

CESEKA TOURISM AND DORMITORY SERVICES TRADE.LTD.CO.

THE HALICH HOTELS

DISCLOSURE NOTICE ON THE PROCESSING OF PERSONAL DATA

Dear Guest

This disclosure notice prepared within the scope of the protection of personal data is a general disclosure notice within the framework of the Personal Data Protection Law No. 6698, which is applied throughout our company and hotel, whose company title and hotel name are given below.

Our company and hotel;

CESEKA TURİZM VE YURT HİZMETLERİ TİC.LTD.ŞTİ. (The Halich Hotels; The Halich Hotel Istanbul Karaköy and Csk The Halich Port Istanbul);

Hereinafter, the hotel and our company, "The Halich Hotel Istanbul Karaköy and Csk The Halich Port Istanbul" will be referred to as "Hotel".

As The Halich Hotels family, we attach great importance to the protection of your personal data. In this context, we process your personal data as "Data Controller" in accordance with the Personal Data Protection Law No. 6698 ("KVKK"), within the scope of the purposes and limits specified below, and we pay utmost attention to take the necessary administrative and technical measures accordingly. For this reason, we would like to inform you about our processes of processing your personal data through this "Clarification Notice on the Processing of Personal Data" and your rights arising from the Law No. 6698 and GDPR regulation of our esteemed guests and visitors within the framework of the KVK law.

1. Your Personal Data We Process

We will need to ask for information about you and/or your family members who are customers of The Halich Hotels, such as

- Identity information (e.g. name, surname, Turkish ID number, Passport Number).
- Contact information (e.g. telephone number, e-mail address, Your Contact Address).
- Personal information (e.g. date of birth, nationality).
- Information about your children (e.g. name, date of birth, age).
- Your credit card number (for bank collection and booking purposes).

- Your arrival and departure dates.
- Your preferences and interests (e.g. smoking/non-smoking room, preferred floor, type of bedding, type of newspaper/magazine, sports, cultural interests)
- Your questions/comments during or after your stay in our organization.
- Sensitive health data that we are obliged to process in order to provide you with better service, to protect your health and to enable you to use our sports complexes (e.g. blood type, previous diseases, allergen conditions, whether you have a disease that will prevent sports activities, etc.). Information collected about persons under the age of 18 is limited to name, nationality and date of birth, and this information can only be given to us by an adult. (All of the data listed above in the text will be referred to as "Personal Data" together.)

2. Time of Obtaining Your Personal Data

Personal data may be collected in various situations, including the following:

1. Hotel activities:

- Room reservation.
- Hotel check-in and payment.
- Arrival and departure dates.
- Eating/drinking in the hotel bar or restaurant during a stay.
- Requests, complaints and/or disputes.
- Your reservations (for weddings, meetings and other organizations).
- Suggestion and survey forms.

Within the framework of the Law No. 6698 on the Protection of Personal Data, the processing of personal data refers to all kinds of operations performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making it available, classifying or preventing its use by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.

- - Participation in marketing programs or events:
- - Participation in customer surveys (e.g. Guest Satisfaction Survey)
- - Subscribing to newsletters to receive offers and promotions via email.

- - Transmission of information from third parties:
- - Information transmitted to our properties through reservations you make through tour operators, travel agencies, GDS reservation systems and others.
- - Internet activities:
- - Connection to The Halich Hotels websites (IP addresses, cookies)
- - Online forms (online booking, surveys, network login systems such as The Halich Hotels pages on social networks, Facebook login, etc.).

Method and Legal Reason for Processing Your Personal Data

Your Personal Data may be collected and processed by the relevant departments of the Hotel and other authorized departments by automatic or non-automatic methods within the framework of the purposes specified in Article 3 of my Declaration within the scope of the fulfillment of the requirements of the service processes offered within the accommodation and hotel facilities in our Hotel, in order to carry out accommodation and other service processes and / or to fulfill all obligations, including the legal obligations of the Hotel, by the following methods and means:

- In person in your applications, by hand, through the Hotel's websites, electronic mail, postal mail, through references or through the solution partners and suppliers that the Hotel works with (e.g. travel agencies, tour companies, reservation sites) and/or websites, social media accounts.

- With the information obtained during interviews that can be conducted in different ways (face-to-face, telephone, teleconference, video conference, fax, etc.). Your personal data; It is processed for the following legal reasons in Article 5 of Law No. 6698;

- Explicit consent,
- Explicitly stipulated in the law,
- III. If you are unable to disclose your consent due to actual impossibility or it is mandatory for the protection of your life or physical integrity or that of another person whose consent is not legally valid,
- Processing personal data in connection with the conclusion or performance of a contract,
- It is mandatory for the fulfillment of our legal obligations,

- It has been made public by the person concerned,
- VII. Data processing is mandatory for the establishment, exercise or protection of a right
- VIII. It is necessary for our legitimate interests, provided that it does not harm your fundamental rights and freedoms and your explicit consent is obtained,
- Your Special Health Data is processed based on your explicit consent or in case the conditions listed in Article 6 of the Law are met. Your personal data is processed in accordance with the Identity Notification Law No. 1774, Tax Procedure Law, Turkish Commercial Code No. 6102, Personal Data Protection Law No. 6698 and other relevant legal regulations. The Halich Hotels acts in accordance with the data processing principles and obligations specified in the Constitution of the Republic of Turkey, international conventions to which our country is a party, EU data protection legislation (GDPR) and the relevant legal legislation, especially KVKK, in the processing of your Personal Data.

3. Processing of Your Sensitive Personal Data

Article 6 of the Law No. 6698 on the Protection of Personal Data defines certain personal data as "special categories" which, when processed unlawfully, may cause victimization or discrimination. These data are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association - foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data. Our hotel acts in accordance with the regulations stipulated in Article 6 of the Personal Data Protection Law in terms of processing special categories of personal data and acts sensitively in the protection of these data.

As The Halich Hotels family, we process your sensitive personal data in accordance with the Personal Data Protection Law, provided that adequate measures to be determined by the PDP Board are taken in the following cases

1. In the case of your explicit Consent

You can request customized service by sharing your conditions with our Hotel and share your sensitive data for this purpose. (For example, requesting a thin pillow due to neck hernia, requesting a room on the ground floor due to heart disease, requesting us to prepare dessert without nuts due to peanut allergy, serving gluten-free meals due to gluten allergy, and your health information that you provide about whether you have a condition that will prevent you from benefiting from the relevant sports activity services in order to decide whether you meet the health conditions required to benefit from the services offered at the facility, etc.).

This health information received with your explicit consent within our hotel is restricted even within the institution so that only those responsible for it can see it within the facility where you receive service. In order for us to provide customized services for your needs that you have defined by sharing your special quality data and to provide the same services again by remembering your needs in the future, our Hotel will process your special quality data only with your explicit consent and only to serve the purpose of collection. Your special quality health data and your special quality data related to your other preferences are shared within the organization only with our personnel who will provide the service in a limited manner in order to provide in-house service and to minimize the factors that will pose a life risk to our valued guests in line with the service you receive. This private data is never shared with our other in-house employees or 3rd parties. In order to protect this sensitive data, all necessary administrative and technical measures are taken and care is taken to protect the data with seriousness and sensitivity.

2. In the Absence of Your Explicit Consent

Your sensitive personal data other than your sensitive health data can only be processed in cases stipulated by law. Your sensitive personal data related to your health is processed only by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing. Apart from this, your health data can only be shared with health institutions in cases where your explicit consent will not be obtained (if you have an accident, if you are too ill to declare your explicit consent, in cases requiring emergency medical intervention).

4. Purposes of Processing Your Personal Data

Your personal data are processed for the purposes detailed below in order to establish the security of our Hotel and to benefit from the services offered by our Hotel to our visitors and guests, to manage the access records of our Hotel, to fulfill our obligations arising from the law and legislation, to fulfill the personal data processing conditions specified in Articles 5 and 6 of Law No. 6698 and to fulfill the obligations of our organization determined by law.

1. To fulfill our obligations to our customers.
2. To manage room reservations and accommodation requests:
 - To create legal documents in accordance with accounting standards, To manage and store billing services.

Managing your hotel stay:

- Monitoring your use of services (phone, bar, pay TV, etc.)
- Managing access to rooms.
- Internal management of lists of customers who behaved inappropriately during their stay at the hotel (aggressive and antisocial behavior, non-compliance with the hotel contract, non-compliance with security arrangements, theft, damage or payment-related incidents).
- Carrying out marketing activities, promoting our brands.
- Adapt and improve our products and services to better meet your needs.
- Customize the commercial offers and promotional messages we send you.
- Inform you about special offers and new services created by The Halich Hotels and its affiliates where we have your explicit consent.
- Managing our relationships with customers before, during and after their stay.
- Perform segmentation based on booking history and customers' travel preferences in order to send targeted communications.
- Develop and report statistics and commercial scores.
- Know the preferences of new or old customers and provide personalized service.
- To send you newsletters, promotions and tourism, hotel or service offers or contact you by phone where we have your explicit consent.
- Manage requests to unsubscribe from newsletters, promotions, tourism offers and satisfaction surveys.
- Take into account the right to object and manage the objection processes.
- Utilize special telephone services to call people staying at our Hotel in the event of serious events (natural disasters, etc.) affecting the hotel in question.
- Conducting surveys and analyzing surveys and customer comments.
- Managing claims/complaints.
- Securing and improving your use of our Hotel's websites, especially in the following areas:

- Improving navigation.
- Implement security and fraud prevention systems.
- - Fulfillment of our obligations under the Identity Information Law No. 1774.
- - To fulfill the obligations imposed by other relevant legislation (e.g. OHS Activities, Tax Procedure Law Obligations, etc.).

Apart from this, the main purpose of processing your personal data is to host you better and to ensure that our valued guests benefit from our services more and uninterruptedly.

5. Domestic or International Transfer of Your Personal Data

Your personal data can be accessed by The Halich Hotels and its affiliates in order to provide services within the Hotel, and your personal data is transferred to these companies when necessary.

Your personal data may be transferred and/or made accessible to organizations providing storage, archiving, information technology support (such as server, hosting, cloud computing) services at home and abroad, financial institutions that cooperate and / or receive services, consulting firms that receive support in law and similar fields, third parties providing support in other areas related to the activities of the Hotel and for specified purposes, to our business partners and authorized institutions and organizations in a controlled and limited manner (domestically) by taking the necessary security measures under the control of our Hotel's technical units.

During the domestic transfer of your data, all obligations are fulfilled by our Hotel within the framework of the Personal Data Protection Law No. 6698 and the relevant legislation. Within the framework of legal obligations and if necessary, your Personal Data may be transferred to state institutions, judicial bodies, foreign missions (embassies, consulates, etc.) established under international agreements.

6. Duration of Processing Your Personal Data

Your Personal Data will be processed until the end of this period, if there is a period stipulated in the relevant legislation for the storage of such data, or until the end of the period required for the purpose for which they are processed, if no such period is specified. If these periods expire, your Personal Data will be deleted, destroyed or anonymized ex officio or upon your request immediately in accordance with the rules of the legislation. If there is a change in your Personal Data within this period, you are obliged to inform The Halich Hotels or our related group company in order to keep your records up-to-date and accurate.

7. Camera Surveillance of Hotel Facilities

The entrances and exits, corridors, common areas and exterior facades of The Halich Hotels facility are monitored by cameras for the purpose of facility security, the safety of our guests and occupational health and safety, and there is a camera icon in the specified areas. We would like to state that your rights are reserved in accordance with the provisions of the Constitution and KVKK regarding these images. The purpose of surveillance and recording with cameras is to identify certain actions that may occur in the workplace, especially theft. These records can only be accessed by the authorized units of the Hotel. The records are kept for 21 days for security purposes and are destroyed at the end of the period.

8. Your Rights as a Data Subject under the PDP Law (Article 11)

By applying to our Company in accordance with Article 11 of KVKK you have the rights mentioned below;

- a)** Learn whether your personal data is being processed,
- b)** Requesting information if your personal data has been processed,
- c)** To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- d)** To know the third parties to whom your personal data is transferred domestically or abroad,
- e)** To request correction of your personal data in case of incomplete or incorrect processing,
- f)** To request the deletion or destruction of your personal data within the framework of the conditions stipulated in the relevant article of the Law,
- g)** Request notification of the transactions made pursuant to subparagraphs **(e)** and **(f)** to third parties to whom personal data are transferred,
- h)** To object to the emergence of a result to the detriment of the person himself/herself by analyzing your processed data exclusively through automated systems,
- i)** To request compensation for damages in case you suffer damage due to unlawful processing of personal data,

In order to use your rights mentioned above, you must provide the necessary information identifying your identity and a signed letter stating your request, including your explanations regarding your right you request to use from the rights specified in Article 11 of the KVK Law,

on behalf of CESEKA TURİZM VE YURT HİZMETLERİ TİC.LTD.ŞTİ. Emekyemez Mah. Tersane Cad. No:102 Beyoğlu/İstanbul-TURKEY address with documents identifying your identity, you can fill out our request form by applying in person within our company, send it through a notary public or by other methods specified in the KVK Law, or you can send the relevant application to cesekaturizm@hs1.kep.tr with secure electronic signature.