

TAKSİM OTELCİLİK A.Ş.
PERSONAL DATA PROTECTION POLICY

I. PURPOSE

Taksim Otelcilik A.Ş. As "**Taksim Otelcilik**" or "**Our Company**"; protecting confidentiality and security of personal data of our customers, suppliers and business partners, our employees and other real persons establishing business relationships or visiting our internet site or establishing any other relationship with us is one of the most important things we care about.

In this context, Data Protection Policy ("Policy") has been prepared as part of the Personal Data Protection Law ("PDPL") numbered 6698 to clarify our rules and policies regarding personal data processing activities carried out by our Company and to provide clearness by informing data owners.

For information about rules and policies implemented by Taksim Otelcilik about use of cookies and similar technologies through Internet site and applications, read [Taksim Otelcilik Cookie Policy](#).

II. TERMS AND CONDITIONS ABOUT PROCESSING PERSONAL DATA

1. Description of "Personal Data"

In PDPL a.3 / I (d), "personal data" is defined as any information relating to specific or identifiable real persons. In this framework, anonymous data and data not associated with a particular person are not considered personal data under this Policy.

Personal data are divided into two groups; one is general data and the other is special data. According to Article 6 of PDPL, a real person's race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, dress and costume, association, foundation or union membership, health, sexual life, criminal conviction, data on security measures, biometric and genetic data are deemed as private personal data. In case of processing personal data, special rules determined in PDPL shall be applied.

2. General Principles on Processing Personal Data

According to PDPL Article 3 / I (e), "data processing" is any action that may be performed on personal data such as obtaining in a non-automatic manner being wholly or partly automatic or being part of any data recording system; storage, preservation, alteration, rearrangement, disclosure, transfer, acquisition, retrieval, classification or use of personal data.

As Taksim Otelcilik, we process personal data in accordance with the following principles within the scope of purposes set out under the heading "*Processing Objectives of Personal Data*" of this Policy:

- Processing in accordance with law and honesty rules,
- Accurate and up-to-date,
- Processing for specific, clear, and legitimate purposes,
- Connected, limited and specific to the purpose of processing
- To be stored for time required for the purpose of processing or as described in the relevant legislation

3. Data Processed by Taksim Otelcilik

Taksim Otelcilik can process general and personal data without explicit consent, provided that it is provided explicitly by the data owner or as projected in 5th and 6th articles of the PDPL.

Which data to be processed by Taksim Otelcilik for each data owner can vary depending on several factors such as type and nature of relationship between the data owner and Taksim Otelcilik and communication channels used. In this context, some of the general and special data processed by Taksim Otelcilik is shown below, but not limited to.

- name, surname, profession, title, information of institution / organization being worked, educational background, working history, gender, marital status, citizenship status, tax liability status, and if any, information about custodian, tutelar and deputy.
- Information contained in identification documents, such as ID, passport, driver's license,
- Address, telephone, e-mail, and fax number, contact information for home, place of work or temporary residence,
- Communication records such as electronic mail correspondence and other audio and video data,
- Internet protocol (IP) address, device ID, unique identifier information, device type, advertising ID, unique device icon, statistics about internet page views, incoming and outgoing traffic information, routing URL, internet log information, location information, visited sites and information on transactions and actions through our internet sites, our platforms, our internet network, and our advertising and electronic mail content.

4. Processing Purposes of Personal Data:

Taksim Otelcilik can process personal data for the following purposes and maintain them for the period required:

- To fulfill our company's legal obligations,

- Negotiation, establishment, and execution of contracts,
- Providing and developing the company's business and operational order,
- Creation and development of the company's human resources policies, provision of Company's employee needs and implementation and development of recruitment processes,
- Promotion and marketing of company services and products, identification of appropriate products, services, and platforms for customers, customizing and developing them for customers,
- Ensuring the security and control of the website and other electronic systems and physical media of the Company or used by the Company,
- Providing legal and commercial security of our company and those who are in business relationship with our Company,
- Investigation, detection, and prevention of contradictions to the contract and illegalities, and notifying authorities,
- Responding requests and inquiries and making notifications concerning the data owner,
- Resolution of legal disputes,
- Special day celebrations, organizing events, promotions, and campaigns such as gifts, discounts, including in raffles and contests that are beneficial for data owner,
- Taking opinion of data owner with questionnaires and votes,
- Establishing operations such as merger, division, share transfer and other partnership law acts,
- In case data processing is mandatory for the establishment, use or protection of a right,
- For protection of the legitimate interests of the Company, provided that it does not damage the fundamental rights and freedoms of data owner.

5. Domestic and Abroad Individuals and Organizations to whom Personal Data Can be Transferred

Taksim Otelcilik may transfer personal data to third parties both in the country and abroad and may store them on servers or other electronic media in the country and abroad in accordance with the general principles set forth in the 4th article of the PDPL and taking necessary security measures requirements stipulated in Articles 8 and 9, for the purposes set out under the heading "*Processing Purposes of Personal Data*" of hereby policy document. Third parties to which personal data may be transferred are generally as follows, while the

relationship between data owner and Taksim Otelcilik may vary depending on several factors such as type, quality, and place of the transaction:

- General law enforcement and other authorized institutions and organizations permitted to transfer information in accordance with legislation,
- Our group companies,
- Our company's domestic and foreign business partners, suppliers, and subcontractors,
- Other third parties upon your request or application.

As Taksim Otelcilik, we can store your personal data on servers located in Turkey or abroad, or and other electronic media provided that necessary security measures are taken.

Our company does not share any personal data it has obtained with anyone else for the promotion and marketing of third parties without the explicit and specific permission of data owner.

6. Method of Collecting Your Personal Data and Legal Reason:

Taksim Otelcilik can collect personal data in written, verbal, audio or video recording or other physical or electronic forms for the purposes determined under “Processing Purposes of Personal Data” of hereby policy and policies determined in Article 4 of PDPL and under conditions specified in Article 5, 6, 7, 8. While the relationship between data owner and Taksim Otelcilik may vary depending on various factors such as type, quality and place of the transaction, methods used for collecting data are as follows:

- Through our company's own and other physical media, internet site and similar electronic media, through oral, written, and electronic notices made to our Company or contacts made with the aforementioned media;
- Through our group companies,
- Through third parties, such as agencies, tour operators, job search platforms, where our Company is serviced or has business partnership.

7. Retention Period of Personal Data and Destruction

Taksim Hospitality stores personal data for as long as it is necessary and destroys it when the storage period ends according to Article 7 “Regulation on Deletion, Destruction or Anonymization of Personal Data” of PDPL.

8. Security and Control of Personal Data

Within the framework of Article 12 of PDPL, Taksim Otelcilik considers that necessary technical and administrative measures are taken in order to prevent personal data from being

processed illegally and to be illegally accessed, and to provide safekeeping thereof. In this context, measures taken by Taksim Otelcilik are listed below:

- Preparation of internal policies and rules to ensure that the company's business processes and activities are carried out in accordance with the legislation on personal data protection; within this context, informing the company employees about relevant legislation and internal policies and regulations and arrangement of trainings,
- Establishment and implementation of necessary organizational and information security measures to ensure the security of personal data both inside and outside the company, and to prevent unauthorized access to data,
- Internal policy and rules compliance for the protection of personal data are audited at specified intervals, and the results of this audit are regularly reported to the management board,
- Taking declarations and commitments from employees and data processing institutions on behalf of the Company, necessary for protection and confidentiality of the data,

Adequacy of the measures taken by Taksim Otelcilik to ensure the safety of personal data is subject to periodic checks; and it is aimed to continuously improve the existing data security system according to needs and possibilities.

9. Rights of Data Owner

According to PPDL article 11, personal data owners have rights to learn whether their personal data is processed, request their personal data if it has been processed, to learn how their personal data is processed and whether it is being used appropriately for its purpose, knowing the third parties to whom their personal data are transferred in or out of the country, asking to correct their personal data if they are missing or incorrectly processed, request their personal data to be deleted or destroyed in case the reasons for processing them end, ask to delete or destroy them, request correction and deletion to be reported to the third party to whom their personal data is transferred, object to emergence of a consequence of analysis of processed data exclusively through automated systems, claim that their personal data has been processed in violation of the law and that you have been harmed.

As a data owner, if you not wish to use any of the rights set forth in Article 11 of the PDPL, you must complete Personal Data Owner Request Form; and **(i)** you must send a wet signed copy of this form to 19 Mayıs Caddesi. Golden Plaza İş Merkezi No:3 K:3 Şişli/İstanbul address in person or by notary public or **(ii)** send this form to kisiselverigizlili@taksimotelcilik.com.tr electronic mail address with secure digital signatures.

In the event that Board of Protection of Personal Data decides to transmit the requests through methods other than those specified above, Company will be notified separately in which forms data owners may transmit their applications.

Taksim Otelcilik will conclude the request of data owners within thirty days at the latest according to the specification of the claim in accordance with Article 13 of the PDPL. As a rule, requests of data owners will be fulfilled free of charge, but if responding their request requires additional costs, fees may be charged for the amounts set forth in the applicable legislation.

III. CHANGES IN THE POLICY

As Taksim Otelcilik, it is possible for us to make changes in this policy at various times. The current version of the Policy prepared by our Company is available on our Company website; and the changes that can be made to the Policy can be followed on this website too.