-Lastname, T.R. ID No. D.O.B, Place of Birth, Marital Status, Passport No., Nationality
	Communication Information	Home address, residence address and all other shared addresses, e-mail, phone/mobile phone
	Financial Information	Payment Information

2. Lessee	Legal Action and Adaptability Informaiton	Contracts (including information connected to rent contracts), case files, letter of attorney, all legal documents shared by judicial and administrative authorities.
	Transaction Security	Pc/e-mail/system and application user transaction information, internet traffic data (network movements, IP address, visit data, time and date info), cookies
	Other: Communicaiton Informaiton	All communication and traffic information of Lessee and Lessor from the communication services over the Platform
3. Visitor	Transaction Security	Pc/e-mail/system and application user transaction information, internet traffic data (network movements, IP address, visit data, time and date info), cookies
4. Guarantor	Identity Information	Name, Lastname, T.R. ID No.
	Contact Information	Address

c) How do our company obtain your personal data and through which methods?

Our company collects via the Platform;

- (i) Your name, lastname, e-mail address, mobile phone number, date of birth, sex during your membership process on the Platform,
- (ii) IP address information, website entry exit information, security information like password, which are processed via cache on the Platform (you can access detailed information on “Rezy Cookies Policy” text found on the Platform) during membership processes on the Platform or using the services of the Platform without signing up,

Name, lastname, e-mail address, mobile phone number and address within the scope of service contract on the platform when you receive a service by making a service contract on the Platform,
- (iii) Credit/debit card owner’s name, lastname, credit/debit card number, expiration date, CVV (card validation value) security code to be used for payment in the payment phase regardless of becoming a member on the Platform.

By the Company, your data may be collected when you make a contract on the Platform as a user or, as explained above, by making a service contract without signing up, upon your confirmation at the moment the contract is composed or in the following period when you render to the Company via a verbal, written, electronical setting or on rezy.com address when you complete a payment or similar action for which you save information or make a request or complaint by registering as a user or without registering. Provided that your personal data collected in this process is directly related to the establishment or performance of the contract with the Company within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law, you are a party to the contract, in case of any dispute that may arise due to a legal relationship due to your legal relationship with the Company. It can be processed and transmitted for the purposes of exercising the right of defense or for the purpose of evaluating the user satisfaction surveys conducted by our Company with your explicit consent.

To leave no doubt, obligation to keep the personal data up-to-date specified in Clause 2-b of Article 4 of the Law will be limited to personal or private personal data shared with the Company over the Platform as a user or without being a user. The company is obligated to take all technical and administrative precautions to prevent unlawful processing of personal data, deny unlawful access to data, ensure appropriate security protocol to preserve the data.

d) On what legal basis do our company obtain your personal data?

Your personal data obtained through the methods specified above, “the necessity to process personal data belonging to the parties of a contract on the condition that it is directly related to the making or announcement of the contract” (ie. Rezy Service Contract), “alienation of the related party”, “the requirement to process data for the rightful benefit of the data responsible, without harming the person’s natural rights and freedom” and “the necessity to keep the tangible and intangible integrity of a person that is physically incapable to render consent or for whom the consent has no legal ground” based on such legal reasons, in accordance with the purposes specified in this Clarification Text, can be retrieved to be processed and transferred.

e) For which purposes do our company process your personal data?

Collected data will be processed according to the terms of personal data processing purposes (“Purposes”) specified in Article 4 of the Law for Platform services to be rendered and performed without issues, for the completion of services and payments in accordance with the service contract, in

that regard, with the purpose of rendering an order record to be delivered by you and a designated third party to the receiver.

f) To whom and for what purpose our company may transfer your personal data?

Your personal data obtained by our Company; to fulfill the Purposes mentioned above; may be transferred in accordance with the related guide and this Clarification Text on a physical or electronic setting, within a suitable time and storing period, to legally authorized private or legal persons and authorities, to our shareholders and subsidiaries that will act as data responsible, to our suppliers or contracted operational support partners, to a third party designated by you, to our employees that work to deliver to the persons of your choice upon your request, for your payment and orders and their supply to be completed within the scope of the service contract, for providing the services on the Platform.

The Company can transfer data to fulfill its legal obligations, use its right to defend, carry out marketing and research activities, to inform users of people that receive services over the Platform regarding the Platform's processing, update, and developments, to keep statistics and for company planning, operational excellence and development, maximize customer satisfaction regardless of their status as a user, and to provide platform services over the Platform.

Moreover, the Company, reports to the authorities appropriately the data required by the related regulation or requested by public authorities in order to fulfill the Company's obligation to inform. The personal data transferred according to this article, by the third party receiving the data, can be recorded, stored, preserved, altered, remade, explained, transferred, taken over, classified, processed or denied the use of data.

g) How long will your personal data be stored?

The Company, in case it is foreseen in the law and related bylaw, will store the personal data according to the time period specified in these regulations.

If the purpose of processing personal data is expired; the period to store designated by the company and according to the related bylaw is over; the personal data will only be stored as evidence in case of legal conflicts or in case a related right is set forth regarding the personal data or raised for the right to defend.

In such cases, the stored data cannot be accessed with another reason and can only be accessed when their use is required in case of a legal conflict. When the aforementioned period is over, the data is

deleted, destructed, and anonymized. The Company, terms specified in the related regulation and this Clarification Text, declares to ensure;

- Legal processing of personal data
- Deny any unlawful access to personal data
- Take the necessary technical and administrative precautions to ensure proper safety protocol and carry out required audits to preserve personal data

h) Removal, Termination, Destruction of Your Personal Data:

Your personal data kept under the law; will be kept confidential for the period specified in the relevant legislation or maximum period required for the purpose for which they are processed, and possibly for the statutory limitation period. Even though it has been processed in accordance with the provisions of the relevant law as regulated in Article 138 of the Turkish Penal Code and Article 7 of the Law, in the event that the reasons requiring its processing are eliminated, personal data ex officio will be Erased, Destructed or Anonymized within the scope of Company Retention and Destruction Policy and under the conditions determined in accordance with the Regulation on the Erasure, Destruction or Anonymization of Personal Data which was published on the Official Gazette No. 30224 and dated 28.10.2017 .

i) Rights of the Personal Data Owner Enumerated in Article 11 of the Law

According to Article 11 of the Law, personal data owners;

- To learn whether his/her personal data are processed or not,
- To demand for information as to his/her personal data have been processed,
- To learn the purpose processing of his/her data and whether these personal data are used in compliance with the purpose,
- To know the third parties to whom his personal data are transferred in country or abroad,
- To request the rectification of the incomplete or inaccurate data, if any, and to request notification to request reporting of the operations carried out within this scope to third parties to whom his personal data have been transferred,
- To request the erasure or destruction of personal data in the event that the reasons requiring its processing cease to exist even though it has been processed in accordance with the

provisions of the law and other relevant laws and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred.

- To object to the occurrence of a result against the person himself/herself by analyzing the processed data solely through automated systems,
- To claim compensation for the damage arising from the unlawful processing of his/her personal data

As the personal data owners, you can state your requests regarding your rights to our Company via the KVK Application Form shared with the public on the Platform's website.

j) Regarding Cookies

The Company may obtain information about users' use of the Platform by using cookies, which is a technical communication file, process the data in this context, and transmit it to third parties for the purpose of processing within the scope of analysis services offered by third parties, only to be used to the extent required by these analysis services. The technical communication files mentioned are small text files that the Site sends to the users' browser to be stored in the primary memory. The technical communication file facilitates the use of the internet in this sense by storing the status and preference settings about a website. Technical communication file is used in order to obtain statistical information about how many people use the Platform in temporal proportion, for what purpose, how many times a person visits the Platform and how long they stay, and to help generate advertisements and content dynamically from user pages specially designed for users. The technical communication file is not designed to receive any other personal data from the primary memory. Most of the browsers are initially designed to accept the technical communication file, however users will always be able to change the browser settings so that the technical communication file is not received or a warning is given when the technical communication file is sent. You can find details about cookies in the "Cookie Policy" on the Platform. The Company will be able to identify and use the IP address of the users when necessary, in order to identify the problems related to the system and to solve the problems immediately. IP addresses may also be used to identify users in a general way and to collect comprehensive demographic information.

k) Communication Permission

For the purpose of providing and presenting various advantages to you and sending all kinds of electronic communication and other communication messages for advertising, sales, marketing, survey,

reservation privilege and similar purposes, your personal data specified in this Policy and that you have given your consent to be shared with us with electronic communication permission. ; You consent to the collection, storage, processing, use, transfer. The Company will contact users via mail with the purpose of verifying with their e-mail address during registration, verifying that they are the right person when the password is forgotten, creating a website, personalizing the website when necessary, advertising on the website, sharing the website, etc., for security reasons, and sending e-invoices; and via phone or SMS with the purpose of hone number verification during registration, notification as a two-factor authentication method, notification for security reasons to verify that you are the right person when you forget your password.

l) Privacy in Terms of Age Limit

The Company, will not intentionally collect and record data of persons under 18. If you are under 18, we warn you that you should not use the Platform and the services offered on the Platform and that you should not share any of your personal data with the Company. The Company will take reasonable steps to delete the data as soon as possible as it becomes known that the data of a person under 18 has been collected.

m) Policy Changes

The company may change the provisions of this Policy at any time by publishing it on the Platform. Policy provisions amended by Company will come into force on the date of publication. The Company will inform the users about the changes made in Isbu Policy.

n) Dispute Resolution

Isbu Policy is subject to the laws of Republic of Turkey. All disputes arising from the Policy or related to this Agreement will be resolved in Istanbul Merkez(Caglayan) Courthouse and enforcement offices.