



PERSONAL DATA PROCESSING AND PROTECTION POLICY

1. PREAMBLE

The purpose of this Personal Data Processing Policy is to set forth the procedures and principles regarding the processing of personal data stored by CARYA TURİZM YATIRIMLARI A.Ş. ("CARYA") as the data controller in accordance with the [**"Personal Data Protection Law"**](#) No.6698 and other legislations.

2. SCOPE

The personal data of our employees, prospective employees, guests and all other natural persons, whose personal data are held by CARYA for any purpose, are managed within the framework of the Personal Data Processing and Protection Policy herein.

3. DEFINITIONS

Law/KVKK: [**"Personal Data Protection Law"**](#) No 6698 dated 24/3/2016

Board/Authority: The Board of Protection of Personal Data/ The Authority of Protection of Personal Data

Personal Data: Any information relating to an identified or identifiable natural person

Data Subject: The natural person whose personal data is processed

Explicit Consent: Consent that is related to a specific issue, based on information and expressed with free will.

Anonymization: Rendering of personal data so that it can no longer be associated with an identified or identifiable natural person under any circumstances even by way of matching with other data.

Deletion of Personal Data: Deletion of personal data; the process of rendering personal data inaccessible and irrevocable by the relevant user.

Destruction of Personal Data: The process of rendering personal data inaccessible, irrevocable and unusable in any way by any persons.

Processing of Personal Data: Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, acquisition, making retrievable, classification or preventing the use thereof, fully or partially through automated means or provided that the process is a part of any data registry system, through non-automated means,

Authorized Employee: The natural person who processes personal data on behalf of the Data Controller upon his/her authorization,

Data Controller: Natural person or legal entity who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system.

Data processor: Any natural person or legal entity outside the Data Controller's organization who processes personal data on behalf of the Data Controller upon his/her authorization

Sensitive personal data: Personal data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance or clothing, affiliation to associations, foundations or trade-unions, health, sexual life, convictions, data relating to security measures, biometric and genetic data

Obligation to Inform: The obligation to inform the data subjects, the controller or the person granted authority by the data controller, whilst collecting personal data, about the identity of the data controller and, if any, its representative, the purpose of data processing, to whom and for what purposes the processed data may be transferred, the method and legal reason of collection of personal data and the other rights set forth under article 11,

Fidelio: Front Office, accounting and procurement Automation System



Destruction: The deletion, removal or anonymization of personal data

Destruction Policy: The policy that the data controller adopts to determine the maximum time required for the purpose for which the personal data is processed for and for the process of deletion, removal or anonymization of personal data and the process

Recording Medium Any medium, where personal data is fully or partially processed through automated means or provided that the process is a part of any data registry system, through non-automated means.

Netahsilat: Online payment system

Company: Carya Turizm Yatırımları A.Ş.

4. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

4.1. Compliance with the Law and rules of good faith: The COMPANY shall protect the individual rights of the data subjects in the course of the processing of personal data. Personal data shall be collected and processed in a fair manner and by lawful means.

4.2. Being processed for specific, explicit (transparency) and legitimate purposes and being relevant, limited and restrained to the purposes for which the data is processed:

The COMPANY shall provide information as to the purpose of processing personal data prior to the processing of the data. The COMPANY shall process personal data solely for the purpose of providing better service for the data subject. During data gathering, the data subject shall be informed as to the identity of the data controller or its authorized representative (if any), the purpose for the processing of the data, to whom and for what purposes the personal data can be transferred , the method of and legal reason for collecting personal data and the rights of the data subject.

4.3. Being stored for the period of time stipulated by relevant legislation or for the purpose for which the data is processed. The COMPANY shall only store personal data for the period of time stipulated by relevant legislation or for the purpose for which the data is processed. The COMPANY and its subsidiaries shall continue to process and store personal data in accordance with the purposes set forth in this policy, as long as personal data is deemed necessary for the purposes for which it is processed and required by regulatory authorities and / or relevant laws and regulations.

4.4. Data being accurate and up to date: The COMPANY shall keep processed personal data accurate, complete and, if necessary, up-to-date. When necessary, inaccurate or incomplete data shall be deleted, corrected, completed or updated.

4.5. Privacy and data security: Personal data is subject to data privacy. It is considered confidential at the personal level and necessary technical and administrative measures shall be taken to ensure the proper level of security in order to prevent unauthorized access, unlawful processing or distribution, as well as to prevent accidental loss, alteration or destruction, and to protect personal data.

5. SCOPE OF DATA PROCESSING

Personal data processing is performed in two different ways.

Fully or partially automated processing of data; Includes the collecting, recording, photographing, audio recording, video recording, organizing, storing, modifying, restoring, retrieving or disclosing the data of the data subject or third parties as specified herein, for the purpose of transferring, distributing or other means of presenting, grouping or combining, blocking, deleting or destruction.



Non-automated processing of data; Includes the recording, storing, retaining, modifying, reorganizing, disclosing, transferring, transferring abroad, acquisition, accessing , classification or blocking of personal data, provided that it is a part of a recording system.

- 5.1. The COMPANY shall be entitled to process the personal information of the data subject during the period of use of its services and following the termination of the service relationship, in accordance with the purposes set forth herein.
- 5.2. Personal data processing by the COMPANY covers any action taken on the data using fully or partially automated means or provided that the process is part of an automated system, through non-automated means, without any restrictions.
- 5.3. The COMPANY processes the data of the data subject or persons under his/her guardianship.
- 5.4. Data processing also includes data sharing of the data subject and/or third parties through their explicit consent by the orders given by the COMPANY and/or when the COMPANY is the data processor acting on the behalf of and through the orders of a third party.
- 5.5. The explicit consent of the data subject includes the recording and processing of the activities of the data subject by the COMPANY while using various electronic channels including, but not limited to, the technical methods and channels used for web browser, website, internet, mobile applications, payment transactions, money transfers and purchases. (for example, identifying and analyzing the location, input data, product selection and / or other statistical data while using electronic channels)

6. Fundamentals of Data Processing

- 6.1. The data subject agrees that during the use of the COMPANY's services and even upon the termination of the contractual relation, the COMPANY, for the purposes specified below, is required to process data belonging to the data subject or to third parties specified by the data subject
 - a) The provision and/or implementation of a service to the data subject
 - b) Data processing is mandatory for protecting the legal rights of the COMPANY and / or third parties,
 - c) Fulfilling the legal obligations of the COMPANY,
 - d) It is necessary to process the personal data of the data subject, provided that it is directly related to the establishment or performance of a contract between the data subject and the COMPANY,
 - e) Data processing is mandatory for the establishment, use or protection of a right,
 - f) Other matters to which the data subject gives explicit consent
 - g) Other matters explicitly stipulated by the legislation.
- 6.2. The explicit consent of the data subject shall mean that the data subject has accepted the policy and its provisions.

7. Purposes for Data Processing



The COMPANY and/or third parties that process personal data with the consent of the data subject, may process the personal data of the data subject or of persons under the guardianship of the data subject for the following purposes

- a) To fulfil the accommodation services in the manner declared, to execute and provide better and more reliable services to the guests,
- b) The COMPANY makes and receives payments via the Netahsilat online system. During these processes, the guest's data (name, surname, date of birth, e-mail address, phone number and credit card) may be used, data research and survey evaluations may be carried out, planning, statistics, archiving, storing services may be provided, and customer satisfaction studies can be done,
- c) It is necessary to check the accommodation history and / or behavior patterns of the data subject to optimize and improve the COMPANY services
- d) For the COMPANY to offer new and / or additional services or non-service products,
- e) Changing the existing conditions of the services provided by the COMPANY,
- f) For the COMPANY to analyze statistical data, for preparing and presenting various reports, researches and / or presentations,
- g) In addition to ensuring security; identifying and / or preventing abuse and other criminal activities,
- h) Addressing the complaints, questions and requests of the data subject,
- i) To verify the identification of the data subject.
- j) For advertising, marketing, promotion and campaign activities for accommodation services,
- k) To fulfil other purposes stipulated in national and international laws and regulations.

8. Processing, Transfer and Disclosure of Personal Data

The COMPANY fulfils the obligations imposed by the relevant legislation and board resolutions regarding the processing, transfer or disclosure of personal data. For the purposes set out herein, including, but not limited to, the personal data specified below of the data subject and third parties;

In order to process, transfer and / or disclose any information provided by the COMPANY, depending on the type and variety of the accommodation service; the data subject's name and surname, personal identification number and / or unique feature on the identification card, registered and / or permanent address, telephone / mobile number, e-mail address, Employer data, as well as information on employment conditions (workplace, salary, working hours, etc.), The activities of the data subject and / or the third parties specified by the data subject while using various electronic channels and / or the Internet (including, but not limited to, cookies, etc.) and the aforementioned channels (including, but not limited to, verification of these channels, actions taken, or transaction history), using the data of the persons with whom the data subject has stayed with during the duration of the service.

8.1. If the data subject provides the personal data (including but not limited to personal data, sensitive personal data, etc.) of third parties (family members, employers, etc.) to the COMPANY for the purpose of making use of the COMPANY's services; the data subject submitting this personal data to the COMPANY shall be responsible for obtaining the consent to process such personal data.



- 8.2.** If the data subject provides the COMPANY (or its authorized personnel) with such information, the data subject shall be deemed to have given the required explicit consent and the COMPANY shall no longer be required to obtain such explicit consent.
- 8.3.** In the event that personal and / or sensitive personal data are processed without the explicit consent of the data subject and if damage arises as a result of such transaction, the COMPANY shall be liable to cover the occurring loss.
- 8.4.** The explicit consent of the data subject shall cover the recording and processing of the activities (for example, , determining the location of the data subject while using an electronic channel, identifying and analyzing input data, frequency of product selection and / or other statistical data) of the data subject by the COMPANY while using various electronic channels (including, but not limited to, the technical methods and channels used for web browser, website, internet, mobile applications, payment transactions, money transfer and receival).
- 8.5.** Under the Law no. 6563 on the Regulation of Electronic Trade, the COMPANY has the right to send commercial electronic messages including SMS, voice and / or other marketing messages (direct marketing) to the telephone, mobile number, e-mail address and other contact information provided by the data subject until the data subject uses his/ her right to reject;
- 8.6.** The data subject grants the right to the COMPANY to share his/her personal data with the COMPANY's subsidiaries and / or shareholders in order to make various marketing offers.
- 8.7.** Advertising / informative messages (e.g. advertising brochures, promotional images, verbal offers, etc.) at the COMPANY's service points or the content displayed by the COMPANY (or its subsidiaries) during the use of electronic channels such as the Internet, mobile marketing, etc. will not be regarded as direct marketing as such the data subject will not have the right to request the termination of the publication and / or display of such content.

9. Data Processing of Applicants or Employees

9.1. Processing of personal data to conclude, execute, maintain and terminate a service contract:

The Company shall reserve the right to process personal information disclosed by the data subject due to the commencement of work, trial period and / or internship for the purpose of executing human development and training processes such as fulfilment and maintenance of personal rights arising from the service contract, occupational health and safety services to be provided to employees, fulfilment of work permit procedures, evaluation of personal job applications, performing research and other recruitment processes, performance evaluation and follow-up, training activities, improvement of working conditions and personal development processes.

During the application process for employment, the collection of information about the applicant by third parties is carried out in accordance with the provisions of the Personal Data Protection Law No. 6698.

The applicant's explicit consent is required for processing personal data relating to the business relationship but not initially part of the performance of the employment contract.

Processing of Sensitive Personal Data; Sensitive personal data, excluding those relating to health and sexual life, may only be processed in the cases provided for by the laws, sensitive personal data relating to



health and sexual life may only be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

10. Transferring / Sharing Information To/From Third Parties

In order for the COMPANY to provide services to the data subject, this policy shall be transferred / shared with the data subject and / or third parties specified by the data subject within the scope of data processing.

The data subject shall grant the COMPANY the right for the personal data to be collected, stored, retained, modified, reorganized, disclosed, transferred, transferred abroad, acquired, attainable or classified fully or partially through automated means or provided that the process is a part of any data registry system, through non-automated means, via all departments, the internet, call centers, public institutions and organizations and the parties from whom the COMPANY receives services that are complementary or extensions of its activities and suppliers.

11. Obligations of the Data Controller and Data Processor

11.1. In accordance with the provisions herein; while processing certain types of personal data, the COMPANY may be the data processor and may act on behalf of the data controller, including third parties. The data controller may be the data processor of some personal data of the third parties. Accordingly, each of the parties of such a relationship (the data processor as well as the data controller) shall act in accordance with the Law on the Protection of Personal Data. Therefore;

- a) Personal data shall be processed in accordance with the principles as set forth in the legislation.
- b) Explicit consent shall be obtained from the data subject and the necessary information and clarification shall be provided to the data subject.

If a request is made by the data subject regarding the information about his / her personal data, if a complaint or statement regarding the compliance of the data controller with the obligations of the legislation is submitted, the data controller shall inform the data subject in the soonest time possible and at the latest within 30 days.

Furthermore, if one party acts as the data processor and the other as the data controller during data processing, the data processor shall fulfil the following obligations. The data processor is obliged to;

- i. Process the data transferred/ disclosed by the other parties as defined by the provisions of this policy and in accordance with the extent and scope permitted by the legislation or at the request of a regulatory authority,
- ii. Take all reasonable technical and administrative measures and all necessary actions to prevent unauthorized processing, loss, destruction, damage, unauthorized alteration or disclosure of the data transferred / disclosed by the data controller, and to inform the data controller about all measures taken within this scope,



- iii. Through its authorized personnel, the COMPANY monitors the measures and practices implemented by the data processor for data security purposes,
- iv. Cooperate and provide support for the review of a complaint or statement communicated / disclosed by the COMPANY, including the following by the data processor,
- v. Provide the COMPANY with detailed information about the complaint and declaration status, including data about the data subject (including electronic data), communicated / disclosed to the data processor by the data controller, within 7 business days of the request date,
- vi. Prevent the data processor from processing (transferring) data to a country and / or international organization that is not part of the European Economic Area and is not on the list of countries that are adequate for the protection of personal data or not permitted by the Personal Data Protection Board,
- vii. Does not transfer / disclose data to third parties without the prior written consent of the COMPANY,
- viii. The data processor is obliged to transfer/disclose data in accordance with a written contract even in the case that the COMPANY has provided written explicit consent in advance. In the aforementioned written contract, the third party and its subcontractors are obliged to take all necessary technical and administrative measures to prevent unauthorized processing, loss, destruction, damage, unauthorized alteration or disclosure of the data.
- ix. To compensate all damages / losses incurred by the COMPANY due to the failure of the data processor (in accordance with the policy and legislation) to take the necessary actions or fulfil the actions in full. The data processor explicitly consents and agrees with the data controller for the settlement of damages and compensation for any damages / losses (including but not limited to consequential damages) that may be incurred by the COMPANY as a result of the breach of the data processor, complaints, expenses (including, but not limited to, the expenses incurred by the COMPANY using its legal rights), and for other obligations and legal processes.
- x. Unless otherwise specified in the contract between the COMPANY and the data processor, to render any data (including personal data) transferred / disclosed from the COMPANY after the termination of the contractual relationship between the COMPANY and the data processor; obliged to take all necessary security measures to prevent unauthorized access to the data by third parties, to destroy the personal data transferred / disclosed by the COMPANY and to notify the COMPANY to confirm the fulfilment of this action.

12. Data Update, Processing, Retention Period and Data Destruction

- 12.1.** Shall continue to operate during the use of the Company's services and thereafter for the purposes set out herein for a period of time consistent with the objectives and interests of the COMPANY, the demands of supervisory / regulatory authorities and / or legislation.
- 12.2.** The processing of the data transferred during the data subject's use of electronic channels (web browser, web site, internet, mobile applications and / or other electronic data transfer tools) shall continue even after the data subject has deleted the data from the relevant electronic channels.



- 12.3.** Information regarding personal data held by the COMPANY shall be provided in compliance with the legislation upon the request of the data subject,
- 12.4.** In case the data subject's personal data held by the COMPANY is incomplete or incorrect, the missing and incorrect data shall be completed and corrected upon the notification of the data subject to the COMPANY in writing.
- 12.5.** Personal data shall be kept for a period of time as stipulated by the relevant legislation or for the purpose for which it is processed and in any case for 10 years. Although processed in accordance with the provisions of the legislation, personal data is deleted, destroyed or anonymized by the data controller either ex officio or upon the request of the data subject in the event that the reasons that require processing no longer exist or the COMPANY's retention period expires.
- 12.6.** The determination of the storage and destruction periods of personal data shall be carried out using the following criteria:
 - a) Authorized access and matrix control system are used to determine which of the exceptions stipulated in Articles 5 and 6 of the Law can be evaluated for data storage. For each personal data, relevant users, their authorization and methods of accessing, retrieving and re-using data are determined, and in case of termination of employment or change of position etc. the relevant user's authorization and methods to access, retrieve, and reuse personal data are updated, removed or terminated.
 - b) In the event that the period stipulated in the legislation for the storage of such personal data expires or if no period is stipulated in the relevant legislation for the storage of such data, the data shall be deleted, destroyed or anonymized by the data controller in 10-year periods.
- 12.7.** In the deletion, destruction and anonymization of personal data, the principles set forth in Article 4 "General Principles" of the Law and the measures to be taken within the scope of Article 12 "Obligations Regarding Data Security" of the Law, the provisions of the relevant legislation, the decisions of the organization and this policy shall be complied with.
- 12.8.** All transactions regarding the deletion, destruction, and anonymization of personal shall be recorded by the COMPANY. These records shall be kept for at least 10 years excluding other legal obligations.
- 12.9.** Unless otherwise decided by the Personal Data Protection Authority, the appropriate method of deleting, destroying or anonymizing personal data shall be selected by the COMPANY.
- 12.10.** The personal data collected by the COMPANY shall be stored in various recording medium and deleted by appropriate methods. Personal data kept in digital mediums shall be deleted using a delete command and / or manually, and personal data kept in printed medium shall be deleted by way of blanking. Blanking is performed by way of trimming, where possible, of the personal data on the relevant document, and in cases where this is not possible, by rendering such data invisible for the relevant user by using fixed ink so that it cannot be reversed or read by way of technological solutions.

The office files on the central server shall be deleted by using the delete command in the operating system of the file, or the access rights of the relevant user shall be removed on the directory where the file or file is located.



The use of flash memory is restricted. The database containing personal data is protected by authorization levels and the deletion process is subject to authorization. When performing the operation, attention is paid to whether the user concerned is also the database administrator.

Destruction of personal data is the process of rendering personal data inaccessible, irrevocable and unusable in any way by any persons. The COMPANY, the Data controller, shall take all necessary technical and administrative measures related to the destruction of personal data. For the destruction of personal data, all copies of the data shall be located and the systems where the data is located shall be physically destroyed by means of dissolving, burning or dusting of the optical or magnetic medium. By dissolving, burning, dusting or grinding through a metal shredder the data stored in optical or magnetic media shall be made inaccessible.

Network devices (switches, routers, etc.) shall be destroyed by using a delete command, mobile phones (sim card and fixed memory areas) shall be destroyed with the delete command in the fixed memory areas in mobile smartphones or by means of physical destruction; optical disks, if any, and data storage medium such as CDs, DVDs shall be destroyed by means of physical destruction such as burning, shredding and melting.

The destruction of the personal data in the devices that are defective or sent for maintenance is by removing the data storage medium and sending the defective parts to third institutions such as the manufacturer, seller and technical service. Necessary measures shall be taken to prevent the outside staff coming for maintenance and repair purposes from copying and transferring personal data out of the organization. The required confidentiality agreements with related maintenance companies exist.

Anonymization is removing or changing all direct and / or indirect identifiers in a data set to prevent the data subject from being identified, or losing its distinguishability within a group/crowd so that it cannot be identified with a natural person. The purpose of anonymizing is to break the links between the data and the person whom this data defines. The data is anonymized by selecting one appropriate link breaking method such as automatic or non-automatic grouping, masking, generalization and randomization for the relevant data in the data registry system.

13. Rights of the Data Subject

Every data subject has the right to learn whether or not his/her personal data is processed, to request information as to the processing of his/her personal data, to learn the purpose of his/her data processing and whether this data is used for the purposes intended, to know the third parties to whom his/her personal data is transferred to at home or abroad, to request the rectification of the incomplete or inaccurate data (if any), to request the deletion or destruction of his/her personal data, to request notification of the transfer of his/her data to third parties, to object to the occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems; to request compensation for the damage arising from the unlawful processing of his/her personal data.



14. Privacy of Data Processing

- 14.1.** Personal data is subject to data security. Any employee of the COMPANY, its affiliates and / or its subsidiaries is prevented from accessing these data unauthorized, and unauthorized persons are strictly prohibited from processing or using this data. Any employee of the COMPANY, its affiliates and / or subsidiaries not authorized by his/her job description to process this data shall be deemed as unauthorized processing. Employees of the COMPANY, its subsidiaries and / or subsidiaries may access personal data only if they have authorized access to personal data within their job description.
- 14.2.** Employees of the COMPANY, its affiliates and / or subsidiaries are prohibited from using personal data for private or commercial purposes, to share this data with unauthorized persons or render this data accessible using other methods. The data controller shall inform its employees about their obligation to protect data confidentiality during the start of their employment and provide training to its employees.
- 14.3.** For the security and protection of property and privacy, as well as the control and measurement of service quality, video and audio recording are made around buildings and workplaces and their entrances, the kitchen and service background etc. in accordance with the provisions of the Personal Data Protection Law no. 6698.
- 14.4.** At the COMPANY'S relevant service points and when communicating with the COMPANY, the data subject is informed about video recording and video inspection conducted using the appropriate tools. The data subject acknowledges the importance of video and audio recording and hereby gives explicit consent to the COMPANY to process his/her data in this respect.

15. Data Processing Security

Personal data is protected from unauthorized access, illegal data processing or disclosure, and accidental loss, modification or destruction. Data is protected whether processed electronically or on paper. New and advanced data processing methods and information technology systems are closely followed in order to take technical and administrative measures to protect personal data.

16. Data Control

Compliance with this Data Protection Policy and the applicable data protection laws shall be regularly monitored by authorized persons in charge in the relevant departments of the COMPANY. The Personal Data Protection Board may, as permitted by national laws, to monitor the compliance of the COMPANY, its subsidiaries and affiliates to the stipulations of this policy.

17. Communication

In the event that the data subject conveys to the data controller in writing his/her requests relating to the enforcement of this policy or the implementation of the Personal Data Protection Law, the data controller shall conclude the request involved in the applications within the shortest possible time depending on the nature of the request and within thirty days at the latest and free of charge. However, if the transaction necessitates additional costs, the fees in the tariff set by the Personal Data Protection Board shall be charged.