



## GB ANNEX 2 – GMOPLUS GLOBAL PRIVACY AND DATA PROTECTION POLICY

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### 1. PURPOSE AND SCOPE

This **Privacy and Data Protection Policy** (“Policy”) regulates the collection, processing, storage, and protection of all personal and corporate data obtained in connection with the use of the **GMOPLUS Global Platform** (“GMOPLUS,” “we,” “our,” or “the Company”).

It applies to all users of the platform, including **member companies, experts, manufacturers, representatives, and visitors.**

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### 2. LEGAL BASIS

GMOPLUS processes personal data in accordance with applicable national and international data protection regulations, including but not limited to:

- **Law No. 6698 on the Protection of Personal Data (KVKK)** – Türkiye
  - **General Data Protection Regulation (GDPR)** – European Union
  - **Law on the Regulation of Electronic Commerce (Türkiye)**
  - **eIDAS Regulation and UNCITRAL Model Law on Electronic Commerce**
  - **Internal security and compliance standards of GMOPLUS Teknoloji A.Ş. and GMOPLUS GmbH**
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### 3. DATA COLLECTED

GMOPLUS may collect the following categories of data:

1. **Identification Data:** Name, surname, company name, tax number, commercial registration information.
2. **Contact Data:** Email address, phone number, country, and city.
3. **Account and Transaction Data:** Login history, quotations, orders, reservations, and communications through the platform.
4. **Financial Data:** Invoice details, IBAN, and payment information (processed only for transaction security).
5. **Technical Data:** IP address, device type, browser information, cookies, and system logs.

GMOPLUS does not collect unnecessary or excessive data and processes only what is required for service provision.

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### 4. PURPOSES OF DATA PROCESSING

The data collected is processed for the following purposes:

- To create and manage user accounts,
- To provide and operate trading, reservation, and consulting services,

- To verify identity and ensure secure communication,
  - To issue invoices and conduct financial transactions,
  - To deliver customer service and technical support,
  - To maintain platform security and prevent fraud,
  - To fulfill legal obligations and compliance requirements,
  - To improve user experience and generate analytical insights.
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## 5. DATA SHARING AND TRANSFER

GMOPLUS shares personal data with third parties **only when necessary** and in compliance with applicable data protection laws.

Possible data recipients include:

- GMOPLUS Teknoloji A.Ş. and GMOPLUS GmbH subsidiaries,
- Public authorities or courts (if legally required),
- Logistics, payment, or identity verification service providers,
- Legal, accounting, or audit partners (under confidentiality agreements).

All transfers are conducted **for specific purposes only** and via **secure transmission protocols (SSL, AES-256 encryption)**.

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## 6. INTERNATIONAL DATA TRANSFERS

- For data transfers outside the **European Economic Area (EEA)**, GMOPLUS applies **Standard Contractual Clauses (SCCs)** or obtains **explicit user consent**.
  - When transferring data between **Türkiye, Germany, and other countries**, GMOPLUS ensures an equivalent level of data protection.
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## 7. USER RIGHTS

In accordance with the GDPR, KVKK, and other applicable laws, users have the following rights:

1. To learn whether their personal data is being processed,
2. To be informed of the purpose and scope of data processing,
3. To know third parties to whom their data has been disclosed, domestically or abroad,
4. To request the correction of incomplete or inaccurate data,
5. To request deletion or anonymization of data under legal conditions,
6. To object to automated data processing or profiling,
7. To claim compensation for damages arising from unlawful data processing.

Requests should be submitted via email to [privacy@gmoplus.com](mailto:privacy@gmoplus.com).

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## 8. COOKIE POLICY

GMOPLUS uses cookies to enhance user experience and ensure service security. The platform employs the following categories of cookies:

- **Necessary cookies,**
- **Performance and analytics cookies,**
- **Preference cookies.**

Users may manage or disable cookies through their browser settings; however, doing so may limit some features of the platform.

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## 9. DATA RETENTION PERIOD

- Personal data is retained only for as long as necessary to fulfill its purpose, and in any case, no longer than **10 years**.
  - Upon termination of the contractual relationship, data is **anonymized or securely deleted**, unless legal retention obligations require otherwise.
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## 10. DATA SECURITY MEASURES

GMOPLUS implements robust technical and organizational measures to protect user data, including:

- SSL/TLS data encryption,
  - Strong access controls and multi-factor authentication,
  - Firewalls and regular penetration testing,
  - Periodic review of access rights,
  - Employee confidentiality training and awareness programs.
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## 11. POLICY UPDATES

This policy enters into force in **2025**.

GMOPLUS may update this policy when necessary.

Users will be notified of changes by email or through platform notifications.

If a user does not accept the revised version, they have the right to close their account.

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## 12. CONTACT AND ENFORCEMENT

For all privacy and data protection inquiries:

 [privacy@gmoplus.com](mailto:privacy@gmoplus.com)

 [www.gmoplus.com/privacy](http://www.gmoplus.com/privacy)

This policy forms an integral part of the **GMOPLUS Global General Terms of Use** and enters into force simultaneously with it.