

**1. PERSON PROCESSING YOUR DATA (DATA CONTROLLER)**

As SAN-TUR TURİZM A.Ş. ("**Company**"), we attach the utmost importance to ensuring the security of your personal data. In this context, in accordance with the Law on the Protection of Personal Data No. 6698 ("**LPPD Law**"), we take the necessary measures to ensure the appropriate level of security in order to prevent unlawful processing of and access to your personal data, and to ensure its preservation during the processes of processing and transferring your personal data to third parties. With the awareness of this responsibility, in our capacity as Data Controller under the LPPD Law and relevant legislation, we process your personal data within the framework specified below.

**2. THE PERSONAL DATA WE PROCESS**

The personal data subject to processing by our Company are listed below.

<b>Identity Data</b>	Name, Surname, Nationality, TR ID Number, Passport Number, Mother's and Father's Name, Place and Date of Birth, Gender, Photograph, Signature, Number of Children, Age, <i>Additionally for Sole Proprietorship Customers: Tax Identification Number, Tax Office.</i>
<b>Contact Data</b>	E-Mail Address, Phone Number, Address.
<b>Legal Action Data</b>	Legal Action Information.
<b>Customer Transaction Data</b>	Language Preference Information (Language), Agency Information, Previous Number of Stays and Information, Number of Guests, Invoicing Information, Customer Group Information (VIP, Extra Features, etc.), Accommodation Information (Room Number, Hotel Check-in/Check-out Date Information), Fee/Payment Information (Receipt Number, Order/Check Information, Room Price Information, Discount Information), Order Information, Suggestion/Complaint/Request Information, Travel and Transfer Information in Case of Transfer Request.
<b>Financial Data</b>	Vehicle License Plate Information, Lost Property Information, Bank Account/IBAN Information, Fee/Payment/Tax Information.
<b>Marketing Data</b>	Information Obtained Through Survey Studies.
<b>Health Data</b>	<i>If Specified by You: Health Information, Disability Special Needs Information, Allergy and Dietary Restrictions Information.</i>

**3. METHOD OF COLLECTING YOUR PERSONAL DATA**

Your personal data is obtained for the purposes of fulfilling our Company's legal obligations, reasons stipulated in the laws, and the legitimate interests of our Company through:

- a. Forms and documents used by the Company regarding accommodation and services (such as Accommodation Form, Order/Check, Vehicle/Luggage Voucher, Lost Property Form, Dry Cleaning Form),
- b. Printed or digital reservation forms and documents filled out by you during reservation processes,
- c. Computer programs used by our Company to increase service delivery and quality,
- d. Online survey forms,
- e. Online programs such as reservation panel interfaces provided by travel, tour, and organization agencies,
- f. E-mail and related applications,
- g. Our call center,
- h. Messages and requests sent to our Company via social media channels,
- i. Reviews made by you about our Company in online environments regarding your stay.

**4. PURPOSE AND LEGAL GROUNDS FOR THE PROCESSING OF YOUR PERSONAL DATA**

1. \* Execution of Emergency Management Processes,
2. \* Execution of Information Security Processes,
8. \* Execution of Audit / Ethics Activities,
10. \* Execution of Access Authorization,
11. \* Execution of Activities in Compliance with Legislation,
12. \* Execution of Finance and Accounting Affairs,
13. \* Execution of Loyalty Processes for Company / Product / Services,
16. \* Follow-up and Execution of Legal Affairs,
17. \* Execution of Internal Audit / Investigation / Intelligence Activities,
18. \* Execution of Communication Activities,
20. \* Execution / Audit of Business Activities,
21. \* Execution of Occupational Health / Safety Activities,

22. \* Receiving and Evaluating Suggestions for the Improvement of Business Processes,
  26. \* Execution of After-Sales Support Services for Goods / Services,
  27. \* Execution of Goods / Service Sales Processes,
  28. \* Execution of Goods / Service Production and Operation Processes,
  29. \* Execution of Customer Relationship Management Processes,
  30. \* Execution of Activities Aimed at Customer Satisfaction,
  32. \* Execution of Marketing Analysis Studies,
  34. \* Execution of Advertising / Campaign / Promotion Processes,
  35. \* Execution of Risk Management Processes,
  36. \* Execution of Storage and Archiving Activities,
  38. \* Execution of Contract Processes,
  41. \* Follow-up of Requests / Complaints,
  42. \* Ensuring the Security of Movable Property and Resources,
  44. \* Execution of Wage Policy,
  45. \* Execution of Marketing Processes of Products / Services,
  46. \* Ensuring the Security of Data Controller Operations,
  50. \* Providing Information to Authorized Persons, Institutions, and Organizations For these purposes and particularly;
- **Execution of Accommodation Registration Processes:** your identity, contact, and customer transaction information;
    - for purposes numbered 2, 11, 12, 16, 17, 18, 20, 27, 28, 36, 38, 41, 46, and 50:
  - **Execution of Room Service Processes:** your identity and customer transaction information;
    - for purposes numbered 12, 27, 28, 29, 41, and 44:
  - **Execution of Food/Beverage Services Subject to Additional Charges** (in a la carte, meeting groups, and VIP service processes): your identity and customer transaction information;
    - for purposes numbered 12, 27, 28, 29, 41, and 44:
  - **Execution of Housekeeping Processes:** your identity, customer transaction, and health information;
    - for purposes numbered 2, 10, 18, 20, 26, 27, 28, 29, 30, 36, 38, 41, 46, and 50:
  - **Execution of Dietary Preference Registration Process:** your identity and customer transaction information;
    - for purposes numbered 28, 29, 30, 41, and 46:
  - **Execution of Technical Support Processes:** your identity and customer transaction information;

- for purposes numbered 20, 28, 29, 38, 41, 42, and 46:
- **Execution of Request and Complaint Tracking Processes:** your customer transaction information;
  - for purposes numbered 8, 17, 22, 27, 28, 29, 35, 41, 46, and 50:
- **Execution of A La Carte Reservation Processes:** your identity and customer transaction information;
  - for purposes numbered 20, 27, 28, 29, 36, 41, 44, 46, and 50:
- **Execution of Lost Property Processes:** your identity, customer transaction, and lost property information;
  - for purposes numbered 2, 8, 16, 17, 20, 35, 36, 41, 42, 46, and 50:
- **Execution of Room/Hotel Change Processes:** your identity and customer transaction information;
  - for purposes numbered 8, 16, 17, 20, 26, 27, 28, 29, 36, 38, 41, 46, and 50:
- **Execution of Accommodation Payment and Invoicing Processes:** your identity, contact, customer transaction, and financial information;
  - for purposes numbered 2, 11, 12, 16, 17, 20, 26, 27, 28, 29, 35, 36, 38, 44, 46, and 50:
- **Execution of Bicycle/Scooter Rental Processes:** your identity and customer transaction information;
  - for purposes numbered 2, 12, 26, 27, 28, 29, 36, 38, 41, 42, 46, and 50:
- **Execution of Vehicle and Luggage Registration Service Processes:** your identity, customer transaction, and financial information;
  - for purposes numbered 2, 8, 16, 17, 26, 27, 28, 29, 36, 38, 41, 42, 46, and 50:
- **Execution of Sickness/Ailment Registration and Tracking Processes:** your identity, customer transaction, and health information;
  - for purposes numbered 1, 2, 11, 16, 18, 20, 21, 26, 28, 29, 30, 35, 36, 41, 46, and 50:
- **Promotion/Advertising/Campaign Processes:** your identity, contact, and transaction security information;
  - for purposes numbered 2, 11, 13, 16, 30, 32, 34, 36, 41, 45, 46, and 50:
- **Execution of Communication Processes Aimed at Customer Satisfaction:** your identity, contact, and customer transaction information;
  - for purposes numbered 2, 13, 18, 22, 26, 29, 30, 41, and 46:
- **Execution of Survey and Reporting Processes:** your identity, customer transaction, and marketing information;
  - for purposes numbered 13, 18, 20, 22, 26, 28, 29, 30, 32, and 41:

limited to and processed based on the legal grounds specified in Article 5 of the LPPD Law: *“being explicitly stipulated in laws, being directly related to the establishment or performance of a contract, being mandatory for the data controller to fulfill its legal obligation, being mandatory for the establishment, exercise, or protection of a right, and being mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.”*

Your health data, on the other hand, is transmitted to us by you in line with your special requests during your reservation and other service/product orders, and is processed based on the legal grounds specified in Article 6 of the LPPD Law: *‘Relating to personal data made public by the data subject and being in accordance with the will to*

*make it public, and being processed by persons under the obligation of confidentiality or authorized institutions and organizations for the purpose of protecting public health, operation of preventive medicine, medical diagnosis, treatment, and nursing services.'*

On the other hand, your personal data mentioned above, and especially your contact information, in the event that your **explicit consent** is obtained pursuant to Article 5/2-a of the LPPD Law,

- 13. Execution of Loyalty Processes for Company / Products / Services,
- 30. Execution of Activities Aimed at Customer Satisfaction,
- 32. Execution of Marketing Analysis Studies,
- 34. Execution of Advertising / Campaign / Promotion Processes,
- 45. Execution of Marketing Processes of Products / Services.

Your personal data specified above is preserved with great care and in compliance with the provisions of the legislation by taking all kinds of administrative and technical measures aimed at ensuring the appropriate level of security.

## **5. SHARING OF YOUR PERSONAL DATA**

Your personal data submitted to us is shared with authorized public institutions and organizations, as well as business partners (agencies), suppliers/natural persons, or private legal entities, limited to the processing purposes specified above and as required.

Furthermore, since our mail server is within a service provider resident abroad, your personal data is transferred abroad based on the legal grounds of "data processing being mandatory for the establishment, exercise, or protection of a right" and "data processing being mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject" as specified in Articles 5 and 6 of the LPPD Law, and based on the signed Standard Contract.

Finally, for data subjects receiving services from our Company through agencies resident abroad, your personal data and requests at the minimum level required for the accurate and complete execution of accommodation and service processes may be shared with said agencies. In this context, your personal data is transferred abroad on an occasional basis, based on the legal grounds specified in Article 9/6 of the LPPD Law: "*b) The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken upon the request of the data subject. c) The transfer is mandatory for the establishment or performance of a contract to be concluded between the data controller and another natural or legal person for the benefit of the data subject. d) The transfer of personal data is mandatory for the establishment, exercise, or protection of a right.*" For processes where the agency you receive service from acts as a data controller, we recommend that you review the personal data protection policies of the respective agency.

## 6. DESTRUCTION OF YOUR PERSONAL DATA

Our Company retains the personal data it processes for the periods specified by the legislation, and in cases where no specific period is determined in the legislation, the personal data is retained for the period required for processing in accordance with our Company's practices and the customs of commercial life depending on the services provided while processing that data, and after this period, only for the durations established as necessary in practice to serve as evidence in potential legal disputes.

Following the expiry of the aforementioned periods, pursuant to Article 7 of the LPPD Law, the personal data in question is deleted, destroyed, or anonymized on the first destruction date.

## 7. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA

You may exercise your rights and requests set forth in Article 11 of the LPPD Law, in accordance with the provisions of the LPPD Law and the Communiqué on the Procedures and Principles of Application to the Data Controller published on 10.03.2018, as well as the relevant current legislation, by using the "Data Subject Application Form Pursuant to the Personal Data Protection Law" available at <https://www.agrimac.com.tr/kvkk> and by:

- You may deliver it in person/by hand to Kadriye Mah. Üçkum Tepesi Caddesi No: 8/1 Belek/ANTALYA, TÜRKİYE, or send it via notary public or registered mail with return receipt,
- You may send it to [info@megasarayhotels.com](mailto:info@megasarayhotels.com) via your e-mail address registered in our system,
- You may transmit it to [santur@hs02.kep.tr](mailto:santur@hs02.kep.tr) via a registered electronic mail address, with a secure electronic or mobile signature.

In order for a person other than the data subject to make a request, a notarized special power of attorney issued by the data subject in the name of the person making the application must be provided.

In this context, your requests submitted to our Company in accordance with the procedure will be finalized within thirty days at the latest. In the event that the finalization of your requests requires an additional cost, the fee set forth in the tariff determined by the Personal Data Protection Board ("**Board**") will be charged to the applicant by our Company. If our Company responds to your application via a recording medium such as a CD or flash drive, a fee determined not to exceed the cost of the recording medium may be requested.

Our Company may request information from the data subject in order to determine whether the applicant is the personal data owner, and may direct questions to the data subject regarding their application in order to clarify the matters stated in the application.

Pursuant to Article 14 of the LPPD Law, in cases where the application is rejected, the response is found insufficient, or the application is not responded to in a timely manner, the personal data owner may lodge a complaint with the Board within thirty days from the date they learn of our Company's response and, in any case, within sixty days from the date of the application.