

## **Finnova Recovery Plan - Customer Information Form**

Dear User,

As Finnova, acting as a crypto asset service provider, we adopt the fundamental principle of protecting investor safety at the highest level and conducting our operations within the regulations of the Capital Markets Board (SPK). Accordingly, in compliance with Article 99/B of the Capital Markets Law No. 6362 and Article 47 of the SPK's Communiqué on the Establishment and Operating Principles of Crypto Asset Service Providers (III-35/B.1) dated March 13, 2025, a Recovery Plan has been prepared within our company.

This informational document is prepared to provide detailed information on what procedures await you, how your assets will be protected, and how the process will be managed if the said recovery plan is activated.

### **What Does the Recovery Plan Mean?**

The recovery plan is an emergency response system activated to ensure the security of customer assets, maintain system continuity, and maintain transparent communication with the public in extraordinary situations such as security breaches, technical failures, system weaknesses, or external service interruptions. This plan includes operational procedures, technical backups, communication flows, regulatory compliance, and security steps directed at users.

### **When and How Is the Plan Implemented?**

The recovery plan may be activated under the following circumstances:

- External attacks on systems or wallet infrastructure,
- Detection of threats to assets in hot wallets,
- Interruptions or incompatibilities in critical external service providers,
- Uncontrolled deviations in crypto asset transfers,
- Inconsistencies in user balances,
- Inspections or warnings directly made by the SPK.

When these conditions occur, the plan is immediately implemented according to internal early warning systems and board decisions.

### **What Happens to Customer Assets?**

The security of customer assets is our primary priority within the scope of the recovery plan. The following steps are implemented without delay:

- Assets in hot wallets are isolated and transferred to cold wallets.
- All wallet addresses under threat are placed in a closed mode for transactions.
- User balances are verified by matching with blockchain-based analysis systems.
- No asset transfer is made without activating manual approval mechanisms.
- If necessary, all user assets are transferred to backup wallet structures.

Each step is simultaneously documented with system logs and external audit records.

### **How Are Account and Transaction Processes Affected?**

When the plan is activated:

- Withdrawal transactions may be temporarily suspended,
- Account accesses may be put into monitoring mode,

- Wallet balances may be shown as read-only,
- In-system warnings and directions are provided to users.

These measures are entirely temporary and will be reverted once system security is ensured.

### **SPK Notification and Audit Process**

Upon activation of the plan, Finnova immediately notifies the Capital Markets Board. Documents submitted to the Board include:

- Incident evaluation report,
- List of actions taken,
- Effects on the system and customer assets,
- Relevant sections of the recovery plan,
- External audit reports if necessary.

Additionally, an independent reserve proof audit must be conducted within 15 days from the activation of the recovery plan. The results of this audit are also shared with the Board.

### **What Happens if Operations Cannot Continue?**

If Finnova is unable to continue its operations:

- All customer assets are systematically transferred to secure wallets,
- Users are notified and instructed to withdraw their assets,
- Transfer processes are completed under security protocols,
- A technical support process is initiated to prevent user grievances.

### **How Can You Be Involved in the Process?**

In extraordinary situations, as a user, we recommend following these steps:

- Regularly check the announcements page at [www.finnova.com.tr/duyurular](http://www.finnova.com.tr/duyurular).
- Keep your email and phone information updated on the platform.
- Pay attention to in-system messages, SMS notifications, and social media announcements.
- Submit support requests only through our official support channels.

### **Contact Information**

Our communication channels to assist you during the recovery plan process are:

- [destek@finnova.com.tr](mailto:destek@finnova.com.tr)
- 0850 000 0000
- Live support: 24/7 service
- Official announcements: [www.finnova.com.tr/kurtarma-plani](http://www.finnova.com.tr/kurtarma-plani)

As Finnova, protecting user assets and being prepared for all kinds of crises is our priority. This information is part of our service approach based on transparency and trust.

Thank you.

Finnova Management