

PERSONAL DATA PROTECTION POLICY

TROY KIYMETLİ MADEN TİCARETİ A.Ş. - Troy Precious Metals Trading Co. ("Company"), we pay utmost attention to the matter of personal data protection and with this awareness, in accordance with Personal Data Protection Act, no 6698 (the "PDPA"), the Company regards proper management of the protection and processing of all personal data including individuals who benefit from our products and services as well as all persons related with the Company.

1. CAUSE ACTION FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

In order to conduct our business operations more smoothly, your personal data is being collected via various channels to fulfill the legislation and compliance with Company policies, based on legal grounds. Your personal data comply with foreseen fundamental principles, in the scope of personal data processing and purposes stated at 5. and 6. articles of PDPA, also can be processed and transmitted for the purposes stated in herein Enlightenment Text.

2. PURPOSES AND REASONS FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

- To use in all kind of product and services, including services provided as an agent and within our brokerage services we present in the scope of Regulation on Principles of Foundation of Precious Metals Brokerage Companies and as well as Precious Metals Exchange's Brokerage Companies' Activiy Principles.
- To record your personal data for indentifying your idenity, address and other background information which is needed realizing a transactions.
- To present our products and services in line with your needs.
- To forward important information through your contact details.
- To issue all necessary documents in order to complete your transactions on paper, verbally or electronically.
- To keep and report the information requested by the public institutions which we are obliged to give information such as SECRETARIAT of TREASURY of TURKEY, FCIB (Financial Crimes Investigation Board), CMB (Capital Market Board) and CBRT (Central Bank of Republic of Turkey) and to inform these institutions.
- To use for presenting our products and services under the sope of legislation but not in line with your purpose to be our client; to plan and put into practice activities for products/services/proposals which are speacial for you, to realize business model offers, data profiling, segmentation, scoring, for risk analysis, for customer relations management, to use in-house performace follow-up together with analysis studies, statistical studies, to make market research, In case we have your permission.
- Due to security practises, to record security footages in our branches, regional directorates and at our head office.

- To plan, control and put into practice our [corporate sustainability](#), corporate governance, strategic planning and information security processes.
- To fulfill our administrative and legal liabilities and to fulfill the requirements of contract that is signed between you and our company.

3. SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

In order to smoothly conduct our business operations or to fulfil our obligations to you, we may also disclose the personal data that you have provided to us, to the persons or institutions that permitted by provisions of the legislation, to public authorities, to our principal shareholder and subsidiaries and to domestic and foreign third parties that we are in business relation. All relations are secured with confidentiality agreements for the protection of the data. Your personal data also can be transmitted to our domestic and foreign service providers to conduct our business activities which are subject to the purposes determined in regulation and secured by confidentiality agreements.

4. PERSONAL DATA COLLECTION METHODS

Your personal data is collected via bilateral contacts signed with our clients, questionnaires, website, call center and via similar communication channels, by automatic or non-automatic ways, written and verbal channels. Your personal data is collected and processed in the scope of personal data processing conditions and purposes stated in the 5th and 6th articles of PDPA and in accordance with principles foreseen by PDPA.

5. RIGHTS

You have the right to waive, in whole or in part, any approval you have given in relation to the processing of your personal data. In addition you have the right to demand;

- To get information if your personal data is processed or not, In case your data has been processed you may get information regarding this subject, to learn which of your personal data has been processed, the purpose of processing and if your data has been used properly or not,
- To obtain information if your personal data has been disclosed to domestic or foreign third parties or not, in case the data has been disclosed to third parties, to learn mentioned persons and the categories of recipients.
- In case your personal data is wrong or imperfect, to ask for amendment or there is any changing you have the right to ask for update.
- In case disappearance of the reasons for processing data, to ask for deleting or wiping out your data and to ask for notifying this situation to third parties which the data are disclosed; without prejudice to the rights of the Company arising from the legislation and hereby this form.

It is important to note that; We reserve the rights to reject requests demanded unreasonable several times, required technical effort [disproportionately](#), putting other's confidentiality at risk or extremely difficult to realize.

You may send us your applications related with your rights mentioned above; by filling in Data Owner Application Form at our website www.troypm.com to the address troykiymetlimaden@hs03.kep.tr or you may send by post to our headquarter. Responsible person has the right to reject an application in case it is non-procedural or non-written.