

## DATA PROTECTION STATEMENT FOR MEMBERSHIP ACTIVITIES

**Simmortals Technology International B.V.** (TIN: NL868347711B01) ("Simmortals" or "Company"), located at "Buitenplein 64, 1181 ZE Amstelveen", attaches great importance to the processing, retention and deletion of the general personal data collected from users who create a membership through our website [www.simmortals.com](http://www.simmortals.com) ("Website"), in accordance with Law No. 6698 on the Protection of Personal Data ("Law" or "PDPL"), the secondary legislation enacted under the Law, and the binding decisions of the Personal Data Protection Board.

In full awareness of this responsibility and in our capacity as the Data Controller, we process your personal data in the manner explained below and within the limits mandated by the applicable legislation, by taking all necessary technical and administrative measures to ensure an appropriate level of security in order to prevent unlawful processing of personal data, prevent unlawful access to personal data, and ensure the secure preservation of personal data.

### 1. Categories and Types of Personal Data

<b>Identification</b>	Name, surname, date of birth*.
<b>Contact Information</b>	Phone number*, e-mail address, country of residence*
<b>Visual and Audio Recordings</b>	Photograph*
<b>Transaction Safety and Risk Management</b>	IP address, application login–logout information, log records, and data processed for the purpose of preventing commercial, technical and administrative risks.

*The personal data marked with "\*" within the categories listed above are processed only if you upload/provide them under the "Edit Profile" section.*

### 2. Personal Data Collection Methods and the Activity Where Personal Data is Obtained

Category of Personal Data	The Activity Where Personal Data is Obtained
Identification, Contact, Visual and Audio Recordings, Transaction Safety and Risk Management	<b>By Semi-Automatic Method:</b> through creating a membership on the Website or by adding the relevant information via the Edit Profile section.

### 3. Purposes and Cause of Actions for Processing Personal Data

Category	Purposes of Personal Data Processing	Legal Basis
Identification & Contact	<ul style="list-style-type: none"> <li>• To carry out membership procedures,</li> <li>• To perform business and business continuity activities,</li> <li>• To follow up on orders, requests and complaints,</li> <li>• To execute the Company's operational processes,</li> <li>• To ensure the security of the data controller's operations.</li> </ul>	<b>Article 5/2-c-f of the Law;</b> if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, legitimate interests of data controller without violating fundamental rights and freedoms of data subject.
Visual and Audio Recordings	<ul style="list-style-type: none"> <li>• To personalize the user profile,</li> <li>• To customize the in-account appearance.</li> </ul>	<b>Article 5/1 of the Law;</b> Provided that your explicit consent is obtained.

<b>Transaction Safety &amp; Risk Management</b>	<ul style="list-style-type: none"> <li>• To ensure the security of the application,</li> <li>• To prevent any use of the application that is contrary to the membership agreement, legislation or public morals; to detect suspicious or unlawful activities; and to carry out blocking and unblock procedures.</li> </ul>	<b>Article 5/2-a-ç-f of the Law;</b> if it is expressly provided for by the laws, if it is necessary for compliance with a legal obligation to which the data controller is subject, legitimate interests of data controller without violating fundamental rights and freedoms of data subject.
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#### 4. Transfer of Personal Data and Purposes of the Transfer

Transfer Recipients	Purposes of the Transfer	Legal Basis
Authorized service providers acting as data processors	For the performance of business and business continuity activities; the management of relationships with support/external service providers, business partners or suppliers; and the execution of after-sales support/external services.	<b>Article 5/2-c of the law;</b> if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract
Legally authorized public institutions and organizations, judicial and administrative authorities.	Legal reporting, conducting regulatory and audit activities, handling complaints and legal processes.	<b>Article 8/2/a of the Law;</b> If it is mandatory for the data controller to fulfill its legal obligation.

#### 5. Rights of the Data Owners Under the Law

You may apply to Simmortals at any time and request to exercise your rights arising from the Art. 11 of the PDPL: "a) to learn whether your personal data has been processed, b) to demand for information if your personal data have been processed, c) to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose, ç) to know the third parties to whom your personal data are transferred in country or abroad, d) to request the rectification of the incomplete or inaccurate data e) to request the erasure or destruction of your personal data under the conditions referred to in Article 7, f) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom your personal data have been transferred, g) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems, ġ) to claim compensation for the damage arising from the unlawful processing of your personal data." You can submit your requests regarding your rights and the application of the Law by filling out the application form available at [www.simmortals.com](http://www.simmortals.com) or provided by us or by sending us a letter containing the minimum elements listed below.

- Send it with wet-ink signature to "BUITENPLEIN 64 1181 ZE AMSTELVEEN" via notary public, by registered mail with return receipt requested at your discretion for ease of proof or by your personal application,
- By sending an e-mail to [privacy@simmortals.com](mailto:privacy@simmortals.com) using the e-mail address you have notified to the Company and recorded in the Company's system.

As the personal data owner, in the application you will make to exercise your rights mentioned above and which contains the explanations regarding the right you have request to exercise; the requested matter needs to be clear and understandable, the subject needs to be related to yourself and in case you are acting on behalf of someone else, you will need to submit your special power of attorney certified by the notary in this regard.

In accordance with the "Commuqué on The Principles and Procedures for the Request to Data Controller", it is mandatory to include name-surname, signature, Turkish Identification ("ID") number (for foreigners, nationality, passport number or ID number if any), residential or workplace address for notice, e-mail address, telephone and fax number and the subject of the request in your applications. Applications that do not fulfill such elements will be rejected by Simmortals or directed to the valid application channels.

Simmortals reserves the right to make changes in this Data Protection Statement, due to the Law, secondary legislations and committee resolutions.

**This statement has been updated on 20.12.2025**