

SERVICE RECIPIENT / PERSONAL DATA OWNER DISCLOSURE STATEMENT

Update Date: 16.06.2025

Dear Valued Customer,

As **EVERHUB INFORMATION TECHNOLOGIES LTD. CO.** ("Company" or "Everhub"), we aim to inform you, our esteemed users of Everhub products and services, through this Disclosure Text about how we process personal data within the scope specified in Article 10 of Law No. 6698 on the Protection of Personal Data ("KVK" or "Law"). We prioritize the security and protection of your personal data shared with us.

1. WHAT IS THE PURPOSE AND THE SCOPE OF DISCLOSURE STATEMENT?

Everhub is a "Data Controller" as defined in the Law. In this context, we process your personal data in compliance with the Law and take appropriate, proportionate, and adequate administrative and technical measures for the protection of your personal data. For information on the processing of personal data and fundamental concepts regarding personal data, you may review our Information Security Policy.

2. WHO ARE WE AS THE DATA CONTROLLER?

As the Data Controller, we fulfill our obligations arising from laws and Board decisions by taking administrative measures and appropriate, proportionate-level technical measures. Our corporate information and contact details are as follows:

Title :	EVERHUB BİLİŞİM TEKNOLOJİLERİ LTD.ŞTİ.
Address :	Kozyatağı Mah. Gülbahar Sok. Ar Plaza C Blok No:13/3 K:4 Kadıköy/İstanbul
Websites:	https://www.everhub.com.tr/
Phone :	+90 216 210 19 03
E-Mail (Data Subject Requests):	info@everhub.com.tr

3. WHICH OF YOUR PERSONAL DATA DO WE PROCESS?

Everhub processes the following categories of personal data and special categories of personal data of service recipients/data subjects.

Category	Description
Identity	Name/Surname, TR ID No, Mother/Father's Name, Date of Birth, Place of Birth, ID Card Serial Number, etc.
Contact	E-mail address, Contact Address, Registered E-mail address (KEP), Phone No etc.
Legal Transaction	Information correspondance with judicial authorities, lawsuit file information, guardian/trustee information.
Customer Transaction	Transaction owner info, transaction number, process creation date, processing date, payment date, transaction amount, any requesta and complaints submitted by the user, any comments added during the execution of the transaction, and all related records and reports, etc.
Physical Security Space	Entry/Exit records of employees/visitors, camera recordings etc.
Security Transactions of	Password information, security question, certificate, encryption key, IP address information, website login/logout data, user's first and last name, CVV2, CVC2 code, etc.
Risk Management	All information that may be used within the scope of financial security and risk management activities, including KYC (Know Your Customer) principles, AML (Anti-Money Laundering), and antifraud (Fraud Prevention).
Finance	Bank name, account number, IBAN number, account balance information, etc.
Marketing	Purchase history information, surveys, cookie records, data obtained through discount and campaign activities, etc.

Visual and Audio Recordings	Such as photographs on identity documents, images on social media platforms, and call center voice recordings.
Biometric Data	Biometric, visual, and auditory records obtained through facial recognition for identity verification and authentication, as well as remote identity verification.
Other Information	Signature, signature circulars, etc.

4. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

Your personal data collected will be processed within the scope of the purposes stated below, in accordance with the principles, rules, and procedures set forth in Articles 4, 5, and 6 of the Law:

- Execution of Emergency management Processes,
- Execution of Information Security Processes,
- o Fulfilment of verification procedures such as SMS and 3D Secure related to payment transactions in physical and online shopping,
- Ensuring the Security of Data Controller Operations; multilayered identity verification to prevent illegal activities such as fraud and money laundering,
- Execution of Product / Service Sales Processes,
- Execution of Contractual Processes: verification of your identity for the purpose of obtaining your consent establishing the contract,
- o Carrying out identity verification procedures required after the contract establishment,
- Provision of Information to Authorized Persons, Institutions, and Organizations: responding to information and document requests from institutions/organizations to which we have audit and notification obligations, such as MASAK, Central Bank of the Republic of Turkey, judicial authorities,
- o Cooperation with licensed entities for international transfers,
- Conducting / Auditing Business Activities: monitoring and controlling limited uses,
- Conducting Audit / Ethical Activities,
- Execution of Finance and Accounting Operations,

- Execution of Product / Service Marketing Processes: planning and/or managing activities such as data analysis, research, proposal presentation, statistical studies, and trend analysis for the purpose of marketing Everhub's products and/or services,
- o Sending commercial electronic communications to introduce new Everhub products and services within the scope of customer relationship management
- o Cooperation with representative organizations to promote the use of Everhub services,
- Completion of necessary approval and activation procedures for campaigns and discount transactions,
- Conducting Activities in Compliance with Legislation,
- Execution of Storage and Archiving Activities,
- Managing Maintenance / Repair Processes,
- Tracking Requests and Complaints; evaluation of refund requests in expenditure objections,

5. HOW DO WE PROCESS AND PROTECT PERSONAL DATA?

We take great care to process your data in accordance with the principles listed in Article 4 and the conditions specified in Articles 5 and 6 of the Law.

Your personal data is processed through both automated and non-automated means, in electronic environments such as **instant messaging platforms, email, online customer support services, call centers, servers, and social media**, and occasionally in physical environments such as office documents.

As **Everhub**, we take all necessary technical and administrative measures — appropriate and proportionate — to protect the personal data we process, to prevent it from being accessed by unauthorized persons, and to avoid any harm to data subjects. Within this framework, we ensure that our applications, software, and IT systems comply with standards and are kept up to date; we sign data transfer agreements with third parties to whom data is shared; and we ensure that our employees who access personal data act in accordance with the “Confidentiality Undertaking” they have signed.

In the processing activities carried out by Everhub for the purposes of remote identity verification and customer onboarding, your biometric data — which qualifies as sensitive personal data — as well as your visual and/or audio data may be processed through technologies that support facial recognition.

Additionally, should you become a customer of “Everhub” and open an account, your personal data may be processed solely for and limited to the provision of services specific to this purpose.

Moreover, with regard to the processing of sensitive personal data, all necessary technical and administrative security measures specified in the Personal Data Protection Board's Decision No. 2018/10, titled "Adequate Precautions to Be Taken by Data Controllers in the Processing of Sensitive Personal Data," are implemented in accordance with Article 6 of the Law, in order to ensure the secure storage of the data and to prevent unlawful access or use.

Furthermore, for the purpose of ensuring the security of users' financial data, your personal data is stored by Everhub in compliance with PCI DSS (Payment Card Industry Data Security Standard).

6. WHY AND WITH WHOM DO WE SHARE PERSONAL DATA?

The personal data of Everhub users, to the extent necessary, may be transferred — for the purposes listed below — to domestic and international entities including: official and private institutions/organizations within Türkiye with which we have business relations, group companies, and service providers or solution partners from whom we receive administrative, legal, and technical support, in accordance with Articles 8 and 9 of the Law.

As a data controller, Everhub conducts necessary checks to the extent possible in order to ensure that the institutions and organizations with which it shares data fulfill their obligations arising from the Law, and secures these obligations through data transfer agreements, data processing agreements, and undertakings.

6.1 What is the Nature and Scope of Domestic Sharing/Access?

We share personal data with the following parties located within Türkiye, who act as data controllers and/or data processors, for the purposes specified below.

1- Banks – For the execution of operational processes related to payments for Everhub products and services,

2- Law Firm – For the conduct of legal affairs and litigation, completion of contract processes, and provision of information to authorized persons, institutions, and organizations,

3- Executives and Shareholders – For the conduct of corporate governance activities,

4- Business Partners – For the execution and audit of business operations, offering Everhub services tailored to user preferences, usage habits and needs, providing benefits to the User, organizing personalized campaigns and promotional activities, and ensuring legal and commercial business security,

5- Official Authorities and Public Institutions (such as the Banking Regulation and Supervision Agency [BDDK], the Central Bank of the Republic of Türkiye, the Financial Crimes Investigation Board [MASAK], judicial authorities, law enforcement and security units) – For providing information to authorized persons and institutions and fulfilling audit and reporting obligations under Law No. 5549;

6- IT Companies (external service providers for information systems) – For the execution of information security processes, data backup, and operation of the website;

7- Representative Institutions – For the establishment of Everhub service agreements and verification of user information.

6.2. What is the Nature and Scope of International Sharing/Access?

The Company may share your personal data via the U.S.-based WhatsApp platform for the following purposes: conducting communication activities, ensuring customer satisfaction, responding more promptly to user requests, inquiries, and feedback, carrying out product/service sales processes, and executing office-related operations and procedures.

7. ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

Your personal data may primarily be processed based on the “explicit consent” condition, as stated in Article 5 of the Law.

Additionally, based on the following legal grounds mentioned in the same article,

- a) “Explicitly stipulated in the laws” – in order to fulfill obligations prescribed by the relevant legislation to which we are subject,
- b) “Establishment or performance of a contract” – in order to fulfill the obligations arising from the User Agreement to which you are a party
- c) Remote identity verification
- d) “Compliance with the data controller’s legal obligation” – in order to fulfill legal obligations under applicable legislation, such as responding to requests for information and documents from supervisory and reporting authorities such as MASAK, the Central Bank of the Republic of Türkiye (CBRT), and judicial authorities,
- e) "Publicly disclosed by the data subject",
- f) “Establishment, exercise, or protection of a legal right” – such as for evidentiary purposes in the event of a dispute, or for obtaining legal and technical consultancy services,
- g) “Legitimate interests of the data controller” – provided that fundamental rights and freedoms of the data subject are not harmed, such as promoting the use of Everhub’s services and enhancing brand recognition in the sector through collaboration with representative institutions.

In this context, we process your personal data pursuant to Article 5/a of Law No. 6698 within the framework of the following laws and other applicable legislation:

1. Law no 5549 on the Prevention of Laundering Proceeds of Crime
2. Turkish Commerical Code No. 6102
3. Law No.6563 on the Regulation of Electronic Commerce
4. Turkish Code of Obligations No.6098

5. Tax procedure law No.213
6. Law No.6473 on Value Added Tax
7. Law No. 6698 on the Protection of Personal Data, Article 5/f (Legitimate Interest)
8. Law No. 6698 on the Protection of Personal Data, Article 5/ç (Legal Obligation)
9. Decree Law No. 660 on the Organization and Duties of the Public Oversight, Accounting and Auditing Standards Authority
10. Regulation on Procedures and Principles Regarding Fees to be Charged from Financial Consumers.
11. Regulation on Measures Regarding the Prevention of Laundering Proceeds of Crime and the Financing of Terrorism

8. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

As personal data owners, you have the following rights as enumerated in Article 11 of the Law;

- To learn whether personal data is processed,
- To request information if personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request the rectification of incomplete or inaccurate personal data and to request that the transaction made within this scope be notified to third parties to whom personal data has been transferred,
- To request the erasure or destruction of personal data in case the reasons requiring their processing disappear, despite being processed in accordance with the provisions of the Law and other relevant laws, and to request that the transaction made within this scope be notified to third parties to whom personal data has been transferred,
- To object to the occurrence of a result against the person by analyzing the processed data exclusively through automatic systems,
- To demand the compensation of damages in case of damage due to unlawful processing of personal data.

9. HOW CAN YOU EXERCISE YOUR RIGHTS REGARDING PERSONAL DATA?

You can obtain information about your rights within the scope of Article 11 of the Law, which regulates the "**rights of the relevant person**," and the application process from our "**Personal Data Owner Application Procedure**" page, and you can apply to us using the "**Personal Data Owner Application Form**" located on the same page..