VOLTRUN ENERJI A.Ş. PRIVACY NOTICE

This Privacy Notice has been prepared by Voltrun Enerji A.Ş. (hereinafter referred to as "VOLTRUN") as the data controller, in accordance with Article 10 of the Law No. 6698 on the Protection of Personal Data (“Law”) and the Communiqué on the Principles and Procedures to Be Followed in Fulfillment of the Obligation to Inform.

VOLTRUN takes necessary technical and administrative measures by utilizing its technological and infrastructural capabilities to ensure the secure storage and lawful processing of personal data in accordance with the Law and relevant regulations. Personal data are processed by VOLTRUN in compliance with applicable legal requirements. Individuals whose personal data are processed may review this

Notice to learn about the categories of personal data processed, the purposes of processing, third parties to whom the data may be transferred, collection methods, legal grounds, and their rights concerning personal data.

The scope, processing, and transfer of personal data described in this document may vary depending on the products, services, and applications used.

I. WHAT ARE YOUR PERSONAL DATA?

Personal data refers to any information that identifies or makes you identifiable. The categories of personal data processed by VOLTRUN include:

- **Identity Information:** National ID number, name, surname, passport number, tax ID, nationality, ID document

number, place and date of birth, marital status, gender, copy of ID document, photo, signature declaration/circular, and power of attorney.

- **Contact Information:** Phone number registered to the member, address, contact number, email address, social media accounts, instant messaging data.
- **Membership Information:** User and account number, RFID card, license plate, membership type, date, billing, transaction, discounts, payments, debts, usage, and status.
- **Transaction and Usage Information:** Charging data and related connection details including time, type, unit used, station and authorization method, unit location, power data, and usage data of products and services.

- **Sales and Customer Communication Information:** Data and documents provided during sales or customer communications, audio/visual records (e.g., video, photo), call center audio/text communications, chosen security words, and details of requests/transactions shared via these channels.
- **Product and Service Usage Information:** Preferences, habits, and usage related to products and services; behavioral data and cookies from VOLTRUN’s websites or those developed with third parties; device, network, app, location, and usage data from mobile apps.
- **Payment, Banking, and Risk Information:** Credit card, bank account,

debit card data stored on secure platforms, past payment performance.

- **Sensitive Personal Data:** Health data for groups eligible for social support (disabled, veterans), biometric voice recordings, and digital signatures.

II. PURPOSES, METHODS, AND LEGAL BASES FOR PROCESSING PERSONAL DATA

Your personal data is collected, either wholly or partially by automated means, during your use of the VOLTRUN mobile application—whether as a registered user or not—in relation to the products and services offered by VOLTRUN, when you visit our website, or when you contact us through our call center or other customer communication channels. This data is processed in

accordance with the legislation on the protection of personal data, for the purposes and legal grounds outlined below.

VOLTRUN, under all circumstances, processes your personal data in accordance with the general principles set out in Article 4 of the Law, in a lawful manner, for specific, explicit, and legitimate purposes, and in a way that is relevant, limited, and proportionate to those purposes.

In cases where it is explicitly stipulated by law:

- Verification of your identity information and documents when necessary; taking the necessary actions to detect and prevent abuse, loss, and fraud,
- Management and analysis of the charging network, carrying out billing

processes, and resolving disputes, especially consumer complaints and billing disagreements,

- Retention of information required to be stored under applicable legislation; duplication and backup of data to prevent loss of information; ensuring data consistency and taking the necessary technical and administrative measures to safeguard your data,
- Fulfillment of legal obligations required or mandated by regulatory and supervisory authorities, compliance with legal regulations, and conducting legal proceedings and enforcement actions,

your identity information, contact details, membership information, usage data, location data, information from sales and customer communication channels,

payment details, product and service usage data, as well as your banking and risk information, are processed.

In cases where the processing of personal data belonging to the parties of a contract is necessary, provided that it is directly related to the establishment or performance of a contract, and where data processing is required for VOLTRUN to fulfill its legal obligations:

- Provision, pricing, and invoicing of products and services; carrying out and tracking the operations you request related to the ordered, purchased, and/or used products and services, and execution of network management and roaming operations,

- Informing you about the benefits, conditions, pricing, membership, sweepstakes, competitions, and rewards related to products and services, and performing the necessary actions for their usage,
- Performing analysis and profiling based on requests from authorized public institutions and organizations,
- Verifying your identity information and documents when necessary; taking necessary actions to detect and prevent abuse, loss, and fraud,
- Resolving consumer complaints and disputes, and providing call center services,
- Improving, diversifying, measuring, auditing, and analyzing products, services, and networks; providing

employee training and conducting financial reporting activities,

- Retaining required information; backing up data to prevent information loss; ensuring data consistency; and taking necessary technical and administrative measures to protect our networks and your information,
- Conducting legal follow-ups and legal processes.

your identity information, contact details, membership information, usage data, location data, information from sales and customer communication channels, payment details, product and service usage data, as well as your banking and risk information, are processed.

In cases where personal data has been made public by the data subject, publicly available personal data is processed in line with the purpose of its disclosure for the following purposes:

- Development, diversification, measurement, auditing, and analysis of products, services, and networks; employee training; conducting financial reporting activities; assessing your interest in products and services; and conducting customer satisfaction research.

For these purposes, publicly disclosed identity information, contact details, membership data, location information, information from sales channels, product and service usage data, as well as payment, banking, and risk-related data are

processed in accordance with the original purpose of their disclosure.

In cases where data processing is necessary for the establishment, exercise, or protection of a legal right:

- Provision of products and services, execution of the operations you request related to the ordered, purchased, and/or used products and services, and management and tracking of complaint processes,
- Verification of your identity information and documents when necessary,
- Determination, management, and assessment of your debt follow-up processes and risk level, including assignment of receivables,

your identity information, contact details, membership information, information from sales and customer communication channels, product and service usage data, as well as your payment, banking, and risk-related information are processed.

In cases where data processing is necessary for VOLTRUN's legitimate interests, provided that it does not harm your fundamental rights and freedoms:

- Verifying your identity information and documents when necessary; checking and reporting your credit score; carrying out necessary actions to detect and prevent abuse, loss, and fraud; analyzing usage and location data,
- Developing, diversifying, measuring, auditing, and analyzing products,

services, and the charging network; providing employee training; conducting financial reporting activities; evaluating your interest in products and services; and conducting customer satisfaction research,

- Determining, managing, and assessing risk levels,
- Backing up data to prevent information loss; ensuring data consistency; and taking necessary technical and administrative measures to protect our networks and your information,
- Carrying out legal proceedings and legal follow-ups.

your identity information, contact details, membership information, information from sales and customer communication channels, product and service usage data,

as well as your payment, banking, and risk-related information are processed.

In cases where you have provided explicit consent:

Your identity information, contact details, membership information, location data, information from sales and customer communication channels, product and service usage data, payment, banking, and risk-related data are processed for the following purposes, provided that you have given your explicit consent specifically for them:

- Promotion and marketing of products and services, contacting you in relation to these, informing you about campaigns and discounts; enabling your participation in memberships, events,

and economic benefits, and carrying out the necessary actions for their use,

- Offering you deals, gifts, and promotions; conducting targeted marketing through analysis and profiling; sending personalized greetings, messages, awards, sweepstakes, and content you may have liked, might want to revisit, or would appreciate being reminded of,
- Promoting products and services provided jointly with our business partners, as well as their own products and services,
- If you apply for credit services or use mobile payment services within the scope of our offerings, providing these services and determining/managing/assessing your risk level.

III. TRANSFER OF PERSONAL DATA

Your personal data may be transferred, in accordance with the Law and for the purposes outlined in this Privacy Notice, to the following domestic and international recipients:

- VOLTRUN group companies and authorized individuals acting on behalf of Zebra Elektronik A.Ş., the parent company
- Suppliers, technical service providers, and business partners for product/service delivery
- Financial institutions, banks, partners for service delivery and promotion
- Authorized emergency responders

- Legal representatives, consultants, and service providers
- Your authorized agents (attorney, guardian, representative)
- Legally authorized institutions and their designees
- Telecom operators for billing and fraud risk management
- Financial institutions and security service providers during payment transactions via the mobile app

IV. YOUR RIGHTS REGARDING PERSONAL DATA

According to Article 11 of the Law, you may exercise the following rights by contacting VOLTRUN through the methods listed in the “Contact” section:

- Learn whether your personal data has been processed
- Request information if it has been processed
- Learn the purpose of processing and whether it is used appropriately
- Know the third parties to whom your data has been transferred
- Request correction if your data is incomplete or incorrect
- Request deletion or destruction under the conditions of Article 7
- Request that corrections or deletions be communicated to third parties
- Object to decisions made solely through automated systems
- Claim compensation if you suffer damage due to unlawful processing

V. CONTACT

You may submit your requests related to this Law and your personal data by completing the "Personal Data Application Form" available on your device and using one of the following methods:

- Email to *kisiselverilerikoruma@voltrun.com* from your registered and verified address in the system
- Mail or notary delivery to the following address, along with identity verification documents:
  Voltrun Enerji A.Ş. Headquarters, Nişantepe Mah. Saray Caddesi No:244, Çekmeköy/Istanbul

VOLTRUN reserves the right to request additional documents for identity verification in written applications.

VI. ABOUT THIS NOTICE

This Privacy Notice is effective as of the date it is published by VOLTRUN. VOLTRUN may update the content of this notice as needed. You are encouraged to periodically check our website for updates.