



## **SUPPLIER, BUSINESS PARTNER AND OUTSOURCED SERVICE PROVIDER CLARIFICATION TEXT REGARDING THE PROCESSING AND PROTECTION OF PERSONEL DATA**

In this Clarification Text, in accordance with the provisions of the Personal Data Protection Law No. 6698 (hereinafter referred to as the "**Law**"), CARYA TURİZM YATIRIMLARI A.Ş shall hereinafter be referred to as the "**Company**".

Data controller; is the person authorised by CARYA TURİZM YATIRIMLARI A.Ş for the purpose of providing clarification on the procedures and principles regarding the processing of personal data, provided by you or by the authorities of your company in contractual relationship with our Company, which may be subject to processing by our Company.

Your personal data shall be processed in accordance with the principles listed in Article 4 of the Law;

- In compliance with the Law and rules of good faith,
- Accurate and up-to-date,
- Processed for specific, explicit and legitimate purposes,
- Being relevant, limited and restrained to the purpose for which it is processed,
- Stored for the period of time stipulated by the relevant legislation or for the purpose for which it is processed.

In addition, we shall process your personal data as defined in the Law limited to the purposes and conditions set out in the personal data processing conditions specified in paragraph 2 of Article 5 and paragraph 3 of Article 6 of the Law.

Accordingly, we shall process your personal data in the following circumstances:

- Data processing is mandatory for the legitimate interests of our Company within the scope of our commercial relations or our business relationship with you, provided that the fundamental rights and freedoms of the relevant person are not harmed,
- Processing of your personal data by our Company is directly related to and necessary for the establishment or performance of a contract,
- Processing your personal data is mandatory for our Company to fulfil its legal obligations,
- Provided that your personal data is made public by you, processing your data by our company is limited by the purpose of your publication,
- Processing personal data is mandatory for our Company for protecting the life or physical integrity of the data subject or of any other person, where the data subject is legally or physically incapable of giving consent
- Processing sensitive personal data excluding those relating to health or sexual life is provided for by the Law

In this context, our Company shall process your personal data for the following purposes:

- Execution of activities in accordance with the legislation,
- Implementation and follow up of legal activities
- Conducting and controlling business activities,
- Execution of communication activities

- Contract execution processes,
- Carrying out the procurement processes of goods / services,
- Conducting after-sales support services for goods / services,
- Execution of goods / service sales processes,
- Execution of the production and operation processes of goods / services,
- Execution of guest / customer relationship management processes
- Carrying out activities for customer satisfaction,
- Receiving and evaluating suggestions for the improvement of business processes,
- Conducting advertisement / campaign / promotion processes,
- Follow-up of requests / complaints,
- Carrying out marketing activities for products / services
- Conducting marketing analysis
- Providing information to authorized persons, establishments and institutions, executing finance and accounting processes
- Other: ensuring the execution of reservation services
- Other: room arrangement, executing finance and accounting processes, executing supply chain management processes

We declare that your personal shall be processed;

1. Within the scope of our commercial relations or our business relationship with you,
2. Within the scope of the purpose that requires them to be processed and with regard to this purpose in a related, limited and restrained manner,
3. By maintaining the personal data which you have submitted or was submitted to us accurate and up-to-date
4. May be recorded, stored, maintained, reorganized, shared with the institutions authorized by law to request such personal data, transferred to domestic or foreign third parties as provided for by the Law , transferred, classified or processed in other ways as specified in the Law.

The Company shall pay particular attention to the security of personal data and shall take all necessary technical and administrative measures. Following the termination of the service, by taking all necessary administrative and technical measures, the identification and communication data specified under the heading of Processed Personal Data below shall be kept for 10 years, your sensitive personal data and audio-visual data and the personal data of your family and relatives shall be kept for 2 years.

While your personal data may vary depending on the services provided by the Company and the commercial activities of the Company; it may be collected verbally, in writing or electronically by automated or non-automated means, through the Company's business units and offices, group companies, website, social media channels, mobile applications, agencies and similar means. Throughout your use of the products and services provided by our Company or group companies, your personal data may be generated and updated.

Furthermore, your personal data may be processed when you use our call centres or website to utilize company services, when you visit the Company or our website, request services from the Company through agencies, and participate in training, seminars or events organized by the Company.



#### PROCESSED PERSONAL DATA

**Identification:** Name, surname, Turkish ID number

**Contact Information:** Telephone number, business phone number, postal code, invoice address, full address (if you are a sole proprietorship), work address, e-mail address, business e-mail address

**Audio - Visual Records:** Audio recordings, camera recordings, photographs belonging to a natural person

**Location:** Room number if accommodation is needed, travel related information, transfer information, transfer stop-over data

**Processing Security:** internet access logs, input and output logs

**Physical Environment Security:** Company employee check-in and check-out dates

**Other:** License plate, Supplier product acceptance information, agency / company information, profession, bank account number (if you are a sole proprietorship), date of commencement (if you are a sole proprietorship), last three years profit or loss (if you are a sole proprietorship)

#### To Whom and For What Purposes Processed Data May Be Transferred

Within the framework of the conditions specified in this clarification text and by taking the necessary measures, your personal data may be transferred to our business partners, suppliers, company officials, shareholders, legally authorized public institutions and private persons for the purpose of conducting necessary studies in order for you to benefit from the products and services offered by our Company, to customize our products and services according to your likes, usage habits and needs, to ensure the legal and commercial security of the persons in a business relationship with our Company and group companies (the administrative operations carried out for communication, ensuring the physical security and surveillance of the sites of our Company, evaluation processes of business partner / customer / supplier (authorized personnel or employees), reputation management processes, legal compliance process, audit, financial affairs etc.), for determining and implementing the business strategies of our Company and ensuring the execution of the guest services policies of our Company

Your personal data collected in the existence of legal obligations or the conditions under Articles 8/2 and 9/2 of the Personal Data Protection Law (KVKK) shall be shared with banks, our company lawyers, legal and administrative authorities requesting information, third party person or persons from whom our Company will receive services to accomplish its objectives or with public institutions or organizations legally authorized to request this data, for such purposes as payment and collection processes, contract execution processes, exercising our right to legal defence in possible legal disputes, investigations, judicial or administrative audits and other cases, provided that it is in compliance with the Law and rules of good faith, accurate and up-to-date, limited and restrained for explicit and legitimate purposes.

Persons to Whom Data May Be Transferred	Description	Purpose for Data Transfer
Business Partner (Agency, customer etc.)	Defines the parties that the Company has established a business partnership with for the purpose of buying or selling services during the course of the Company's commercial activities.	Limited to the purpose of; Ensuring that the establishment objectives of the business partnership are fulfilled, to evaluate authorized personnel or employees
Supplier	Defines the parties that offer products / services to the Company on a contractual basis in accordance	Limited to the purpose of providing the products and services that the company acquires from external sources for

	with the Company's orders and instructions, during the course of the Company's commercial activities.	conducting its commercial activities
Company Officials	Company board members and other authorized natural persons	Limited to the purpose of ensuring the physical security and surveillance of the sites of the company, to develop strategies for the commercial activities of the company in accordance with the provisions of the relevant legislation, to ensure the highest level of management, financial affairs etc.
Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized to receive information and documents from the Company according to the provisions of the relevant legislation	Limited to the purpose requested by the relevant public institutions and organizations within their legal authority
Legally Authorized Private Legal Persons	Private legal persons authorized to receive information and documents from the Company according to the provisions of the relevant legislation	Limited to the purpose requested by the relevant private law persons within their jurisdiction

#### **Method and Legal Reason for Personal Data Collection**

During the signing of various contracts, commitments, protocols, etc. we collect your data by receiving the signatory circular submitted by you as the authorized signatories in the annex of these legal texts and we process this data to store in print or digital format, transfer to relevant authorities in case of disputes, transfer to authorized persons and institutions for the execution of the contract and to create a database by automated or non-automated means depending on the attributes and nature of the personal data to be processed /requested to be processed, and to create lists, fill documents, write petitions, fill forms etc.

#### **Precautions for the Protection of Personal Data**

Protection of personal data is an important issue for our Company. Our Company takes the necessary technical and administrative measures to protect personal data against unauthorized access or loss, misuse, disclosure, alteration or destruction of this information. Our Company undertakes to keep your personal data confidential, to take all necessary technical and administrative measures and to show the necessary care to ensure privacy and security.

Despite the necessary security measures taken by our Company for the protection of data, in the event that personal data is breached as a result of attacks on the website and the system or is obtained by third parties, our Company will immediately notify you and the Personal Data Protection Board.

#### **Keeping Personal Data Accurate and Updated**

Persons who share their personal data with our Company accept and declare that they have the knowledge that the accuracy and updatedness of the data provided are important both in terms of their rights regarding personal data under the Personal Data Protection Law No.6698 and other relevant legislations and that they shall have full liability arising from providing false information.



You may notify our Company of the changes and/or updates to your personal data which you have submitted to us via the e-mail address stated below or via postal mail to our Company's mailing address.

**According to Article 11 of the Law, you have the following rights:**

- a) To learn whether personal data has been processed or not,
- b) To request information regarding personal data if it has been processed,
- c) To learn the purpose of the processing of personal data and whether it is used for its intended purpose,
- ç) To know the third parties to whom personal data has been transferred to in Turkey or abroad,
- d) To request the rectification of incomplete or incorrect personal data, if any,
- e) To request the deletion or destruction of personal data,
- f) To request the notification of operations carried out as per subparagraphs (d) and (e) to third parties to whom personal data has been transferred,
- g) Object to the occurrence of any result that is detrimental to the data subject's interests by means of analysis of personal data exclusively through automated systems,
- h) To request compensation for the damage arising from the unlawful processing of personal data.

Your requests in your application shall be concluded free of charge and within thirty days at the latest, depending on the nature of the request. However, if the transaction necessitates an additional cost for the Company, the fee determined by the Personal Data Protection Board in the "Communiqué on the Procedures and Principles on the Application to the Data Controller" may be charged.

You are required to submit your application regarding the processing of your personal data to our Company by filling out the application form on our Company's web site in writing or by using your registered e-mail address, secure electronic signature, mobile signature or by using your e-mail address which you have previously submitted to us and which is kept in our records. Depending on the reason of your request and your application method, additional verifications (such as sending a message to your registered phone, or a phone call) may be requested by our Company in order to determine whether the application belongs to you and thus to protect your rights. For example; if you apply through your e-mail address registered at the Company, we may contact you using another contact method registered in the Company and request confirmation of whether the application belongs to you.

**What are the methods for application?**

Pursuant to paragraph 1 of Article 13 of the Law, you may submit your request regarding the exercise of your aforementioned rights to our Company in writing or via other methods determined by the Personal Data Protection Board. In this context, the channels and procedures by which you shall submit your written application within the scope of Article 11 of the Law are explained below.

In order to exercise your aforementioned rights, you may fill and sign the KVKK Application Form at <https://www.regnumhotels.com/en/personal-data-protection/> and send it to the Company along with the necessary information for verifying your identity

(i) After filling the application form, you may submit the signed copy of the form in person or via public notary to Regnum Carya's mailing address.

(ii) You may fill the application form and send it to the e-mail address [kvkk@regnumhotels.com](mailto:kvkk@regnumhotels.com) with your "Secure Electronic Signature" under the Electronic Signature Law No. 5070 or your mobile signature,



or by using the e-mail address previously submitted by the relevant person to the data controller and registered in the data controller's system.

In order for third parties to submit applications on behalf of the data subject there must be a special power of attorney issued by a notary public to the person submitting the application on behalf of the data subject.

Carya Turizm may request information from the relevant applicant in order to determine whether he/she is the data subject, and may ask questions to the data subject about his/her application in order to clarify the issues specified in the application.

Such rights shall be evaluated and concluded within 30 (thirty) days if they are submitted by the methods specified in the policy. Although it is essential that no fee is charged for the requests, the Company reserves the right to ask for a fee based on the fee rate determined by the Personal Data Protection Board.

#### **Erasure, destruction or anonymizing of personal data**

Your personal data processed for the reasons specified in the Clarification Text herein shall be deleted, destroyed or anonymised by our Company either ex officio or upon your request in accordance with our "Personal Data Storage and Destruction Policy" when the reason for necessitating data processing ceases to exist according to Article 7/f.1 of the Personal Data Protection Law ( KVKK) or the duration periods specified by the relevant Laws expire.

#### **DATA CONTROLLER'S IDENTIFICATION INFORMATION**

CARYA TURİZM YATIRIMLARI A.Ş.

**Address:** Kısıklı Mahallesi Alemdağ Cadde No: 60d/6 Üsküdar İstanbul

**KEP Address:** [caryaturizm@hs01.kep.tr](mailto:caryaturizm@hs01.kep.tr)

#### **CONTACT INFORMATION**

**Address:** Regnum Carya- Kadriye Bölgesi Üçkumtepesi Mevkii, Belek Antalya

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