

**Magfi Dijital Medya Bilişim Teknolojileri Yazılım ve Reklamcılık Anonim Şirketi**  
**Website and Application Privacy Policy**

**Date of Update: 02-04-2025**

The Law on the Protection of Personal Data numbered 6698 (the “**Law**”) entered into force on 7 April 2016 and it contains regulations for the process of any kind of information relating to identified or identifiable real persons.

This policy contains the declarations and explanations of Magfi Dijital Medya Bilişim Teknolojileri Yazılım ve Reklamcılık Anonim Şirketi with its address in Eski Londra Asfaltı Caddesi Kuluçka Merkezi A1 Blok No:151/1C B34 Istanbul/Turkey (the “**Company**”), regarding processing of personal data belonging to real persons who access, benefit from the Services and/or fill out forms via the website with the domain name “<https://magfiads.com>” (the “**Website**”) and the application titled Magfi Ads (the “**Application**”) belonging to Company, within the context of the Law.

Within this framework, the scope of application for the policy is the process of personal data belonging to users who access to the Website and Application, to visitors who benefit from the Services and/or fill out forms via the Website, to Company’s customers or to employees of the Company’s customers.

Please, by carefully reading this privacy policy, review the provisions regarding your personal data processed by the Company via the Website. Pursuant to Law, your personal data may be processed by the Company as the data controller within the context explained below. For detailed information about cookies, you can review Cookie Policy and Cookie Privacy Policy in our Website.

The terms in this policy shall have the following meanings:

- Services** : Shall mean any kind of services provided by the Company via Website and/or Application following the users fill out the respective registration forms and register to Website or Application.
- User** : Shall mean the real persons who approve the “Membership and Utilization Agreement” or “Channel Owner Agreement” and “Advertising Publication Conditions” either on their own behalf or on behalf of the company where they work or are authorized therefor.

**User Account** : Shall mean the account designated by the Company in the Website or in the Application so that the Users can benefit from the Services either on their own behalf or on behalf of the company where they work or are authorized therefor.

**Visitor** : Shall mean the real persons who access the Website and/or fill out the contact form without benefiting from the Services.

**1. Data Subject, Data Categories and Data Types**

| <b>Group of Persons Whose Personal Data is Processed</b> | <b>Data Categories and Processed Personal Data</b>  | <b>Our Method of Collecting Personal Data</b>                      | <b>Legal Grounds</b>  |
|--|---|--|---|
| <b>Visitor</b>   | <b>Identity</b><br><i>(Name, surname)</i>   | Automatically through filling out the message form via the Website | Article 5/2 (f): legitimate interest  |
|  | <b>Contact</b><br><i>(E-mail address)</i>   | Automatically through filling out the message form via the Website | Article 5/2 (f): legitimate interest<br>Explicit Consent <i>(only for marketing activities)</i> |
|  | <b>Other Information</b><br><i>(Brand name and Website of the brand)</i>  | Automatically through filling out the message form via the Website | Article 5/2 (f): legitimate interest  |
|  | <b>Transaction Security</b><br><i>(Utilization and traffic data; device/tool data (such as IP address, operating system version, device type, system and performance)</i> | Automatically through visiting the Website                         | Article 5/2 (ç): legal responsibility<br>Article 5/2 (f): legitimate interest                   |

|             |  |  |   |
|-------------|--|--|---|
|             | <i>information, browser type))</i>   |  |   |
| <b>User</b> | <b>Identity</b><br><i>(Name, surname, TR Identity No, Tax ID No, date of birth, Telegram ID)</i>   | Automatically through open the User Account and filling out the necessary forms to benefit from the Services | Establishment or Performance of the Contract (Law Article 5/2-c)<br>In cases where data processing is necessary for the establishment, exercise or protection of a right (Law Article 5/2-e)<br>Legitimate Interest (Law Article 5/2-f) |
|             | <b>Contact</b><br><i>(E-mail, address, cell phone)</i>   | Automatically through open the User Account and filling out the necessary forms to benefit from the Services | Establishment or Performance of the Contract (Law Article 5/2-c)<br>In cases where data processing is necessary for the establishment, exercise or protection of a right (Law Article 5/2-e)<br>Legitimate Interest (Law Article 5/2-f) |
|             | <b>Transaction Security</b><br><i>(Utilization and traffic data; device/tool data (such as IP address, operating system version, device type, system and performance information, browser type))</i> | Automatically through logging in to the User Account   | Article 5/2 (ç): legal obligation<br>Article 5/2 (f): legitimate interest   |

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|  | <b>Financial Information</b> <sup>1</sup><br><i>(Bank, IBAN, transferred and spent balance information, utilized currency)</i>         | Automatically through filling out the necessary forms or directly to the Company                             | In cases where data processing is necessary for the establishment, exercise or protection of a right (Law Article 5/2-e) |
|  | <b>Professional Experience</b><br><i>(Title, company information in which the work is performed)</i>                                   | Automatically through open the User Account and filling out the necessary forms to benefit from the Services | Establishment or Performance of Contract (Law Article 5/2-c)<br>Legitimate Interest (Law Article 5/2-f)                  |
|  | <b>Other</b><br><i>(Information, requests, complaints provided to the Company while benefiting from the Services via User Account)</i> | Automatically by reaching out to Company in electronical methods while benefiting from the Services          | Establishment or Performance of Contract (Law Article 5/2-c)<br>Legitimate Interest (Law Article 5/2-f)                  |

## 2. The Purpose of Processing Personal Data

Your abovementioned personal data may be processed for the purposes listed below as a matter of your disclosure of such data to the Company, as indicated under article 4 of the Law for conditions and principles of being (a) lawful and in line with the principles of good faith, (b) accurate and up-to-date when necessary, (c) processed for specified, explicit and legitimate purposes, (ç) relevant, limited and proportionate to the purposes

<sup>1</sup> In case the person benefiting from the Services is a legal entity, Financial Information will not be considered within the scope of this policy.

for which they are processed, (d) stored for the period stipulated under the relevant legislation or as long as required to fulfill the purposes of the personal data is processed; and within the context of personal data processing conditions as stipulated under articles 5 and 6 of the Law.

In compliance with all such limitations, personal data belonging to Visitors and Users is processed in accordance with abovementioned general conditions and for the purposes below:

| <b>Visitor</b>                                    | <b>Purposes</b>   |
|---|---|
| <b>Identity</b>                                   | With the meeting request form filled out, to reach you, to organize the respective meeting, to receive any requests and to manage the marketing processes of products and services thereunder; afterwards, to store such for monitoring the respective requests as well as marketing procedures |
| <b>Contact</b>                                    |   |
| <b>Transaction Security</b>                       | Managing the Information Security Processes<br>Managing the Storage and Archive Activities<br>Generating and Tracking the Visitor Records<br>Informing the Authorized Persons, Institutions and Organizations ( <i>upon request</i> )   |
| <b>Other:</b> Brand name and Website of the brand | To manage the marketing processes of the services; afterwards, to store such information for the purpose of monitoring the respective requests and marketing procedures   |
| <b>User</b>                                       | <b>Purposes</b>   |
| <b>Identity</b>                                   | Managing the Communication Activities<br>Procuring Product and Service to You or to Your Company// Paying Invoices<br>Managing/Verifying the User Account<br>Managing the Contract Processes<br>Informing the Authorized Persons, Institutions and Organizations ( <i>upon request</i> )        |
| <b>Contact</b>                                    | Marketing the New Products and Services<br>Managing the Communication Activities<br>Procuring Product and Service to You or to Your Company   |

|   |  |
|---|--|
|   | Managing/Verifying the User Account<br>Issuing Invoices on Your Behalf/ Paying Invoices<br>Managing the Contract Processes<br>Informing the Authorized Persons, Institutions and Organizations ( <i>upon request</i> )   |
| <b>Transaction Security</b>   | Managing the Information Security Processes<br>Procuring the Electronical Safety of Company Operations<br>Informing the Authorized Persons, Institutions and Organizations ( <i>upon request</i> )<br>Managing the Storage and Archive Activities<br>Improving the Service Quality |
| <b>Financial Information<sup>2</sup></b>  | Monitoring and Performing the Payments<br>Issuing Invoices on Your Behalf/ Paying Invoices<br>Balance Tracking for Benefiting from the Services<br>Managing the Storage and Archive Activities   |
| <b>Professional Information</b>   | Managing the Communication Activities<br>Procuring Product and Service to You or to Your Company<br>Managing the Contract Processes  |
| <b>Other:</b> Information, requests, complaints provided to the Company while benefiting from the Services via User Account | Monitoring and Managing the Requests and Complaints<br>Improving the Service Quality   |

### 3. To Whom and For Which Purpose the Processed Personal Data May be Transferred

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<sup>2</sup> In case the person benefiting from the Services is a legal entity, Financial Information will not be considered within the scope of this policy.

The collected personal data may be transferred and processed in accordance and in limitation with the fulfilment of abovementioned purposes and in limitation with the personal data processing conditions under articles 8 and 9 of the Law as well as with the abovementioned purposes.

- i. All abovementioned personal data of our Visitors and Users are transferred abroad for the purposes of managing storage activities since the servers of the service provider, procuring the server service, are located abroad; and
- ii. Information of our Visitors and Users regarding identity, contact, title, company where they work as well as their requests and complaints and other personal information submitted to us via e-mail are transferred abroad for the purposes of managing communication activities and storage activities within the context of e-mail utilization.

Transfer abroad is performed through transfer to our suppliers (*third-parties procuring server and e-mail service*) as data processor pursuant to standard agreement signed under article 9/4-(c) of the Law within the context of legal reasons for data processing stated above.

Other than that, the identity, contact and financial information of our real person Users are transferred to our financial advisors and accountants residing in Turkey for the purposes of fulfilling our legal obligations and managing invoice and payments, within the context of legal reasons for data processing stated above.

On the other hand, in case authorized institutions and organizations so requests, transaction security and identity information of our Visitors and Users may be transferred to our lawyers and authorized institutions and organizations located in Turkey for the purposes of fulfilling our legal obligations. Further, identity, contact and financial information of our Users may be transferred to our financial advisors, accountants and lawyers and authorized public institutions (*courts and/or enforcement offices*) located in Turkey for the purposes of pursuing legal and enforcement processes.

Also, identity, contact and financial information of our Users may be transferred to our service providers, banks, payment institutions, e-invoice business partners, shipping and courier firms, private integrators and our business partners providing services of independent audit, financial advisor/accounting, for the purposes of managing invoicing processes, electronically sending e-invoice to client, delivering hard copy agreement or invoice, managing financial and accounting processes, determining and evaluating risks, preventing frauds, receiving or completing payments, managing and tracking your payment processes.

On an exceptional basis and with your explicit consent, the e-mail addresses of our Users may be transferred to our service providers and business partners for the purposes of managing advertising, marketing and promotion activities, providing personalized and advantageous offers and managing activities to improve your satisfaction by acquainting better with you.

Lastly, in case our Users are real persons, identity information and spent balance and similar financial information via Website may be transferred to respective third parties in connection with or during negotiations for any merger, sale of Company assets, financing or acquisition of our business activity, either wholly or partially, by another firm.

#### **4. Rights of Data Subject as Stipulated Under Article 11 of the Law**

As Data Subject, you can submit your requests within the context of article 11 of the Law regulating the rights of data subject, in accordance with “Communiqué on Principles and Procedures for the Request to Data Controller”, to e-mail address of info@magfi.co or to address of the Company in Eski Londra Asfaltı Caddesi Kuluçka Merkezi A1 Blok No:151/1C B34 Istanbul/Turkey and you can request the necessary amendments, updates and/or deletions and other related requests.