

PRIVACY POLICY

Effective Date: March 10, 2026

CROSSLINK TRADING İÇ VE DIŞ TİCARET LİMİTED ŞİRKETİ (hereinafter referred to as “we”, “us”, or “our”) places the highest importance on protecting the privacy and security of personal data of all individuals with whom we interact. This Privacy Policy has been developed in full compliance with the legislation of the Turkey, first and foremost with PERSONAL DATA PROTECTION LAW № 6698 dated 24/3/2016 hereinafter referred to as the “**PDPL**”), as well as with other applicable regulatory acts of the Republic of Türkiye.

We are committed to providing complete transparency regarding the manner in which we collect, process, store, use and transfer personal data. The present document is addressed to all categories of individuals whose data may come into our possession: visitors to our website <https://crosslinktradingltd.com/> representatives of corporate clients, business partners, service providers, job applicants, employees, as well as any other natural persons who directly or indirectly enter into contact with us or provide us with information about themselves — regardless of their country of residence, citizenship or location.

We act as the controller of personal data (Data Controller) with respect to the information that we process independently — meaning that we ourselves determine the purposes and means of such processing. Should you have any questions, comments or requests concerning this Policy or our data protection practices, please feel free to contact us using the details provided at the end of this document.

Scope of Application and General Principles

This Privacy Policy applies to any personal data that we obtain and process in the course of our activities — regardless of whether the information is collected through our website, electronic mail, telephone conversations, signed contracts, in-person meetings, feedback forms or any other communication channels, and irrespective of whether the data subject is located in the Turkey or in any other country.

. We are guided by the fundamental principles enshrined in the PDPL: lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, as well as accountability.

We do not process personal data in a volume exceeding what is genuinely necessary to achieve the declared purposes. Whenever the provision of certain information is mandatory for the performance of a service or the conclusion of a contract, we clearly communicate this at the moment of collection and explain the possible consequences of refusal to provide such data.

What Data We Collect and for What Purpose

Depending on the nature of your relationship with us and the method of interaction, we may receive a wide variety of categories of personal data. This may include your full name, email address, telephone number, postal address, date of birth, nationality, passport number, job title, name of the company you work for, banking details for invoicing and payment purposes, as well as any other information that you voluntarily share with us.

When interacting with international clients we may also collect and process information required for compliance with international trade regulations, sanctions screening, know-your-customer (KYC) and anti-money laundering (AML) requirements applicable in the Republic of Türkiye and/or in the jurisdictions relevant to a particular transaction.

In addition, when you visit our website we automatically collect certain technical information: your device's IP address, browser type and version, operating system, referral source, pages viewed, time spent on each page, and actions performed. These data are collected through cookies, tracking pixels and similar technologies.

In certain situations — for example, when concluding contracts, processing payments, reviewing CVs or complying with statutory obligations — we may request and process financial information, details of professional experience and education, and, in strictly limited cases (and only with your explicit consent or when directly required by law).

We never collect data merely “for future use”. Every type of information is requested and processed exclusively for the achievement of specific, previously defined and lawful purposes.

Legal Bases and Purposes of Processing

We are entitled to process your personal data only when there exists an appropriate legal basis as provided by the PDPL. Such bases may include:

- your freely given, specific, informed and unambiguous consent;
- the necessity of performing a contract to which you are a party, or of taking steps at your request prior to entering into a contract;
- compliance with legal obligations imposed upon us by the laws of the Republic of Türkiye;
- the pursuit of our legitimate interests (provided that they do not override your rights and freedoms);
- the protection of vital interests of you or of another natural person;
- the performance of a task carried out in the public interest.

In cases involving international business relationships, processing may also be necessary for compliance with mandatory legal requirements of the Republic of Türkiye (including international sanctions, export controls and trade compliance rules) as well as — where applicable and with an appropriate legal basis — for compliance with legal obligations applicable in the country of the client or in the jurisdiction where the service is performed.

The most common purposes of processing include: fulfilment of contractual obligations we have undertaken, maintenance of accounting and tax records, issuance and settlement of invoices, responding to your enquiries and requests, management of business correspondence, improvement of the quality of our services and website, conduct of marketing communications (subject to your consent where required), assurance of information security, prevention of fraud, and compliance with statutory requirements in the fields of anti-money laundering (AML), taxation, labour law and other regulated areas.

Should we wish in the future to use your data for purposes that materially differ from those for which the data were originally collected, we will notify you accordingly and, where necessary, seek additional consent.

Disclosure to Third Parties and Cross-Border Transfers

We may disclose your personal data to other parties only in strictly limited circumstances and subject to appropriate safeguards. Recipients may include:

- providers of IT services, hosting companies, payment processing entities, legal and audit firms that act solely on our instructions and under written agreements guaranteeing a level of protection no lower than that required by the PDPL;
- business partners — where services are provided jointly (subject to your consent if required by law);
- affiliated entities within our corporate group;
- public authorities and regulators in the Republic of Türkiye — when explicitly mandated by law;
- successors in the event of reorganisation, merger or business sale (with mandatory confidentiality obligations remaining in place).

We do not sell or rent your personal data. Any disclosure takes place solely to the extent necessary to achieve a specific purpose and only where a valid legal basis exists.

Whenever personal data are transferred outside the Republic of Türkiye, we ensure the existence of an adequate level of protection in accordance with Article 22 of the PDPL. This may be achieved through an adequacy decision, standard contractual clauses, binding corporate rules, explicit consent of the data subject, or other mechanisms permitted under Republic of Türkiye law and recognized as providing sufficient safeguards.

Security Measures and Data Retention

We implement state-of-the-art technical and organisational measures to protect your data against unauthorised access, loss, destruction, alteration or disclosure. These measures include encryption of data in transit and at rest, access control systems, regular software updates, security audits, staff training, and the development and testing of incident response plans.

In the event of a personal data breach that is likely to result in a high risk to the rights and freedoms of natural persons, we undertake to notify the Türkiye Data Office and, where required, you personally — within the time limits prescribed by law.

We retain personal data only for as long as is necessary to fulfil the purposes for which the data were collected, or for as long as required by the laws of the Republic of Türkiye or — in relation to international transactions — by the mandatory retention periods established under the laws of other relevant jurisdictions (for example, for customs, tax or sanctions compliance purposes). Upon expiry of the applicable retention period, data are securely deleted or irreversibly anonymised in such a way that they can no longer be associated with an identifiable individual.

Your Rights

The legislation of the Republic of Türkiye grants you a broad range of rights in relation to your personal data. You are entitled to:

- obtain confirmation as to whether we process your data and to request a copy thereof;
- require rectification of inaccurate or incomplete information;
- in certain circumstances demand erasure of your data (“right to be forgotten”);
- request restriction of processing while objections or complaints are being examined;
- receive your data in a structured, commonly used and machine-readable format and transmit those data to another controller;
- object to processing based on our legitimate interests or carried out for direct marketing purposes;
- withdraw previously given consent at any time (without affecting the lawfulness of processing carried out prior to withdrawal).

To exercise any of these rights it is sufficient to send us a written request. We handle such requests free of charge and respond within one month (which period may be extended in complex cases in accordance with the law).

If you are located outside the Republic of Türkiye, please note that the primary framework governing your rights is the PDPL. However, we will make reasonable efforts to consider and — to the extent compatible with Türkiye law — accommodate any additional rights you may enjoy under the data protection legislation of your country of residence.

If you believe that your rights have been infringed, you also have the right to lodge a complaint with the Türkiye Data Office.

Final Provisions

We may from time to time revise the text of this Privacy Policy in order to reflect changes in our data processing practices or in applicable legislation. The updated version is published on the website together with the new effective date.

This Privacy Policy is governed by the laws of the Republic of Türkiye.

Contact Information

For any matters related to the protection of personal data, please contact:

CROSSLINK TRADING İÇ VE DIŞ TİCARET LİMİTED ŞİRKETİ

info@crosslinktradingltd.com

We will be pleased to answer any questions you may have and to assist you in exercising your rights.