

**DISCLOSURE FORM FOR GUESTS**  
**AS PER**  
**THE PERSONAL DATA PROTECTION LAW NO. 6698 (PDPL)**

This Disclosure Form is intended to ensure that guests of **Elit Turizm Yatırım A.Ş.(Data Controller)** who resides at Kocatepe Mahallesi, Şehit Muhtar Caddesi No:40 Taksim / Istanbul meet the disclosure requirements as provided for in the Personal Data Protection Law No. 6698 (PDPL) and other applicable regulations. Our company's personal data protection policies are available at <https://www.eliteworldhotels.com.tr/kisisel-verileri-koruma-politikasi.aspx> .

**A. METHOD FOR COLLECTING PERSONAL DATA**

Personal data are collected from guests staying at our hotel through written text, email, phone, verbal conversation or digital systems. Such personal data is processed to the extent as provided in this Disclosure Form. According to Article 3 of PDPL, **processing** means any operation which is performed on personal data such as recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, and classification.

**B. PURPOSE AND LEGAL GROUNDS OF PROCESSING OF PERSONAL DATA**

Your personal data processed by us, i.e. data controller, including purpose and legal grounds of processing of such personal data, are detailed in the tables below.

Legal Grounds	Data Category	Personal Data	Purpose of Processing
Forming and executing a contract	Financial Data	Bank Account Information, Financial Performance Information, IBAN / Account No, Credit Card Details/Bank Account Details, Payment Details	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Executing/Inspecting Work Activities, Executing Goods/Service Sale Processes, Executing Storage and Archive Operations
Forming and executing a contract	Communication Data	Address, Email, Residential Address, Phone Number	Executing Financial and Accounting Works, Executing Communication Operations, Executing/Inspecting Work Activities, Executing Goods/Service Post-sale Support Services, Executing Goods/Services Sale Processes, Executing Goods/Service Production and Operation Processes, Executing Goods/Services Sale Processes, Executing Customer Relations Management Processes, Executing Activities Aimed At Customer Satisfaction, Executing Storage and Archive Operations, Executing Contract Processes, Tracking of Requests/Complaints, Reporting to Authorized Persons, Bodies and Organizations

Forming and executing a contract	Identification Data	Name and Surname, Accompanying Person's Full Name, Date of Birth, Driver's License, Passport/Turkish ID Number, Signature, Nationality	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Executing Communication Operations, Executing/Inspecting Work Activities, Executing Goods/Services Sale Processes, Executing Goods/Service Production and Operation Processes, Executing Goods/Services Sale Processes, Executing Customer Relations Management Processes, Executing Activities Aimed At Customer Satisfaction, Presenting Food According to Customer's Meal Preferences, Executing Storage and Archive Operations, Executing Contract Processes, Tracking Requests/Complaints, Reporting to Authorized Persons, Bodies and Organizations
Forming and executing a contract	Customer Processing Data	Date of Stay, Mile Number, Room Type Preference, Meal Preference	Executing Goods/Service Post-sale Support Services, Executing Goods/Services Sale Processes, Executing Activities Aimed At Customer Satisfaction, Tracking Requests/Complaints, Reporting to Authorized Persons, Bodies and Organizations, Executing/Inspecting Work Activities, Executing Goods/Service Sale Processes, Executing Goods/Service Production and Operation Processes, Presenting Food According to Customer's Meal Preferences
Performing the Statutory Obligation of the Data Controller	Financial Data	Bank Account Information, Invoice Details, IBAN / Account No, Credit Card Details	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Executing/Inspecting Work Activities, Executing Goods/Service Sale Processes, Reporting to Authorized Persons, Bodies and Organizations
Performing the Statutory Obligation of the Data Controller	Physical Place Security Data	Vehicle Registration Number	Following and Implementing Legal Procedures
Performing the Statutory Obligation of the Data Controller	Communication Data	Email, GSM Number, Phone Number	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Tracking and Executing Legal Works, Reporting to Authorized Persons, Bodies and Organizations
Performing the Statutory Obligation of the Data Controller	Identification Data	Address, Name and Surname, Copy of Driver's License, Signature, Copy of Identification, Passport, Copy of Permit, Turkish ID Number, Passport Number, Nationality	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Tracking and Executing Legal Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Storage and Archive Operations, Ensuring the Security of the Data Controller Operations, Reporting to Authorized Persons, Bodies and Organizations
Performing the Statutory Obligation of the Data Controller	Customer Processing Data	Order Details, Request Information	Executing Financial and Accounting Works, Reporting to Authorized Persons, Bodies and Organizations

Legitimate Interest of the Data Controller	Financial Data	Financial Performance Information, IBAN / Account No	Executing Financial and Accounting Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Goods/Service Sale Processes
Legitimate Interest of the Data Controller	Physical Place Security Data	Vehicle Registration Number	Ensuring Physical Place Security
Legitimate Interest of the Data Controller	Communication Data	Address, Email Address, Phone Number	Executing Financial and Accounting Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Goods/Service Sale Processes, Executing Customer Relations Management Processes, Tracking of Requests/Complaints
Legitimate Interest of the Data Controller	Identification Data	Name and Surname, Nickname, Turkish ID Number	Executing Financial and Accounting Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Goods/Service Sale Processes, Executing Customer Relations Management Processes, Executing Activities Aimed at Customer Satisfaction, Tracking of Requests/Complaints
Legitimate Interest of the Data Controller	Customer Processing Data	Date of Stay	Executing Customer Relations Management Processes, Tracking of Requests/Complaints
Legitimate Interest of the Data Controller	Marketing Data	Satisfaction Survey Questions	Executing/Inspecting Work Activities, Obtaining and Evaluating Recommendations to Improve Work Processes, Executing Customer Relations Management Processes, Executing Storage and Archive Operations

### C. TO WHOM PERSONAL DATA CAN BE TRANSFERRED AND FOR WHAT PURPOSE

Our Company takes utmost care to process personal data in line with the “need-to-know” and “need-to-use” principles, with required data minimization, technical and executive safety measures in place. Your personal data is processed within the framework of the terms and conditions for processing of personal data and purposes as specified in Article 8 and 9 of PPDL and only transferred to the third persons in the following circumstances.

Recipient / Group of Recipients	Purpose of Transfer	Transferred Data
Business Partners (THY)	Executing Promotional Processes	Customer Processing Data (Mile Number)
Financial Advisor / Legal Department if required, Independent Inspection Company, CPA	Fulfillment of Statutory Obligations	Financial Data (Account Details, IBAN/Account No), Communication Data (Email Address, GSM No), Identification Data (Name and Surname, Signature, Turkish ID Number)
Financial Advisor, Internal Lawyer	Fulfillment of Statutory Obligations	Financial Data (Account Details, IBAN/Account No), Communication Data (Address, Email Address, Phone Number), Identification Data (Address, Name and Surname, Signature, Turkish ID Number/Passport No) Customer Processing Data (Order Details, Request Information)
Insurance Company, Internal Lawyer	Executing Insurance Processes, if required	Physical Place Security Data (Vehicle Registration Number), Communication Data (Email Address, Phone Number), Identification Data (Name and Surname, Copy of Driver's License, Signature, Copy of Identification, Copy of Permit)
Authorized State Institutions and Organizations, Insurance Company, Internal Lawyer	Executing Insurance Processes, Fulfillment of Statutory Obligations	Physical Place Security Data (Vehicle Registration Number), Communication Data (Email Address, Phone Number), Identification Data (Name and Surname, Copy of Driver's License, Signature, Copy of Identification, Copy of Permit)

Authorized State Institutions and Organizations	Fulfillment of Reporting Duties to the Police	Identification Data (Name and Surname, Turkish ID Number), Customer Processing Data (Date of Stay)
Authorized State Institutions and Organizations	Fulfillment of Statutory Obligations	Identification Data (Name and Surname, Nationality)

#### D. RIGHTS OF RELATED PERSON and METHOD TO EXERCISE THEIR RIGHTS

Pursuant to Article 11 of PDPL No. 6698, everyone is entitled to file an application to our Company acting as a data controller for the following:

(1) Each person has the right to request to the data controller about him/her:

- a) to learn whether his/her personal data are processed or not;
- b) to demand for information as to if his/her personal data have been processed;
- c) to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose;
- d) to know the third parties to whom his personal data are transferred in country or abroad;
- e) To request rectification in the case that personal data is processed incompletely or inaccurately;
- f) to request the erasure or destruction of his/her personal data under the conditions referred to in Article 7 hereof;
- g) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom his/her personal data have been transferred;
- h) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems; and
- i) to claim compensation for the damage arising from the unlawful processing of his/her personal data.

#### Applications related to your foregoing rights:

- As the data subject, you can duly complete an **Application Form** available at [https://www.eliteworldhotels.com.tr/Resources/CKEditor/TextContent/FtDescriptionHtml/2019-12-26@16-28-58-925\\_ElitTurizmYatirimA.SBasvuruFormu.pdf](https://www.eliteworldhotels.com.tr/Resources/CKEditor/TextContent/FtDescriptionHtml/2019-12-26@16-28-58-925_ElitTurizmYatirimA.SBasvuruFormu.pdf), and send it **in writing** to our Company;
- **From email address registered in Our Company systems, together with the identification details, to [kvkk@eliteworldhotels.com.tr](mailto:kvkk@eliteworldhotels.com.tr), or**
- **Through other methods as determined by the Committee**

to our Company. Depending on the nature of your request, your applications will be finalized as soon as possible but not later than thirty days. However, if the process requires additional costs, we reserve the right to charge you according to the tariffs determined by the Personal Data Protection Committee.

Pursuant to Article 4 of the Communiqué on the Procedures and Principles of Application to the Data Controller, titled "Right of Application", natural persons whose personal data are processed have the right to apply to the data controller. Relevant persons may use this right provided that they make their applications in Turkish.

**DISCLOSURE FORM FOR GUARDIANS OF MINOR GUESTS  
AS PER  
THE PERSONAL DATA PROTECTION LAW NO. 6698 (PDPL)**

This Disclosure Form is intended to ensure that guardians of minor guests of **Elit Turizm Yatırım A.Ş.(Data Controller)** who resides at Kocatepe Mahallesi, Şehit Muhtar Caddesi No:40 Taksim / Istanbul meet the disclosure requirements as provided for in the Personal Data Protection Law No. 6698 (PDPL) and other applicable regulations. Our company's personal data protection policies are available at <https://www.eliteworldhotels.com.tr/kisisel-verileri-koruma-politikasi.aspx>.

**A. METHOD FOR COLLECTING PERSONAL DATA**

Personal data of our **minor** guests and their guardians are collected through written text, email, phone, verbal conversation or digital systems. Such personal data is processed to the extent as provided in this Disclosure Form. According to Article 3 of PDPL, **processing** means any operation which is performed on personal data such as recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, and classification.

**B. PURPOSE AND LEGAL GROUNDS OF PROCESSING OF PERSONAL DATA**

Your personal data processed by us, i.e. data controller, including purpose and legal grounds of processing of such personal data, are detailed in the tables below.

Legal Grounds	Data Category	Personal Data	Purpose of Processing
Forming and executing a contract	Financial Data	Bank Account Information, Financial Performance Information, IBAN / Account No, Credit Card Details/Bank Account Details, Payment Details	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Executing/Inspecting Work Activities, Executing Goods/Service Sale Processes, Executing Storage and Archive Operations
Forming and executing a contract	Communication Data	Address, Email, Residential Address, Phone Number	Executing Financial and Accounting Works, Executing Communication Operations, Executing/Inspecting Work Activities, Executing Goods/Service Post-sale Support Services, Executing Goods/Services Sale Processes, Executing Goods/Service Production and Operation Processes, Executing Goods/Services Sale Processes, Executing Customer Relations Management Processes, Executing Activities Aimed At Customer Satisfaction, Executing Storage and Archive Operations, Executing Contract Processes, Tracking of Requests/Complaints, Reporting to Authorized Persons, Bodies and Organizations

Forming and executing a contract	Identification Data	Name and Surname, Accompanying Person's Full Name, Date of Birth, Driver's License, Turkish ID Number, Signature/Passport No, Nationality	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Executing Communication Operations, Executing/Inspecting Work Activities, Executing Goods/Services Sale Processes, Executing Goods/Service Production and Operation Processes, Executing Goods/Services Sale Processes, Executing Customer Relations Management Processes, Executing Activities Aimed At Customer Satisfaction, Presenting Food According to Customer's Meal Preferences, Executing Storage and Archive Operations, Executing Contract Processes, Tracking Requests/Complaints, Reporting to Authorized Persons, Bodies and Organizations
Forming and executing a contract	Customer Processing Data	Date of Stay, Mile Number, Room Type Preference	Executing Goods/Service Post-sale Support Services, Executing Goods/Services Sale Processes, Executing Activities Aimed At Customer Satisfaction, Tracking Requests/Complaints, Reporting to Authorized Persons, Bodies and Organizations, Executing/Inspecting Work Activities, Executing Goods/Service Sale Processes, Executing Goods/Service Production and Operation Processes, Presenting Food According to Customer's Meal Preferences
Performing the Statutory Obligation of the Data Controller	Financial Data	Bank Account Information, Invoice Details, IBAN / Account No, Credit Card Details	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Executing/Inspecting Work Activities, Executing Goods/Service Sale Processes, Reporting to Authorized Persons, Bodies and Organizations
Performing the Statutory Obligation of the Data Controller	Communication Data	Email, GSM Number, Phone Number	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Tracking and Executing Legal Works, Reporting to Authorized Persons, Bodies and Organizations
Performing the Statutory Obligation of the Data Controller	Identification Data	Address, Name and Surname, Copy of Driver's License, Signature, Copy of Identification, Passport, Copy of Permit, Turkish ID Number, Passport Number, Nationality	Executing Operations in Compliance with the Legislation, Executing Financial and Accounting Works, Tracking and Executing Legal Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Storage and Archive Operations, Ensuring the Security of the Data Controller Operations, Reporting to Authorized Persons, Bodies and Organizations
Performing the Statutory Obligation of the Data Controller	Customer Processing Data	Order Details, Request Information	Executing Financial and Accounting Works, Reporting to Authorized Persons, Bodies and Organizations
Legitimate Interest of the Data Controller	Financial Data	Financial Performance Information, IBAN / Account No	Executing Financial and Accounting Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Goods/Service Sale Processes

Legitimate Interest of the Data Controller	Communication Data	Address, Email Address, Phone Number	Executing Financial and Accounting Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Goods/Service Sale Processes, Executing Customer Relations Management Processes, Tracking of Requests/Complaints
Legitimate Interest of the Data Controller	Identification Data	Name and Surname, Nickname, Turkish ID Number	Executing Financial and Accounting Works, Executing Internal Inspection/Investigation/Intelligence Operations, Executing Goods/Service Sale Processes, Executing Customer Relations Management Processes, Executing Activities Aimed At Customer Satisfaction, Tracking of Requests/Complaints
Legitimate Interest of the Data Controller	Customer Processing Data	Date of Stay	Executing Customer Relations Management Processes, Tracking of Requests/Complaints
Legitimate Interest of the Data Controller	Marketing Data	Satisfaction Survey Questions	Executing/Inspecting Work Activities, Obtaining and Evaluating Recommendations to Improve Work Processes, Executing Customer Relations Management Processes, Executing Storage And Archive Operations
Forming and executing a contract	Legal Process Data	Notarized Consent for Persons Under the Age of 18	Executing Operations in Compliance with the Legislation, Executing Storage And Archive Operations

### C. TO WHOM PERSONAL DATA CAN BE TRANSFERRED AND FOR WHAT PURPOSE

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Financial Advisor, Internal Lawyer	Fulfillment of Statutory Obligations	Financial Data (Account Details, IBAN/Account No), Communication Data (Address, Email Address, Phone Number), Identification Data (Address, Name and Surname, Signature, Turkish ID Number/Passport No) Customer Processing Data (Order Details, Request Information)
Authorized State Institutions and Organizations	Fulfillment of Reporting Duties to the Police	Identification Data (Name and Surname, Turkish ID Number), Customer Processing Data (Date of Stay)
Authorized State Institutions and Organizations	Fulfillment of Statutory Obligations	Identification Data (Name and Surname, Nationality)

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- c) to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose;
- d) to know the third parties to whom his personal data are transferred in country or abroad;
- e) To request rectification in the case that personal data is processed incompletely or inaccurately;
- f) to request the erasure or destruction of his/her personal data under the conditions referred to in Article 7 hereof;
- g) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom his/her personal data have been transferred;
- h) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems; and
- i) to claim compensation for the damage arising from the unlawful processing of his/her personal data.

**Applications related to your foregoing rights:**

- As the data subject, you can duly complete an **Application Form** available at [https://www.eliteworldhotels.com.tr/Resources/CKEditor/TextContent/FtDescriptionHtml/2019-12-26@16-28-58-925\\_ElitTurizmYatirimA.SBasvuruFormu.pdf](https://www.eliteworldhotels.com.tr/Resources/CKEditor/TextContent/FtDescriptionHtml/2019-12-26@16-28-58-925_ElitTurizmYatirimA.SBasvuruFormu.pdf), and send it **in writing** to our Company;
- **From email address registered in Our Company systems, together with the identification details, to [kykk@eliteworldhotels.com.tr](mailto:kykk@eliteworldhotels.com.tr), or**
- **Through other methods as determined by the Committee**

**to our Company. Depending on the nature of your request, your applications will be finalized as soon as possible but not later than thirty days. However, if the process requires additional costs, we reserve the right to charge you according to the tariffs determined by the Personal Data Protection Committee.**

**Pursuant to Article 4 of the Communiqué on the Procedures and Principles of Application to the Data Controller, titled "Right of Application", natural persons whose personal data are processed have the right to apply to the data controller. Relevant persons may use this right provided that they make their applications in Turkish.**