

1. THE PERSON PROCESSING YOUR DATA (DATA CONTROLLER)

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

2. YOUR PROCESSED PERSONAL DATA

Your personal data subject to processing by our Company regarding you, our guests, and the child for whom you are the legal parent/guardian/representative, are listed below:

Identity Data	First Name, Last Name, Number of Children, Age, Nationality, Signature.
Contact Data	E-Mail Address, Phone Number.
Customer Transaction Data	Language Preference Information, Room Number, Price/Payment Information, Suggestion/Request/Complaint Information (Location of Family, Entry-Exit Information, Information on Going Outside Alone, etc.).

3. METHOD OF COLLECTING YOUR PERSONAL DATA

In accordance with the provisions of the KVK Law and relevant legislation, depending on the nature of the service provided to you by our Company, your personal data are obtained and processed via physical forms and documents for the purposes set out below, and in order to carry out all kinds of business included in the Company's field of activity within the legal framework and, in this context, to fully and properly fulfill the contractual and legal obligations of the Company.

4. PURPOSE AND LEGAL REASON FOR PROCESSING YOUR PERSONAL DATA

Your above-mentioned personal data;

- 1. Execution of Emergency Management Processes,
- 2. Execution of Information Security Processes,
- 8. Execution of Audit / Ethics Activities,
- 16. Follow-up and Execution of Legal Affairs,
- 17. Execution of Internal Audit Processes,
- 18. Execution of Communication Activities,

- 27. Execution of Goods / Services Sales Processes,
- 28. Execution of Goods / Services Production and Operation Processes,
- 29. Execution of Customer Relationship Management Processes,
- 30. Execution of Activities for Customer Satisfaction,
- 31. Organization and Event Management,
- 36. Execution of Storage and Archive Activities,
- 41. Follow-up of Requests / Complaints,
- 46. Ensuring the Security of Data Controller Operations,
- 50. Provision of Information to Authorized Persons, Institutions, and Organizations,

limited to these purposes and based on the legal reasons specified in Article 5 of the KVK Law: "*directly related to the establishment or performance of a contract, mandatory for the data controller to fulfill its legal obligation, mandatory for the establishment, exercise, or protection of a right, 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 personal data specified above are stored with great care and in compliance with the provisions of the legislation, taking all kinds of administrative and technical measures to ensure the appropriate level of security.

5. SHARING OF YOUR PERSONAL DATA

Your personal data transmitted to us may be shared, strictly limited to the processing purposes specified above and when necessary, with authorized public institutions and organizations, suppliers/natural persons, or private law legal entities.

6. DISPOSAL OF YOUR PERSONAL DATA

Our Company retains the personal data it processes for the periods specified by the legislation, and in the absence of a period specified in the legislation; personal data are stored for the period requiring processing in accordance with the practices and commercial customs of our Company depending on the services provided by our Company while processing that data, and after this period, for the periods whose necessity in practice is demonstrated solely for the purpose of serving as evidence in potential legal disputes. After the expiry of the specified periods, the personal data in question are deleted, destroyed, or anonymized on the first disposal date pursuant to Article 7 of the KVK Law.

7. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA

In accordance with the provisions of the KVK Law and the Communiqué on the Procedures and Principles of Application to the Data Controller published on 10.03.2018 and the relevant current legislation, by using the "Privacy Notice on Data Subject Application Pursuant to the Law on Protection of Personal Data" available at <https://www.megasarayhotels.com/tr/kvkk>, you may submit your rights and requests specified in Article 11 of the KVK Law by:

- Delivering in person/by hand to the address Kadriye Mah. Üçkum Tepesi Caddesi No: 8/1 Belek/ANTALYA, TÜRKİYE, sending via notary or by registered mail with return receipt,
- Sending to kvkk@megasarayhotels.com via your e-mail address registered in our system,
- Transmitting to santur@hs02.kep.tr with a secure electronic or mobile signature, via a registered electronic mail address.

For a person other than the data subject to make a request, there must be a notarized special power of attorney issued by the data subject on behalf of the person to apply.

In this context, your requests duly submitted to our Company will be finalized within thirty days at the latest. If the finalization of your requests requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board ("**Board**") will be charged to the applicant by our Company. If your application is answered by our Company via a recording medium such as CD or flash memory, 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 specified in the application.

Pursuant to Article 14 of the KVK Law, in cases where the application is rejected, the response given is deemed insufficient, or the application is not responded to in due time, 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 application.