

# **Cash and Crypto Asset Transfer Policy**

## **1. Purpose and Scope**

This policy is prepared to ensure that crypto asset transfers conducted through the Finnova platform are managed securely, in compliance with regulatory requirements, and transparently. The policy covers customer transfers to external wallets or other platforms, transfers made to Finnova, and the security measures applied during these processes.

## **2. Transfer Process**

### **2.1. Transfers to External Wallets**

- The customer must accurately and completely specify the crypto asset they wish to send, the recipient wallet address, network selection, and transfer amount via the platform.
- All commissions and service fees payable by the customer are transparently displayed during the transfer process.
- The customer must provide recipient wallet information within the scope of Travel Rule requirements.
- 2FA (two-factor authentication) and email confirmation are mandatory for transfer approval.
- Once the transfer request is approved, it cannot be canceled.

### **2.2. Transfers to Finnova**

- The customer is responsible for selecting the correct wallet address and blockchain network when depositing crypto assets to the Finnova platform.
- Finnova is not responsible for lost funds due to incorrect network or wallet address selection.
- Transfers to Finnova are automatically subjected to AML scanning upon arrival in the Fireblocks wallet infrastructure.
- Transfers originating from risky addresses related to money laundering, illegal gambling, or terrorism financing are halted, reviewed by the compliance unit, and reported to MASAK if necessary.

## **3. Security and Compliance Measures**

### **3.1. Risk and AML Controls**

- Security of transferred crypto assets and wallet addresses is ensured through third-party integrations such as Sanction Scanner, Defy KYT (Know Your Transaction), and Fireblocks.
- If sender or recipient addresses are found risky, the transfer is blocked and the customer is notified.
- Large transactions and transfers meeting specific criteria may be subject to manual review.

### **3.2. Monitoring and Notification During Transfer Process**

- Customers can track the status of their transfers via the platform.
- A TXID (Transaction Summary) is generated and provided to the customer for successful transfers.
- Customers can learn the outcome of transfer transactions via email, SMS, or mobile notifications.
- Daily transfer activities are reported to authorized regulatory bodies.

## **4. Cash Transfer Policy**

### **4.1. Cash Transfers Are Prohibited**

- Finnova does not perform any transactions involving cash.
- Customers cannot deposit or withdraw cash through the platform.

### **4.2. Bank Transfer Principles**

- Transfers from Finnova can only be made to bank accounts registered in the customer's own name.
- Transfers to third-party bank accounts are strictly prohibited.
- All TRY (Turkish Lira) transfers are conducted exclusively through the Turkish banking system.

### **4.3. Security and Audit Process**

- Customers may only deposit TRY to Finnova accounts from a bank account registered in their own name.
- TRY transfers from another person's bank account are rejected and returned.
- Large money transfers may be reviewed with additional documentation requests in accordance with AML and Anti-Financial Crime policies.

## **5. Legal Compliance and Retention Periods**

- All transfer records are kept for 10 years as per Law No. 6102.
- Risky or suspicious transactions are reviewed by the compliance unit and reported to authorities if necessary.
- Updates in regulations affecting the transfer process are revised within the policy and communicated to customers.

## **6. Customer Obligations and Responsibilities**

- Customers must carry out transfer transactions carefully and select the correct wallet address and network.
- It may not be possible to recover assets sent incorrectly by the customer.
- Before the transfer, the customer is responsible for checking the commissions and fees specified on the platform.