

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

During your activities on Gisted, an application that can be downloaded through Apple AppStore or Google PlayStore or similar application stores (“Gisted”), **J Meta Oyun Metaverse ve Teknoloji Anonim Şirketi (“Company”)** processes your personal data to

- Conduct and complete your membership process
- In case it is required for the service, to contact you.

In accordance with Article 10 of Personal Data Protection Law No. 6698 (“PDPL”) and other relevant legislation, this Privacy Notice aims to inform you on:

- Which of your personal data is collected,
- purpose of processing your personal data,
- to whom your personal data is transferred to,
- whether your personal data is transferred outside of Turkey,
- how your personal data is stored and safeguarded,
- whether your personal data is processed through automated methods,
- your rights regarding your personal data.

I. Processed Personal Data, Purpose of Processing and Legal Grounds

(a) Processing Based on Legal Grounds

Your personal data mentioned below are processed based on legal grounds specified on Article 5/2 of the PDPL.

The Company processes the personal data listed below for the purposes, through the departments and limited to the terms specified below.

Personal Data	Purpose of Processing and Legal Grounds	Data Processor	Retention Period
E-Mail Address	Completion of your membership to Gisted, performance of the services, contacting you regarding the services provided (in accordance with Article 5/2 of PDPL)	Operation Department	It is retained for 10 (ten) years following the end of the service.

The processing of this data is based on Article 5/2 (c) of the PDPL in accordance with the direct relation to establishment or performance of the contract and is not based on your explicit consent. In this regard, you cannot request your personal data to be deleted until the end of the retention period.

(b) Processing Based on Explicit Consent

Processing for Commercial Purposes

If you provide your explicit consent, based on your explicit consent the Company processes your personal data for:

- For creating a subscription to the bulletin
- promotion and development of the products and services,
- providing new products and services in line with customer satisfaction and needs,
- market research regarding the determination of suitable products and services,
- commercial contact for advertisement and marketing purposes, and
- for survey purposes

Personal Data	Purpose of Processing	Data Processor	Retention Period
E-Mail Address	For creating a subscription to the bulletin, development of services, providing new products in line with customer satisfaction and needs and for commercial communication.	Marketing Department	For 2 years upon end of the service period if you do not withdraw your explicit consent

Processing of this personal data for the purposes mentioned above is based on your explicit consent in line with Article 5/1 of the PDPL.

Your explicit consent for processing of your personal data for marketing and advertisement commercial communication is requested through Gisted. If you give your explicit consent, the Company will communicate with you through your e-mail.

You can always withdraw your explicit consent in line with Article 7 of the PDPL. You will not receive any bulletins and/or commercial communications from the Company if you withdraw your explicit consent. However, the withdrawal will not affect the legality of the processing prior to withdrawal.

Please be informed that even after you withdraw your explicit consent, especially for the personal data we may process without your explicit consent, we may continue to process your personal data to use and protect our own legal rights or to be able to perform our legal obligations, as required or permitted by applicable law.

Automatic Data Processing. Your personal data is processed through automated methods for statistical and market analysis purposes.

II. Collection Methods

The personal data mentioned above is processed by the department specified on “Data Processor” on the tables above, collected through Gisted, or through e-mails. Your personal data is stored on servers provided by third parties.

Retention Period

Your personal data is stored for the period specified on the tables above under “Retention Period”. The personal data is deleted or destroyed after the end of this period upon the first destruction period.

III. Transferring or Disclosing Personal Data to Third Parties

Transfer of personal data based on PDPL Article 8/2(a)

The Company may transfer and disclose your personal data without your consent in order to fulfill its statutory obligations and/or to perform its obligations under contract agreement, to comply with its legal duties and/or establish, use or protect its rights, to the following persons:

1. solely for the purpose of fulfilling its obligations, and limited and proportionate to the service obtained, in particular to technical support units within Company and to relevant departments, banks, audit firms, attorneys, law firms, financial consultants, as well as to third party suppliers necessary for its business and/or service provider third parties; and
2. law enforcement, judicial authorities, relevant ministries and directorates, and other public institutions authorized by law.

Data transfers within Turkey are limited to PDPL Article 5/2, paragraph (a) (by operation of law per PDPL Article 8/2 (a), paragraph (c) (entry into and/or performance of a contract), paragraph (ç) (compliance with a legal obligation) and paragraph (e) (establishment, use or protection of a right).

Information concerning third parties to whom your data is disclosed and/or third party categories within Turkey is always available for your review.

IV. Personal Data Transfer Abroad

Based on your explicit consent, the Company transfers your e-mail address information to Amazon AWS located in Frankfurt, Germany, which provides cloud and server services to the Company.


This transfer is based on your explicit consent in accordance with article 9/1 of the PDPL.

Additionally, Company workplace e-mails work through Google programs. In this case, all correspondence you carry out with the Company's workplace e-mails are stored in Google's servers abroad. The e-mail attachments you send in your e-mails that contain personal data shall be stored in secure locations.

V. Your Rights

As the data subject, you have the following rights under applicable law: (a) to learn whether and how your personal data is processed (Art. 11/a and b), (b) to learn the purpose of the processing and whether the data is used in accordance with its purpose (Art. 11/c), (c) to know the third parties to whom data is transferred (Art. 11/ç), (d) to request rectification (Art. 11/d), (e) to request the deletion of your personal data in case the reasons requiring processing have ceased to exist (Art. 7, Art. 11/e), (f) to request that third parties to whom your personal data has been transferred be notified of any relevant operations regarding rectification and deletion (Art. 11/f), (g) to object to the results obtained as a result of analysis (Art. 11/g), (h) to request the restriction of processing (Art. 7) and (i) to request the compensation in case of damage caused due to unlawful processing (Art. 11/ğ).

Your rights mentioned above are limited by law and will likely only be granted by us under certain conditions. (Please examine in particular Articles 10 and 13 of the PDPL.)

You can forward the requests listed above to the  e-mail address. The Company will conclude your request as soon as possible and no later than thirty (30) days after receipt of the request and the necessary documents.

Data Controller: J Meta Oyun Metaverse ve Teknoloji Anonim Şirketi

Mersis No: 0781092400800001

Address : Gülbahçe Mah., Gülbahçe Cad., Teknoloji Geliştirme Bölümü No: 1/18, İç Kapı No: 18, Urla, İzmir, Turkey

E-Mail Address: [●]

Upon your request, the Company can always update your personal data.

Right to Complain to the Personal Data Protection Board

You can use the following contact information to exercise your right to file a complaint with the Board pursuant to Articles 13, 14 and 15 of the PDPL:

Board: Personal Data Protection Board

Address: Nasuh Akar Mah. Ziyabey Cad. 1407. Sok. No: 4, Balgat, Çankaya, Ankara 06520, Turkey

Phone: +90 312 216 5000

Website: <http://www.kvkk.gov.tr>