

GUEST PRIVACY NOTICE

This Privacy Notice has been prepared by **Aksa Turizm İşletmeleri A.Ş.** (the “**Company**”), acting as the data controller, in order to inform you about the personal data we process in accordance with the Law on the Protection of Personal Data No. 6698 (“**KVKK**”) and the relevant legal regulations.

1. Your Processed Personal Data and Scope of Processing

Personal data refers to any information that identifies individuals, such as name, surname, eye color, phone number, or bank account details. Processing of personal data refers to all kinds of operations performed on such data, including collection, modification, recording, storage, deletion, disclosure, and transfer.

Your personal data processed via electronic and printed forms, and the circumstances under which they are processed, are listed below:

- During reservation processes, the Company processes your identity data (Turkish ID number, name, surname, date of birth, place of birth, gender, age, nationality, signature, ID validity date, passport number for foreign nationals, foreign ID number, passport validity date), contact data (phone number, email address, address), and customer transaction data (reservation number, check-in date, check-out date, call center records, accommodation preferences).
- For invoicing and payment processes, the Company processes your identity data (Turkish ID number, name, surname) financial data (invoice number, financial account number).).
- In the event that you submit your requests and complaints through our call center, website, or WhatsApp communication line, the Company processes your customer transaction data (voice recordings, the information you provide in your requests and complaints, and log records) and contact data (phone number, email address).
- During your physical visits, CCTV recordings are processed for the purpose of ensuring the security of physical premises.
- If you enter the hotel premises with a vehicle, your vehicle data (license plate information) is processed.
- In case of emergencies, if your children use the Kids Club or if you declare any illness or allergies during the reservation process, your health data (health information, allergen information) is processed.
- In the event of a legal dispute, your legal transaction information (information contained in correspondence with judicial and administrative authorities, and information contained in litigation/enforcement files) may be processed for use in judicial and administrative proceedings.
- If you provide consent for commercial electronic communications, your identity, contact, and customer transaction data are processed for the purpose of sending you campaign, promotional, and marketing communications.
- If you provide your explicit consent, your customer transaction data and marketing data may be processed for the purposes of personalizing, improving, and enhancing your service experience; conducting profiling and analysis activities; developing our services in line with your needs and preferences; measuring the effectiveness of our marketing activities; and determining our marketing strategies.

2. Purposes and Legal Grounds for Processing Your Personal Data

Your collected personal data is processed based on the legal grounds of necessity for the establishment and/or performance of a contract, fulfillment of our legal obligations as the data controller, and necessity for the establishment, exercise, or protection of a right and expressly provided for by law. Your personal data processed within the scope of our marketing and promotional activities are processed based on your explicit consent as the legal basis. The purposes for processing your personal data in compliance with the law and principles of good faith include:

- Execution of emergency management processes
- Execution of activities in compliance with legislation
- Execution of finance and accounting operations

- Execution of loyalty processes for company / products / services
- Ensuring physical environment security
- Execution of communication activities
- Execution / audit of business activities
- Receiving and evaluating suggestions for the improvement of business processes
- Execution of goods / services sales processes
- Execution of post-sales support services for goods / services
- Execution of customer relationship management processes
- Execution of activities for customer satisfaction
- Execution of marketing analysis studies
- Execution of advertising / campaign / promotion processes
- Tracking of requests / complaints
- Ensuring the security of movable assets and resources
- Execution of product / service marketing processes
- Execution of loyalty processes for company / products / services
- Execution of management activities
- Creation and tracking of visitor records

3. Recipient Groups to Whom Your Personal Data is Transferred and Transfer Purposes

Your personal data may be transferred to domestic recipients in line with the legal grounds stated above. In this context:

- To authorized public institutions and organizations for the purposes of providing information, conducting and auditing business activities, and ensuring compliance with legislation,
- To third-party suppliers for the purposes of conducting/auditing business activities, managing finance and accounting processes, carrying out sales processes of goods/services and execution of post-sales support services for services

4. Retention Period of Your Personal Data

Your personal data is retained for the period specified in the relevant legislation or as required by the purposes of processing. Once the legal grounds requiring data processing cease to exist, your data will be deleted, destroyed, or anonymized either ex officio or upon your request.

5. Your Rights Regarding Your Personal Data

The data subject refers to real persons whose personal data is processed. As a data subject, you may submit your requests within the scope of Article 11 of the KVKK regarding your processed personal data by using the application form available on our website:

- By sending it with your wet signature and a copy of your ID to: Rüzgarlıbahçe Mah. Kumlu Sk. C Blok Önder Plaza No: 3 İç Kapı No: 3 Beykoz / İstanbul ("*Company address*"),
- By submitting it in person with a valid ID,
- By signing with a secure electronic signature or mobile signature and sending it to kvkk@aksa.com.tr.

To ensure that we can process your request effectively, you must clearly and explicitly state which right you wish to exercise and provide detailed information regarding your request.

Please note that the request must relate to the applicant personally. If an application is made on behalf of another person, the applicant must have specific documented authorization (power of attorney). Unauthorized applications will not be evaluated.

6. Evaluation of Your Application

We will evaluate your application and respond as soon as possible, and at the latest within 30 days from the date your request is received by us.