

# PRIVACY POLICY

## Get Energy

Effective Date: 7 July 2026

Company: ŞARJAL TİCARET ŞİRKETİ LİMİTED

This Privacy Policy explains how Get Energy collects, uses, stores, discloses and protects personal data when a user accesses the Get Energy website, scans a QR code, uses a payment page, rents a portable power bank, contacts customer support or otherwise interacts with the service. The document is intended to be read together with the Terms of Service, Rental Policy, Pricing Rules, Refund Policy, Equipment Replacement Charge Policy, Payment and Automatic Charges Policy, Cookie Policy, Security Policy, Complaint Handling Policy and other legal documents published by Get Energy.

The service is designed as a web-first rental service. A user may start a basic rental through a QR code, station page or payment page without mandatory account registration. Where an account is available, it is an additional feature and not a general requirement for basic web rental unless verification is required for security, payment, fraud prevention, dispute handling or legal reasons.

Item	Information
Service name	Get Energy
Legal entity	ŞARJAL TİCARET ŞİRKETİ LİMİTED
Registration number	MŞ28752
Electronic company number	102944933544
Registered office	Beşparmaklar Cad. Nazım Bodi Plaza No:4 Çatalköy Girne, Turkish Republic of Northern Cyprus
Website	getenergy.energy
Contact email	info@getenergy.energy
Telephone	+90 548 854 6352

## 1. General Provisions

This Privacy Policy applies to all personal data processed in connection with the Get Energy service. The service allows users to rent portable power banks from automated stations and to return them to compatible Get Energy stations. The service may be accessed through a website, a QR code displayed on a station, a payment page, a mobile web interface, an application or other official interface provided by Get Energy.

Get Energy processes personal data only to the extent necessary to provide the rental service, process payments, maintain security, resolve customer requests, comply with applicable legal requirements and improve service reliability. The company aims to collect the minimum amount of personal data reasonably required for each service scenario.

By accessing the service, scanning a QR code, opening a payment page, starting a rental, confirming a payment, returning equipment or contacting customer support, the user acknowledges that personal data may be processed as described in this Privacy Policy.

## 2. Data Controller

The data controller responsible for the processing of personal data under this Privacy Policy is ŞARJAL TİCARET ŞİRKETİ LİMİTED, a company registered in the Turkish Republic of Northern Cyprus under registration number MŞ28752 and electronic company number 102944933544.

The company operates the Get Energy service under the commercial name Get Energy. The registered office is located at Beşparmaklar Cad. Nazım Bodi Plaza No:4 Çatalköy Girne, Turkish Republic of Northern Cyprus. Users may contact the company regarding privacy matters by email at [info@getenergy.energy](mailto:info@getenergy.energy).

For matters involving payment processing, certain payment data may be processed by banks, acquiring institutions, card networks, electronic wallet providers, payment service providers and fraud prevention providers acting as independent controllers or processors under their own legal obligations and technical standards.

## 3. Key Definitions

For the purposes of this Privacy Policy, the following terms have the meanings set out below. If a term is used in another Get Energy legal document, it should be interpreted consistently with the meaning given in that document unless the context clearly requires otherwise.

## 4. Web Rental Without Mandatory Registration

Get Energy may allow a user to rent a power bank through a web page, a QR code or a payment page without creating a permanent user account. In such a case, the user is treated as a guest user for the purpose of the rental. The absence of mandatory registration does not remove the need to process limited data required to start, bill, monitor and complete the rental.

For a guest rental, Get Energy may process the payment token or transaction reference, phone number or email if provided for receipts or support, rental start and end time, station identifier, equipment identifier, IP address, device and browser information, payment status, return confirmation and support correspondence.

An account may be offered as an optional feature for rental history, faster support, stored preferences, notifications or promotions. Get Energy may require additional verification only when it is necessary for security, payment recovery, fraud prevention, legal compliance, dispute handling, refund processing, protection of equipment or compliance with payment provider requirements.

## 5. Categories of Personal Data Processed

Depending on how the user interacts with the service, Get Energy may process the categories of personal data listed below. Not all categories apply to every user. Guest users generally provide fewer data points than registered account users.

## 6. Data Not Intentionally Collected

Get Energy does not request or intentionally collect full card numbers, card security codes, payment card PINs, online banking passwords, biometric identifiers stored on a user device, government identification documents unless specifically required for a lawful purpose, or sensitive categories of personal data that are not necessary for the rental service.

Users should not send sensitive personal information, card security codes, passwords, private keys, photographs of payment cards or identity documents to Get Energy through email, chat or any other support channel unless Get Energy has specifically requested a limited document for a lawful and necessary verification purpose.

## 7. How Personal Data Is Collected

Personal data may be collected directly from the user when the user opens a rental page, scans a QR code, enters a phone number or email address, confirms payment, communicates with support, requests a refund, submits a complaint or creates an account.

Personal data may also be collected automatically from the user device, browser, station, payment page or security systems. This includes IP address, browser type, device type, operating system, session identifiers, cookie identifiers, station identifiers, equipment identifiers, rental timestamps and security logs.

Get Energy may receive limited data from payment providers, banks, acquiring institutions, Apple Pay, Google Pay, card networks and fraud prevention systems, such as payment approval status, transaction reference, last four digits of a card where permitted, payment token status, authorization result, reversal or refund status and risk indicators.

## 8. Purposes of Processing

Get Energy processes personal data for purposes connected with the operation, security, billing and support of the rental service. The main purposes include enabling a rental, confirming payment, releasing equipment from a station, tracking the rental period, confirming return, calculating fees, processing automatic charges, handling refunds and protecting the company against loss, fraud, misuse and technical abuse.

Personal data is also processed to communicate with users, send receipts, provide service notifications, respond to support requests, investigate station errors, resolve payment disputes, manage equipment replacement charges, comply with accounting obligations, maintain service records, improve system reliability and protect the legal rights of Get Energy and its users.

## 9. Legal Bases for Processing

Where applicable privacy law requires a legal basis for processing, Get Energy relies on one or more of the following bases: performance of a contract with the user, steps taken at the request of the user before entering into a rental transaction, compliance with legal obligations, legitimate interests of the company and, where required, the user's consent.

The legitimate interests of Get Energy include operating a safe rental network, preventing fraud and misuse, protecting equipment, collecting amounts lawfully due for rental or replacement charges, investigating technical failures, securing the website and payment pages, improving customer support and defending legal claims.

Where processing is based on consent, the user may withdraw consent at any time through the relevant browser settings, device settings, cookie settings, account settings or by contacting Get Energy. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal and may affect the availability of optional features.

## 10. Rental Data and Equipment Data

When a rental is started, Get Energy records data necessary to operate the rental and protect the equipment. This may include the station where the rental started, the station where the equipment was returned, the time

of release, the time of return, the power bank identifier, rental status, tariff applied, payment references, authorization and charge events, error codes, support notes and station logs.

This data is necessary to determine whether a rental started correctly, whether the equipment was returned, whether the correct tariff was applied, whether a refund or correction is required and whether an equipment replacement charge may apply if the equipment is not returned or is returned damaged.

## **11. Payment Data**

Get Energy does not store full payment card details. Payment card data is processed by authorized payment providers, banks, acquiring institutions, card networks and wallet providers. Get Energy may receive and store limited payment-related data such as payment reference, transaction identifier, authorization status, charge status, refund status, token identifier, card brand, last four digits of the card where provided by the payment processor, expiry month and year where permitted, and risk or verification status.

Payments may be made using bank cards, Apple Pay, Google Pay or other payment methods made available by Get Energy. When Apple Pay or Google Pay is used, the user's wallet provider may process payment credentials under its own terms and privacy documentation. Get Energy receives only the data necessary to confirm and manage the transaction.

The service may use temporary blocking of funds, payment authorization, repeated attempts to collect amounts due, partial charges, refund operations, release of blocked amounts and other payment operations required to manage a rental. Automatic charges made during a rental are rental-related charges and do not constitute a subscription.

## **12. QR Codes, Camera and Station Pages**

The user may access the service by scanning a QR code placed on a Get Energy station or in an official Get Energy location. If the user scans a QR code through a device camera, the camera access is controlled by the browser, operating system or application used by the user. Get Energy uses the scan result to open the relevant station or rental page.

Get Energy does not use QR code scanning to access unrelated camera content. Camera access may be denied or disabled by the user. If camera access is denied, the user may be unable to scan the QR code directly but may still access the service through another official link or method if available.

Station pages may contain identifiers that connect the rental request with a specific station. This allows Get Energy to release the correct equipment, record the start of the rental and handle station-specific support issues.

## **13. Location Data**

If Get Energy offers station search, nearest station display or map functionality, the service may request access to the user's approximate or precise location. Location access is optional unless it is technically required for a specific feature selected by the user. The user can deny or disable location access in browser or device settings.

Location data may be used to show nearby stations, improve station availability information, assist with customer support, detect unusual rental behavior and improve service planning. Get Energy does not require continuous background location tracking for basic web rental unless a specific feature clearly requires it and the user has granted the relevant permission.

## **14. Cookies and Similar Technologies**

Get Energy may use cookies, local storage, session identifiers and similar technologies on its website, rental pages and payment-related pages. These technologies may be necessary to maintain a rental session, protect against fraud, remember cookie preferences, connect a payment attempt with a rental request, maintain security and improve user experience.

Non-essential cookies, such as analytics or marketing cookies, may be used where permitted by law and, where required, only after the user has given consent. Users can manage cookies through browser settings and, where available, through the cookie preference tools provided by Get Energy. More detailed information is provided in the Cookie Policy.

## **15. Communications, Receipts and Notifications**

Get Energy may use the user's email address, phone number or other contact details provided by the user to send receipts, rental confirmations, payment notifications, support responses, refund updates, equipment return reminders, important service notices and legal or security notifications.

Marketing messages, where used, will be sent only in accordance with applicable requirements. The user may opt out of marketing communications where an opt-out mechanism is provided. Operational messages connected with rentals, payments, security, support and legal matters may still be sent when necessary for the service.

## **16. Customer Support, Refunds and Complaints**

When a user contacts Get Energy, submits a refund request, reports a station error, claims that equipment was defective, disputes a charge or files a complaint, Get Energy may process information contained in the communication. This may include the user's name, contact details, payment reference, rental date, station location, equipment identifier, screenshots, photographs, support notes and correspondence history.

Support data is processed to identify the rental, investigate the issue, communicate with the user, process a correction or refund where appropriate, defend against improper claims, resolve payment disputes and improve the service.

## **17. Fraud Prevention and Security Processing**

Get Energy may process technical and transaction data to prevent fraud, misuse, unauthorized access, abuse of payment methods, QR code manipulation, station tampering, equipment theft, repeated failed payments, suspicious refund requests and other activity that could harm users, the company or payment systems.

Security processing may include monitoring IP addresses, device and browser signals, rental patterns, payment attempts, station activity, failed authorization attempts, unusual return behavior, repeated complaints, charge dispute patterns and system logs. Get Energy may restrict access, refuse a rental, request additional verification or block suspicious activity when necessary.

## **18. Sharing of Personal Data**

Get Energy may share personal data only where it is necessary for the operation of the service, compliance with law, protection of rights or performance of obligations. Data may be shared with hosting providers, technical infrastructure providers, payment processors, banks, acquiring institutions, fraud prevention providers, analytics providers, customer support tools, legal advisers, accountants, auditors and public authorities where legally required.

Service providers are expected to process data only for the purpose for which they were engaged and subject to appropriate confidentiality and security obligations. Some third parties, such as banks, card networks and wallet providers, may act as independent controllers under their own obligations.

## **19. International Data Transfers**

Get Energy may use cloud hosting, payment processing, communication, analytics and technical service providers located outside the Turkish Republic of Northern Cyprus. As a result, personal data may be transferred to or accessed from other countries.

Where data is transferred internationally, Get Energy will take reasonable steps to ensure that such transfers are protected by appropriate contractual, technical and organizational measures, taking into account the nature of the data, the provider involved and the purpose of the transfer.

## 20. Data Retention

Personal data is retained only for as long as reasonably necessary for the purposes for which it was collected, including service operation, payment records, accounting, dispute handling, security, legal compliance and protection of the company's rights. Retention periods may differ depending on the category of data and the legal or business need involved.

Get Energy may retain rental and payment records for the period necessary to resolve payment disputes, demonstrate completion or non-completion of a rental, comply with accounting requirements, investigate suspected fraud, respond to complaints and defend or establish legal claims. When data is no longer required, it will be deleted, anonymized or securely archived in accordance with applicable procedures.

## 21. Security Measures

Get Energy applies technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, disclosure or destruction. These measures may include encrypted connections, access controls, limited administrative access, logging, monitoring, password and credential protection, secure payment processing through payment providers, backups, vulnerability management and internal procedures.

No website, payment system, communication network or storage system can be guaranteed to be completely secure. Users should use secure devices, avoid sharing payment information or one-time codes, verify that they are using official Get Energy pages and contact Get Energy if they suspect unauthorized activity.

## 22. User Rights

Subject to applicable law and verification of identity where necessary, users may have the right to request access to their personal data, correction of inaccurate data, deletion of data, restriction of processing, objection to processing, receipt of a copy of certain data, withdrawal of consent and information about how their data is processed.

Privacy requests may be submitted by email to [info@getenergy.energy](mailto:info@getenergy.energy). Get Energy may request additional information reasonably necessary to identify the user and locate the relevant rental, payment or support record. Get Energy may refuse or limit a request where permitted by law, including where retention is required for legal, accounting, payment dispute, security, fraud prevention or equipment protection purposes.

## 23. Deletion of Guest Rental Records and Account Data

If a user has used the service without creating an account, Get Energy may not have a traditional account profile to delete. In such cases, Get Energy may still hold limited rental, payment, security and support records connected with the guest rental. The user may request deletion or limitation of such records, but Get Energy may retain information where necessary for legal, accounting, security, dispute or equipment-related purposes.

If a user has created an account, the user may request account deletion. Account deletion does not automatically remove records that must be retained for payment, tax, accounting, security, dispute resolution, equipment protection or legal compliance reasons. After deletion, Get Energy may keep limited archived records and may anonymize or separate data where practical.

## 24. Children and Minors

The Get Energy service is intended for users who have the legal capacity to enter into rental and payment obligations. The service is not directed at children. Minors may use the service only where permitted by applicable law and with the required consent or responsibility of a parent or legal guardian.

Get Energy does not knowingly collect personal data from children for purposes unrelated to the rental service. If a parent or guardian believes that a child has provided personal data without appropriate permission, they should contact Get Energy.

## 25. Automated Decision-Making

Get Energy may use automated rules to protect the service, manage payment attempts, detect suspicious activity, apply tariff rules, calculate rental duration, determine whether equipment has been returned and decide whether additional verification is required. These rules are necessary for the functioning of an automated rental service.

Where an automated result significantly affects a user, such as refusal of a rental, application of an equipment replacement charge or rejection of a refund request, the user may contact Get Energy and request review of the relevant matter through customer support or the complaint handling process.

## 26. Third-Party Websites and Services

The Get Energy website or payment flow may contain links to third-party pages, banks, wallet providers, payment interfaces, map services or other external services. This Privacy Policy applies only to processing by Get Energy and does not govern the practices of third-party services.

Users should review the privacy policies and terms of the relevant third-party providers, including payment providers, Apple Pay, Google Pay, banks and card networks, when using those services.

## 27. Changes to This Privacy Policy

Get Energy may update this Privacy Policy from time to time to reflect changes in the service, payment methods, legal requirements, security practices or operational needs. The updated version will be published on the official website or otherwise made available through the service.

Unless otherwise stated, changes take effect from the date of publication. If a change materially affects the way personal data is processed, Get Energy may take additional steps to notify users where required by applicable law.

## 28. Contact Information

Questions, privacy requests, complaints or requests relating to personal data should be sent to [info@getenergy.energy](mailto:info@getenergy.energy). Users should include enough information to identify the relevant rental, payment or support matter, such as rental date, station location, transaction reference, phone number or email used for the rental, if available.

Company: ŞARJAL TİCARET ŞİRKETİ LİMİTED. Registration number: MŞ28752. Electronic company number: 102944933544. Registered office: Beşparmaklar Cad. Nazım Bodi Plaza No:4 Çatalköy Girne, Turkish Republic of Northern Cyprus. Website: [getenergy.energy](http://getenergy.energy). Telephone: +90 548 854 6352.

## Schedule 1. Categories of Personal Data

The table below provides a practical overview of the categories of data that may be processed. The actual data processed in a specific case depends on the way the user uses the service.

Category	Examples	Typical purpose
Identity and contact data	Name if provided, phone number, email address, support contact details.	Receipts, support, refunds, complaints, account features and service notices.
Guest rental data	Rental session, station page, QR code entry, start and return events, rental references.	Enable rental without mandatory registration and connect payment to the rental.
Account data	Account credentials, preferences, rental history, saved contact details where offered.	Optional account functionality, faster support and history access.
Payment-related data	Transaction identifier, authorization status, refund status, last four card digits where provided, payment token reference.	Payment processing, billing, refunds, charge corrections and dispute handling.
Station and equipment data	Station identifier, equipment identifier, release event, return event, error codes, station logs.	Release and return of equipment, troubleshooting and protection against loss.
Technical data	IP address, browser, device type, operating system, session identifiers, cookies, security logs.	Service operation, security, fraud prevention, diagnostics and analytics.
Location data	Approximate or precise location where the user allows location access.	Nearby station search, service planning and support when necessary.
Support and complaint data	Messages, screenshots, photographs, notes, requested outcome, complaint history.	Customer support, refund assessment, complaint handling and legal protection.

## Schedule 2. Purposes and Legal Bases

Purpose	Data involved	Legal basis or justification
Starting and managing a rental	Guest rental data, payment status, station and equipment data.	Performance of a rental transaction and legitimate interest in operating the service.
Processing payment and automatic rental charges	Payment-related data, rental duration, tariff and return status.	Performance of contract, legitimate interest and payment provider requirements.
Confirming return or non-return of equipment	Station logs, equipment identifier, rental events and timestamps.	Performance of contract and legitimate interest in protecting equipment.
Customer support and refunds	Contact details, support messages, transaction reference and rental data.	Performance of contract, legitimate interest and legal obligations.
Security and fraud prevention	Technical data, logs, payment risk information and usage patterns.	Legitimate interest and legal obligations relating to payment security.
Legal, accounting and dispute records	Payment records, invoices, complaint records and correspondence.	Legal obligations and legitimate interest in establishing or defending claims.
Optional marketing and analytics	Cookie identifiers, usage data and contact details where permitted.	Consent where required and legitimate interest for non-invasive service analytics.

## Schedule 3. Retention Overview

Specific retention periods may vary depending on applicable legal requirements, payment provider rules, accounting obligations, disputes, security incidents and operational needs. The following table provides a general retention framework.

Data type	Indicative retention approach	Reason
Guest rental records	Retained for the period required to manage payments, refunds, disputes, accounting and equipment protection.	Rental proof, billing and support.
Payment transaction references	Retained according to accounting, payment dispute and banking requirements.	Financial records, refunds and dispute handling.

Security logs	Retained for a limited period unless needed for investigation or legal protection.	Security monitoring and fraud prevention.
Support and complaint records	Retained while the issue is active and for a reasonable period after closure.	Quality control, dispute handling and legal protection.
Account profile data	Retained while the account remains active and deleted or archived after account deletion subject to exceptions.	Account services and legal retention.
Cookie and analytics data	Retained according to cookie settings, analytics configuration and consent choices.	Website operation and service improvement.

#### Schedule 4. Recipients of Personal Data

Recipient category	Examples	Purpose of sharing
Payment providers and banks	Acquiring banks, card processors, Apple Pay, Google Pay and related providers.	Payment authorization, capture, refund, reversal, fraud checks and dispute handling.
Cloud and hosting providers	Website, database, server, backup and monitoring providers.	Hosting, operation and security of the service.
Technical service providers	Station management, messaging, analytics, support and security tools.	Service delivery, diagnostics, user support and security.
Professional advisers	Lawyers, accountants, auditors and tax advisers.	Legal compliance, accounting, audit and dispute management.
Public authorities	Courts, regulators, law enforcement or other authorities where legally required.	Compliance with lawful requests and protection of legal rights.

#### Schedule 5. User Requests

Users may contact Get Energy regarding privacy rights using the contact email stated in this Privacy Policy. To help Get Energy locate the relevant information, the user should provide the email address or phone number used for the rental, transaction reference, approximate rental date, station location and a clear description of the request.

Get Energy may need to verify the requester before disclosing, correcting or deleting data. This protects users against unauthorized access to their rental, payment or support records. If a request is unclear, excessive, legally restricted or impossible to fulfil without affecting payment, accounting, security or dispute obligations, Get Energy may ask for clarification or explain why the request cannot be fulfilled in full.

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