

## CLARIFICATION TEXT ON THE PROTECTION OF PERSONAL DATA

As Troy Kıymetli Maden Tic. A.Ş. (Hereinafter referred to as “Troy”), we see respecting the personal rights of our clients, business partners and employees and ensuring the security of their personal data as one of our most important responsibilities.

In this regard, we meticulously carry out all our processes regarding the collection, processing, storing and transfer of personal data within the framework of Law No. 6698 on the Protection of Personal Data (hereinafter referred to as "KVKK") and relevant legal regulations.

Being aware of the increasing importance of the protection of personal data in a digitalizing world, Troy has structured its business processes accordingly and undertakes to maintain data security at the highest level. Our primary goal is to fully comply with the principles of “lawfulness and fairness”, “being accurate and kept up to date”, “being processed for specified, explicit and legitimate purposes”, “being relevant, limited and proportionate to the purposes for which they are processed” and “being stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed”, as set forth in Article 4 of the KVKK.

### 1- Data Controller

According to Article 3 of the KVKK, the data controller is defined as “the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system”.

As Troy, as the data controller within the scope of KVKK, we assume the responsibility of protecting and ensuring the security of personal data processed.

### 2- Purpose of Processing Your Personal Data

As Troy, we act in accordance with the conditions and purposes of processing personal data specified in Articles 5 and 6 of the KVKK. We process your personal data for the following purposes in line with legal bases;

- Identity verification and ensuring client security,
- Execution of financial and commercial transactions,
- Opening and managing client accounts and carrying out their instructions,
- Fulfilling legal obligations arising from relevant legislation,
- Fulfilling legal processes and requested audits,
- Ensuring client satisfaction and increasing service quality,
- Promoting products and services, marketing and meeting customer demands.

In accordance with Article 4 of the KVKK, all processed personal data are collected and processed for specified, explicit and legitimate purposes and are used relevantly, limitedly and proportionately to the purposes for which they are processed.

### 3- Transfer of Personal Data

In accordance with Articles 8 and 9 of the KVKK, personal data may be shared with third parties in accordance with the principles and rules specified in the relevant legislation and only for the purpose of meeting legal requirements.

All necessary technical and administrative measures are taken to ensure data security during the transfer of personal data, and in accordance with Article 12 of the KVKK, unlawful processing and access of data is prevented, and data is protected in a secure environment.

### 4- Data Collection Methods and Legal Reasons

#### 4.1. Data Collection Methods

- \* Directly through declaration
- \* Electronically
- \* Visual and audio recordings
- \* Automatic systems

#### 4.2. Legal Reasons for Processing Personal Data

Personal data is processed within the framework of the conditions specified in Articles 5 and 6 of the KVKK. In addition, regarding the activities of Precious Metal Brokerage Firms, it is processed in accordance with the provisions of Law No. 5549 on Prevention of Laundering Proceeds of Crime, the Tax Procedure Law and other relevant legislation.

### 5- Rights of the Personal Data Owner

In accordance with Article 11 of the KVKK, personal data owners can exercise their rights below by applying to the data controller. As Troy, we undertake to take all necessary administrative and technical measures to enable data owners to exercise these rights and to evaluate their applications in accordance with legal processes.

- The right to learn whether personal data is being processed,
- The right to request information if personal data has been processed,
- The right to learn the purpose of processing personal data and whether it is used in accordance with its purpose,
- The right to know the third parties to whom personal data is transferred, whether domestically or abroad,
- The right to request correction, if it has been processed incompletely or incorrectly,
- The right to request the erasure or destruction of personal data within the framework of Article 7 of the KVKK,
- The right to object to incomplete, incorrect or illegal data processing,
- The right to object to a result detrimental to the person that has been achieved by analyzing personal data through automated systems,
- The right to demand compensation in case of damages due to unlawful processing.

Personal data owners can make an application to exercise their rights with the documents below:

- \* Turkish Republic identity card for citizens of the Republic of Turkey, passport information if you are a foreigner,
- \* Residence document or address declaration,
- \* Power of attorney if the application is made by someone else on behalf of the data owner,
- \* If any, e-mail address, telephone and fax number,
- \* Additional documents depending on the subject of the request

Troy is the data controller. To apply by post, send your documents to the following address: Troy Kıymetli Maden Tic. A.Ş. İstanbul Dünya Ticaret Merkezi A3 Blok No:193 K:4 Yeşilköy – Bakırköy / İstanbul.

To apply by e-mail, send an e-mail to: [troykiymetlimaden@hs03.kep.tr](mailto:troykiymetlimaden@hs03.kep.tr)

Your applications will be evaluated and answered by Troy within 30 days at the latest in accordance with Article 13 of the KVKK.