iMobile

MoneyCounter

Country Annex — Türkiye

Vendor statement of facts relevant to local requirements

Document ID	IM.MONEYCOUNTER.TR.A1
Document version	1.0
Date of issue	2026-10-06
Applies to	MoneyCounter 2.0.0.0
Language	English
Publisher	iMobile

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About this document

This annex supplements the documentation of MoneyCounter version 2.0.0.0 for customers in Türkiye. It sets out the facts about the product that matter under the local rules named below and shows which obligations stay with the customer.

The annex is a statement by the vendor about its product. It is not legal advice, not a certificate of conformity and not a substitute for the customer's own assessment.

1. Purpose and status

No certification or registration by Turkish authorities is claimed for the product or for the vendor in this document.

2. Product facts

Item	Fact
Product and version	MoneyCounter 2.0.0.0
Deployment	Desktop software installed on the customer's computers
Customer content on vendor servers	No
Interface languages	16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

2.1. Personal data the product can process

- The e-mail address entered to activate the Pro edition: kept on the computer in an encrypted file and sent to the vendor's account server. Not requested without activation.
- A machine fingerprint (SHA-256 hash of the Windows MachineGuid, the computer name and the system volume serial number): sent to the account server after activation and tied to the e-mail address in the signed terms string.
- Free-text comments to counts typed by the user: kept only in the local database.

2.2. Where data is stored

All data stays on the user's computer, in the Windows user profile: the database `%APPDATA%\MoneyCounter\moneycounter.ste` (SQLite: currencies, denominations, history of counts with logs), the activation file `%APPDATA%\MoneyCounter\license.dat`, and settings in the registry key `HKCU\Software\MoneyCounter` (language, selected currency, history column layout). No count data is stored on vendor servers.

2.3. Data sent to the vendor

- Activation code request: e-mail address, product identifier, interface language code (HTTPS, account server `accounts.new-imobile.com`)
- Activation: e-mail address, code from the e-mail, product identifier
- Edition check — right after activation and in the background on every start of an activated program: activation token, product identifier, machine fingerprint

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- Nothing else: no counts, history, telemetry or error reports are sent and there is no update check; a program that has not been activated opens no network connections

3. Data protection — KVKK

Law No. 6698 on the Protection of Personal Data (KVKK) applies to the personal data the customer processes with the product. The supervisory authority is the Personal Data Protection Board (Kişisel Verileri Koruma Kurulu).

3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the data controller (veri sorumlusu). The vendor has no access to that data and is not a data processor (veri işleyen) for it.

For the data listed under "Data sent to the vendor", which the vendor receives in order to perform the licence agreement, the vendor is itself a data controller (veri sorumlusu).

3.2. What the product provides (Article 12)

- **Access control.** The program has no sign-in, roles or access control of its own. Access to data is determined by the Windows account: each Windows user has a separate database and activation. The Pro edition is confirmed by an e-mail address and a one-time code sent to it.
- **Logging.** The program keeps no security event log, operation log or diagnostic files. Each saved count is stored with its log: lines about quantity changes, clearing and saving with the breakdown by denomination. The user can delete history records; deletions are not recorded.
- **Export and deletion.** Export: File → Back up… saves a copy of the database — a SQLite file readable with standard tools; there is no export to CSV, Excel or PDF and no printing. Deletion: a single history record with the M- button; all user data by deleting the folder `%APPDATA%\MoneyCounter` and the registry key `HKCU\Software\MoneyCounter` (uninstalling the program does not remove them). Activation data on the account server cannot be deleted from the program — contact iMobile for that.
- **Encryption.** See the section on cryptography below.

3.3. What remains with the customer

- the conditions for processing (Articles 5 and 6) and the obligation to inform data subjects (Article 10);
- registration in the data controllers' registry VERBİS where the customer is subject to it (Article 16);
- answering data-subject applications (Articles 11 and 13) with the export and deletion functions above;
- notifying a data breach to the Board within 72 hours;
- for installations on the customer's equipment, the choice of where that equipment is located.

4. Accessibility

Public bodies in Türkiye refer to WCAG when buying web-based systems.

Status of the product: No accessibility evaluation has been carried out; operation with screen readers and in high-contrast mode has not been tested. The display and some buttons are non-standard, custom-drawn controls. For Arabic and Persian the main window keeps a left-to-right layout.

No accessibility conformance report is provided for this version.

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5. Language

This package is supplied in English. Public tenders under Law No. 4734 are conducted in Turkish, and goods offered to consumers are accompanied by Turkish-language instructions (Law No. 6502). Turkish-language documentation is not part of this package.

Interface languages of the product: 16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

6. Documents usually requested and where to find them

Usually requested	Where it is
Product description, functional specification	Product Description and Functional Specification
Installation and operating instructions	Installation and Administration Guide
User manual	User Guide
Maintenance and support description	Software Lifecycle, Maintenance and Support. Service levels: contract
List of third-party and open-source components	Delivery Specification and Third-Party Components
Security and data-protection description	Security and Data Protection Statement
Data processing terms, standard contract for transfers abroad (KVKK)	Contract; needed only where the vendor processes customer data
Documentation in Turkish	Not part of this package
Licence agreement, warranties, prices	Contract

Document history

Document version	Date	Product version	Change
1.0	2026-10-06	2.0.0.0	First issue

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