



GB GMOPLUS GLOBAL DATA PROTECTION AND PRIVACY POLICY

Effective Date: 2025

Version: v1.0 – English

1. PURPOSE AND SCOPE

This policy has been prepared by **GMOPLUS Teknoloji A.Ş.** (Türkiye) and **GMOPLUS GmbH** (Germany) to ensure the protection of personal data and the privacy of users within the **GMOPLUS Global Platform (global.gmoplus.com)**.

It applies to all users, members, business partners, consultants, suppliers, and visitors who interact with or use GMOPLUS Global services.

2. LEGAL BASIS

This policy is based on:

- **Law No. 6698 on the Protection of Personal Data (KVKK)** of the Republic of Türkiye,
 - **General Data Protection Regulation (GDPR)** of the European Union,
 - and other applicable international data protection standards.
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3. DEFINITIONS

- **Personal Data:** Any information relating to an identified or identifiable natural person.
 - **Data Subject:** The individual whose personal data is processed.
 - **Data Controller:** GMOPLUS, which determines the purposes and means of processing personal data.
 - **Data Processor:** Any natural or legal person that processes personal data on behalf of GMOPLUS.
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4. COLLECTED DATA AND PURPOSES OF PROCESSING

GMOPLUS may collect and process the following categories of personal data:

- **Identity Information:** Name, surname, title, tax information, etc.
- **Contact Information:** Email, phone number, address.
- **Account Information:** Username, login history, IP address.
- **Financial Information:** Payment, billing, and banking details.
- **Commercial Information:** Orders, reservations, and transaction history.
- **Digital Information:** Cookies, device, location, and session data.

These data are processed for the following purposes:

- Membership registration and identity verification,
 - Management of orders, payments, and communications,
 - Improvement of service quality, platform security, and user experience,
 - Fulfillment of legal and contractual obligations,
 - Marketing, promotional, and analytical activities.
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5. DATA PROCESSING AND TRANSFER CONDITIONS

- Personal data are processed only in accordance with the law and stored **for the required duration**.
 - GМОPLUS may transfer personal data domestically or internationally **only for service-related purposes**.
 - Data transfers may occur to EU member states or to third countries deemed to have adequate data protection.
 - Prior to transfer, GМОPLUS obtains **explicit consent** from the data subject or ensures contractual safeguards.
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6. DATA SECURITY

GМОPLUS takes all necessary technical and organizational measures to ensure data security, including:

- Encryption, access control, logging, firewall, and SSL technology,
- Restricting access to authorized personnel only,
- Conducting regular audits and data breach risk analyses.

In the event of a data breach, affected individuals and relevant authorities will be promptly notified.

7. RIGHTS OF DATA SUBJECTS

Under KVKK and GDPR, data subjects have the right to:

- Learn whether their personal data is being processed,
- Request information regarding the purpose of processing,
- Learn about data transfers domestically or abroad,
- Request correction of incomplete or inaccurate data,
- Request deletion or destruction of unlawfully processed data,
- Object to processing or request compensation for damages caused by unlawful processing.

Requests may be sent via email to privacy@gmoplus.com.

8. COOKIE POLICY

GМОPLUS platforms use cookies to improve user experience, analyze site traffic, and optimize performance. Users can manage or disable cookie usage through their browser settings.

9. CONFIDENTIALITY COMMITMENT

GMOPLUS is committed to protecting the confidentiality of all user information.
Personal data will **never be sold, rented, or shared** with third parties without authorization.
Data are used exclusively for service-related purposes via secure system connections.

10. INTERNATIONAL DATA TRANSFER

Personal data may be processed or stored through GMOPLUS's operational centers located in **Ankara (Türkiye)** and **Munich (Germany)**.

International data transfers are carried out only:

- To GDPR-compliant countries,
 - On the basis of legal requirements, contractual necessity, or explicit consent.
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11. POLICY CHANGES AND EFFECTIVENESS

GMOPLUS reserves the right to update this policy due to legal, operational, or technological changes.
The updated version will become effective upon publication on the GMOPLUS platform.

12. CONTACT INFORMATION

For all inquiries, requests, or complaints regarding data protection, please contact:

-  **Email:** privacy@gmoplus.com
-  **Türkiye Office:** GMOPLUS Teknoloji A.Ş., Ankara, Türkiye
-  **Germany Office:** GMOPLUS GmbH, Munich, Germany