

METALSMARKET.NET

PERSONAL DATA PROCESSING PRIVACY NOTICE

ForInvest Yazılım ve Teknoloji Hizmetleri A.Ş. | www.metalsmarket.net

Scope: Subscriptions, free trials, LME market data, Networking and Chat.

1. Data Controller

Under Turkish Personal Data Protection Law No. 6698 (KVKK), the data controller is ForInvest Yazılım ve Teknoloji Hizmetleri A.Ş. (ForInvest). The Company operates www.metalsmarket.net (Platform), providing metals and commodities market data, analytics, subscriptions, free trials, Networking, Chat and related digital services. This Notice covers individual users and employees, officers and representatives of corporate subscribers.

2. Categories of Personal Data

Identity and user details: name, surname, username/user ID, professional title, licensing classification and permissions. Contact details: email, telephone, country, city and business address. Corporate information: company, industry, role and affiliation. Subscription information: data packages, start/end dates, trial history, applications/approvals, contractual acceptances, payment and billing records. Security information: IP address, sessions, device/browser information, login attempts and market data access logs. Where Networking/Chat is used: profile, connections, group/room memberships, messages and shared content. Support requests and correspondence may also be processed.

3. Purposes and Legal Grounds

KVKK Article 5(2)(c) (establishment or performance of contract): assess applications, administer accounts, entitlements, licences, market data and Networking/Chat services, payments and support. Article 5(2)(ç) (legal obligation): tax, accounting, legally required records, lawful official requests and data subject requests. Article 5(2)(e) (establishment, exercise or protection of rights): contractual claims, disputes, investigations and evidence. Article 5(2)(f) (legitimate interests subject to fundamental rights): cybersecurity, detection of unauthorized access, credential sharing, anomalous sessions and repeated free-trial applications, technical improvement and licence compliance. Activities requiring explicit consent will take place only with a separate valid consent. Marketing messages are subject to applicable electronic communications rules.

4. LME Licensing, Reporting and Audits

ForInvest distributes certain London Metal Exchange (LME) market data subject to the applicable LME Market Data Licence Agreement, policies, reporting and audit requirements. User/subscriber status, entitlements, market data package, user classification, IP address, sessions and data access records may be reviewed to verify compliance. Ordinary subscriber reports may be submitted to the LME. Where reasonably requested by the LME or its authorized auditors, necessary and legally disclosable identification, contact, corporate affiliation, subscription and access information may be shared for licence compliance, audits and investigation of misuse. This does not mean that names, emails or all access records are included in every monthly report. Disclosures remain subject to KVKK Articles 8 and 9. The LME contract alone does not authorize unlimited international personal data transfers.

5. Categories of Recipients

Where relevant and necessary: the LME, other market data licensors and their authorized auditors/representatives (reporting and audits); hosting, authentication, email, security and technical providers (service delivery); banks/payment institutions (payments and invoices); competent authorities (legal compliance and protection of rights). Depending on settings and access permissions, profile details and posts voluntarily shared in Networking/Chat may be visible to other authorized participants. Private messages are not treated as public profile information.

6. International Transfers

Transfers outside Türkiye may be necessary because the LME is based in the United Kingdom and certain technology providers operate internationally. Transfers may occur only when an applicable adequacy decision, appropriate safeguards or another valid mechanism and conditions under KVKK Article 9 are satisfied. Publication of this Notice alone does not provide an international transfer legal basis.

7. Collection Methods

Data is collected through website/mobile registration, subscription/free-trial applications, login and verification workflows, email, telephone, support, Platform access/security logs, Networking/Chat and corporate subscriber representatives, by automated, partially automated or legally permitted non-automated methods forming part of a filing system.

8. Retention and Security

Personal data is retained only for the period necessary for its purpose and applicable legal duties. Records needed for LME licence audits are retained in line with applicable contractual and policy requirements; this does not mean one retention period applies to all personal data. Data is deleted, destroyed or anonymized when retention grounds expire. ForInvest implements appropriate technical and organizational security measures.

9. Your Rights under KVKK Article 11

You may ask whether your data is processed and request information; learn the purpose and proper use; learn third-party recipients; request correction of inaccurate/incomplete data; request deletion/destruction where legally available and notification of changes to recipients; object to adverse decisions resulting solely from automated analysis; and seek compensation for unlawful processing.

10. Contact and Data Subject Requests

ForInvest Yazılım ve Teknoloji Hizmetleri A.Ş. | Website: <https://www.metalsmarket.net> | Data protection request email: [TO BE COMPLETED BY THE COMPANY] | Official correspondence address: [TO BE COMPLETED BY THE COMPANY]. Requests may be filed using procedures allowed by law and are answered within 30 days. A fee may apply only where permitted by the applicable tariff.

Last updated: October 31, 2026 | Contact details and actual international transfer mechanisms must be verified before publication.