



**ELITE WORLD**  
**PERSONAL DATA PROTECTION POLICY**

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## 1. PURPOSE OF THE POLICY

It aims to fulfil the requirements for compliance with the relevant legislation and to establish a data protection and processing policy in international standards with the awareness on the importance of the privacy of the personal data obtained within the scope of the Protection of Personal Data Law No. 6698 (PPDL) by our company in the capacity of data controller.

Our Company's Personal Data Protection Policy ("Policy") and the legal compliance adopted by our Company in the protection and processing of personal data is demonstrated within the scope of honesty and clarity principles. Also in the Policy, information on the purposes of our Company for processing personal data, personal data collection management, legal purpose, to whom the data can be transferred to and the reasons for such transfer as well as the application methods are provided.

## 2. DEFINITIONS

<b>Anonymization</b>	: Making personal data unable to be related with an identified or identifiable natural person under no circumstances, even by matching with other data
<b>Clarification Text</b>	: The explanation made to the data subject on how long the personal data shall be stored and for what purpose, how it is stored and whether it shall be shared with 3rd parties
<b>Ministry</b>	: Directorate of Personal Data Protection Authority
<b>Inventory</b>	: The inventory which is established by data controllers by associating the personal data processing activities they carry out based on business processes with the personal data processing purposes, data category, transferred recipient group and data subject group, which they detail by explaining the maximum period required for the processing purposes, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security
<b>Data Subject</b>	: The natural person whose data is being processed
<b>Destruction</b>	: Deletion, erasure or anonymization of personal data
<b>Processing</b>	: Any operation which is performed upon personal data such as recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization pursuant to Article 3 of PPDL
<b>Law/PPDL</b>	: Personal Data Protection Law
<b>Personal Data</b>	: Any information regarding an identified or identifiable natural person. For example; name-surname, TR ID No., e-mail, address, date of birth, bank account number etc. Therefore the processing of data regarding legal persons are not covered within the scope of PPDL.

<b>Processing of Personal Data</b>	:	All kinds of processes regarding data including obtaining, saving, storing, keeping, altering, rearranging, disclosing, transferring, taking over, making available, classifying personal data or prevention of using the same through ways which are completely or partially automatic or through manual ways provided that they are part of a data registry system
<b>Board</b>	:	Personal Data Protection Board
<b>Authority</b>	:	Personal Data Protection Authority
<b>Special Category Sensitive Personal Data</b>	:	Data related to race, ethnical origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, association, foundation or union membership, health, sexual orientation, criminal conviction and security measures as well as biometric and genetical data
<b>VERBIS</b>	:	Information system established and governed by the Directorate which can be accessed via the Internet and which shall be used by data controllers for Registry applications and other transactions related to Registration
<b>Data Processor</b>	:	The natural or legal person authorized by the data controller to process personal data on behalf of them
<b>Data Controller</b>	:	The natural or legal person who is in charge of the installation and administration of data recording system and who determines the objectives and the instruments of personal data processing
<b>Data Controllers' Registry</b>	:	The Data Controllers' Registry held by the Directorate
<b>Data Controller Contact Person</b>	:	The natural person specified by the data controller during the registration to the Registry for communications with the Authority in relation to the obligations of the legal persons located in Turkey as well as the data controller representatives of legal persons who are not located in Turkey within the scope of the Law and the secondary arrangements to be enacted regarding this Law
<b>Deletion</b>	:	Deletion of personal data as well as the procedure to make the personal data inaccessible and non-reusable for the relevant users
<b>Erasure</b>	:	Erasure of personal data as well as the procedure to make the personal data inaccessible, non-recoverable and non-reusable for anyone

### 3. ESSENTIAL PRINCIPLES OF PERSONAL DATA PROCESSING

Our Company meets the requirements of the essential principles specified in the legislation in relation to the protection and processing of personal data and acts in accordance with the principles below in order to ensure that the personal data is processed in accordance with the Constitution and the PPDL.

### **3.1. Prohibition of Personal Data Processing as a Rule**

Knowing that the processing of personal data is prohibited as a rule, the Company processes personal data based on the purposes below only within the boundaries foreseen by the legislation:

#### **a. Obtaining the Explicit Consent of the Personal Data Subject**

One of the conditions for personal data protection is the explicit consent of the data subject. The explicit consent of the personal data subject must be explained on a specific subject and based on information and free will. Data is processed within the scope of the explicit consent of the data subject and for the purposes specified in the explicit consent. As a rule; in the presence of conditions specified in clauses b, c, d, e, f, g and h of this article, the explicit consent of the data subject is not required to be obtained.

#### **b. Explicitly Foreseen in the Law**

In the event it is explicitly foreseen in the law, the personal data of the data subject is processed lawfully. In circumstances where data processing is not allowed in the laws, data is processed limited to the reason and data categories specified in the relevant law.

#### **c. Failure to Obtain the Explicit Consent of the Data Subject due to Actual Impossibility**

Where it is mandatory to process the personal data in order to protect the life or bodily integrity of a person or another person, the personal data of a data subject whose explicit consent cannot be given due to actual impossibility or whose consent cannot be validated can be processed.

#### **d. Direct Relation to the Execution of or Performance under the Contract**

In the event it is necessary to process personal data regarding the parties of a contract (provided that the person whose data shall be processed based on the execution of or performance under the contract is one of the parties to the contract), provided that it is directly related to the execution of or performance under the contract, the personal data may be processed.

#### **e. Fulfilling a Legal Obligation**

In the event data processing is mandatory for the Company to fulfil its legal obligations, the Company may process the personal data of the data subject.

#### **f. Publicity of Personal Data by the Personal Data Subject**

In the event the data subject makes his personal data subject himself, the relevant personal data may be processed limited to the aim of publicizing.



### **g. In the event it is Mandatory to Process Data for Establishing or Protection of a Right**

In the event data processing is mandatory for establishing, using or protecting a right, the personal data of the data subject can be processed.

### **h. In the event it is Mandatory to Process Data for Legitimate Interests**

Provided that processing does not harm the fundamental rights and freedoms of the personal data subject, the personal data of the data subject can be processed if it is mandatory for the legitimate interests of our Company.

In the event the processed data is special category data, as specified in the PPDL, and if the explicit consent of the data subject is not obtained, the personal data can only be processed in circumstances below provided that adequate measures to be determined by the Board are taken:

#### **3.2. Compliance to the Law and the Rule of Honesty**

Our Company processes the personal data in accordance with the law and the rule of honesty pursuant to the Article 4 of PPDL and aims to balance the conflicting interests by considering “rightful interests”. Clarity and honesty are taken as basis in the clarification, clear information is given about the purpose of use of the personal data collected and the data is processed in this framework.

#### **3.3. Commitment to Purpose, Limitedness and Proportionality**

Our Company determines the purposes of processing the data of the data subject within the direction of his explicit consent. In this context, our Company proportionally avoids processing of personal data that is not related to the purpose of processing or unnecessary data and the data necessary during data processing activities is collected at a minimum level.

#### **3.4. Making sure that the Personal Data is Accurate and Up to Date when Necessary**

Our Company makes sure that the personal data it processes is accurate, it respects the statements of the data subject and receives confirmation regarding its up to dateness when necessary.

#### **3.5. Processing Personal Data with Specific, Explicit and for Legitimate Purposes**

Our Company collects and processes personal data with legitimate and lawful purposes. Our Company processes personal data to the extent necessary in a reasonable framework and in accordance with the activities it carries out. The personal data is stored as long as the period foreseen in the legislation or as necessary for the purposes it is processed.

#### **3.6. Data Safety Principle**

In consideration of the development speed of technology, our Company is aware that the safety of your data is not limited to legal methods and that technology-supported methods are also important. In this framework, it aims to take all necessary measures in order to ensure data safety.

## **4. DATA SUBJECTS WHOSE PERSONAL DATA IS OBTAINED**

PPDL refers Data Subject to as the person whose personal data is obtained. Within the scope of the activities of our Company, the personal data of the persons below are obtained and processed in accordance with the legislation.

<b>Employee Candidate</b>	:	The person interviewed for employment
<b>Intern</b>	:	High School or University students in their legal internship process
<b>Employee</b>	:	A person working in our Company under a labor contract
<b>Extra Personnel</b>	:	A person providing services through intermediary companies according to the need within the scope of temporary employment
<b>Individual Customer/Guest</b>	:	A natural person who benefits from our services
<b>Potential Customer/Guest</b>	:	Natural persons who are or may be interested in the products and services of our Company.
<b>Corporate Customer</b>	:	A legal person who benefits from our services
<b>Intermediary Company Official, Shareholder, Employee</b>	:	Officials, shareholders, employees of domestic and foreign intermediary companies who support the sales of our services
<b>Supplier and Business Partner Official, Shareholder, Employee</b>	:	Shareholders, employees and officials of institutions which our company has any kind of business relation.
<b>Subcontractor</b>	:	Contracting companies which our company has any kind of business relation,
<b>Visitor</b>	:	Natural persons who have visited our locations or visited the website of our Company.
<b>Third Parties</b>	:	Natural persons (family members, emergency contact persons, relatives, etc.) whose personal data are processed by our Company in accordance with our legal obligations or company procedures.

## 5. PERSONAL DATA COLLECTION CHANNELS

The personal data of persons specified in the Article 4 of this Policy can be collected through automated, non-automated or similar means verbally, written or electronically. In this context, personal data obtaining channels are given below.

<b>Live Chat</b>	:	The questions and requests of natural persons communicating through this module in our corporate website are responded.
<b>Pre-Booking</b>	:	Refers to meeting the reservation demands of the guests for a certain period for the provision of accommodation and organization services at the hotel.
<b>Booking</b>	:	Refers to meeting the reservation demands of the guests against payment for accommodation and organization services at the hotel.
<b>Website Booking Module</b>	:	The module that allows online booking through the website of the facility for the provision of accommodation services to our Guests at our Hotel.

<b>Website Meeting Portal/Online Meeting Portal</b>	:	The portal that allows our Guests to communicate Meeting organization requests while allowing online reservations through the panel.
<b>Landing Page</b>	:	It is the form populating process for wedding ceremonies, henna night organizations and Fit Life services through the micro websites under <a href="https://www.eliteworldhotels.com.tr/">https://www.eliteworldhotels.com.tr/</a> domain for the provision of information and offers to the guest regarding services.
<b>Agency</b>	:	The process of the presentation / realization of hotel services with the requests received through the agency
<b>Online Agency</b>	:	Online Travel Agencies (Booking.com, Expedia etc.) and the platform usages of these websites (Extranet Usage)
<b>Corporate Company</b>	:	The process of the presentation / realization of hotel services with the requests received through corporate companies
<b>Elite World Club Card</b>	:	Realization of membership procedures within the scope of Elite World loyalty program through the website or by populating a printed application form
<b>Instagram, Facebook, Twitter, LinkedIn</b>	:	For communication through social media
<b>Newsletter Membership</b>	:	The Newsletter Membership in which the products and services are introduced trough <a href="https://www.eliteworldhotels.com.tr/">https://www.eliteworldhotels.com.tr/</a> domain.
<b>Website / Communication Forms</b>	:	Aims to provide information requested by populating the forms in <a href="https://www.eliteworldhotels.com.tr/">https://www.eliteworldhotels.com.tr/</a> domain / to provide the information requested by the Guests regarding all services on the website.
<b>Website Restaurant Booking forms</b>	:	Aims to respond to the restaurant booking requests communicated by the guests through <a href="https://thegrillocakbasi.com.tr/">https://thegrillocakbasi.com.tr/</a> domain.
<b>CCTV Footages</b>	:	By recording CCTV footages inside and outside the hotel buildings for safety purposes
<b>Use of Cookies</b>	:	Website data flow monitoring by using website cookies
<b>HotSpot</b>	:	Usage of WiFi / Wireless Internet network by our guests who accommodates or does not accommodate
<b>Selection and Placement Process</b>	:	The process for selection and placement for employment purposes
<b>Recruitment Process</b>	:	Execution and performance of the labor contract with Employee candidates whose selection and placement process is approved
<b>Extra Personnel Employment Process</b>	:	Temporary personnel employment through intermediaries when necessary
<b>Elite World Portal</b>	:	The portal is an in-house platform in order to inform employees about the system and management and fulfill their needs.



<b>Execution and Performance Process of Contracts with Suppliers and Business Partners</b>	:	Service and product supply process for the continuity of commercial activities
<b>Renting Process</b>	:	Renting the office areas owned by our Company to natural persons

## 6. PERSONAL DATA USAGE PURPOSES

### a) Workforce planning and meeting the employment needs

The personal data obtained during the interviews held for employment purposes are processed based on the result of the interviews.

In the event the candidate is not suitable for the interviewed position, however is suitable for another duty and/or to evaluate for future positions, provided that “consent” is given by the Candidate, the personal data of the Candidate is stored in the résumé bank held by our Company and retained to be used in employment needs and otherwise they are destroyed.

### b) Recruitment and the execution and performance of labor contracts

The personal data shared by the Employee with the Company during the interviews held, including the labor contract execution process and following the execution of the labor contract are processed in the personal file of the employee and in the systems where the rights and interests of the employee are monitored.

### c) Fulfilling the contractual obligations,

For the performance of the contracts executed with suppliers, business partners, tenants, corporate and individual customers/guests and other parties, personal data obtained from these parties are processed in organizational and operational processes and by entering the necessary records in the relevant systems.

### d) Conducting Customer / Guest relations

The personal data obtained from Guests who have communicated with our Company or made a booking through the channels specified in this Policy in order to receive services, accommodated and/or received our other services and the Corporate Customers who have communicated with our Company in order for their employees, shareholders and/or guests to benefit from the services rendered by our Company, made a booking, purchasing these services for such third parties are processed in order to ensure that the services within the main area of activity of our Company are performed.

### e) Management of guest satisfaction and complaint processes

In terms of hotel services, which is the main area of activity of our Company, guest satisfaction is of a great importance. The personal data obtained through the Customer satisfaction and complaint processes established within our Company are anonymized and used in order to improve the processes subject to complaints.

### f) Planning and implementation of marketing activities

By obtaining the Authorized Database Registration Consent which contains the necessary contents from data subjects in platforms where personal data is received by our Company; targeted marketing practices are conducted by sending electronic commercial messages from channels that they allow, based on the preferences of guests and potential guests.

**g) Keeping Personal Data accurately and up to date**

As per the obligation of Data Controllers to keep personal data accurate and up to date pursuant to the Article 4 of PPDL; communication is made with the Data Subject in order to update this data, in order to keep the personal data obtained from him accurate and up to date.

**h) Creating and monitoring Guest Registrations in Entries and Exits**

In order for the provision of general and commercial security of our facilities and establishments by our Company, the records of employees and other data subjects are recorded in the visitor books in accordance with the essential principles foreseen in PPDL and also specified in this Policy and these records are stored securely physically or electronically for a period suitable for their processing purposes and are destroyed in accordance with our Company's Storage and Destruction Policy.

**i) Creating records via CCTV in order to ensure safe entry and exit and present when requested by legal authorities**

In order for the provision of general and commercial security of our facilities and establishments by our Company, the images of visitors, employees and other data subjects are recorded in accordance with the essential principles foreseen in PPDL and also specified in this Policy and these records are stored securely physically or electronically for a period suitable for their processing purposes.

In places where images are recorded, a warning is placed that images are recorded to inform the data subjects. Within the scope of the activities in question, our Company acts in compliance with the obligations foreseen in all relevant legislations, especially PPDL, regarding the protection of personal data. No images are recorded in places within the boundaries of our company where both the nature of the service provided and the general privacy is high.

**j) Fulfillment of legal obligations**

Identity details of each guest accommodating in our hotels in terms of Hotel services, which is the main area of activity of our Company are communicated to the relevant Police Station through the ID Notification system. On the other hand; where requested in compliance with the legislation, these are shared with judicial and administrative authorities and the legally authorized public and private institutions and organizations within the scope of obligations arising from the Law.

## **7. TRANSFER OF PERSONAL DATA**

Based on the data subjects and the data input channels, our Company fulfils its obligation to inform and processes data by providing the necessary data minimization and by applying necessary technical and administrative safety measures, in compliance with “need to know” and “need to use” principles. Personal data shall be processed within the framework of the personal data processing conditions and purposes specified in Article 8 and 9 of the PPDL and only shared with the 3rd Parties specified in the relevant clarification text in circumstances below.

## **8. OBLIGATION TO INFORM**



Within the scope of the Article 10 of PPDL, the data subjects must be informed before their personal data is obtained or during the obtaining process at the latest.

Within the framework of such obligation to inform, the information that must be communicated to the data subjects are as follows:

- Identity of the data controller and its representative, if any,
- The purpose of processing the personal data,
- To whom and for what purposes the processed personal data can be transferred,
- Method and legal reason for collecting personal data,
- Other rights specified in Article 11 of PPDL.

In order to fulfil its obligation to inform, our Company has prepared clarification statements based on processes and persons whose data are processed to be presented to data subjects within the scope of the PPDL provision above. In order for our Company to carry out its commercial activities, explicit consent statements have been prepared for the processing activities and data categories which require the explicit consent of the data subject to after the clarification statements are presented to the data subjects.

**Within the scope of the Article 28(1) of PPDL, our Company has an obligation to inform in circumstances below:**

- In the event the personal data of natural persons are processed within the scope of activities related to them or their family members living in the same residence, provided that they are not transferred to third parties and the obligations regarding data safety are complied with,
- In the event the personal data is processed for research, planning and statistics purposes by making them anonymous with official statistics,
- In the event the personal data is processed for artistic, historical, literary or scientific purposes or within the scope of freedom of expression provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime,
- In the event the personal data is processed within the scope of preventive, protective and informative activities carried out by public institutions and organizations authorized by law in order to maintain national defense, national security, public security, public order or economic security,
- In the event personal data is processed for investigation, prosecution, judgment or enforcement procedures by judicial or enforcement authorities.

**Within the scope of the Article 28(2) of PPDL, our Company's obligation to inform shall not apply for circumstances below:**

- In the event the processing of personal data is necessary for the prevention of a crime or a criminal investigation,
- In the event the personal data made public by the data subject himself are processed,
- In the event the processing of personal data is made by authorized public institutions and organizations and professional organizations in the capacity of public institutions based on the authorities granted by law or that are necessary for audit, surveillance, disciplinary investigation or prosecution purposes,
- In the event the processing of personal data is necessary for the protection of economic and financial interests of the Government regarding budgetary, taxative and financial matters.

## 9. RIGHTS OF THE DATA SUBJECT

Pursuant to the Article 11 of PPDL, every person is entitled to apply our Company, as a data controller for the matters below:

1. Learn whether or not her/his personal data have been processed,
2. Request information as to processing if her/his data have been processed,
3. Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose,
4. Know the third parties in the country or abroad to whom personal data have been transferred,
5. Request rectification in case personal data are processed incompletely or inaccurately,
6. Request deletion or destruction of personal data, which have been processed pursuant to the provisions of the PDPL and other related laws but the reasons necessitating their processing cease to exist, ex officio or upon the request of the related person pursuant to the article 7 of the PDPL No. 6698,
7. Request notification of the operations made as per the Articles 5 and 6 of PPDL to third parties to whom personal data have been transferred,
8. Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems,
9. Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

## 10. THE METHOD OF UTILIZATION OF THE RIGHTS BY THE PERSONAL DATA SUBJECT

Pursuant to the paragraph 1 of the article 13 of the PDPL and the Communiqué on Principles and Procedures for Applications Filed to Data Subjects published in the Official Gazette No. 30356 dated 10.3.2018, the applications to be filed to our Company acting as the data controller have to be submitted in writing and with other methods identified by the Personal Data Protection Board (“Board”).

Personal data subject “Related Person” shall notify his/her rights and requests listed in paragraph A to our Company. Accordingly, the related person may file a written application to exercise his/her rights under the article 11 of the Personal Data Protection Law No. 6698,

- In person,
- By post with an attached signature circular,
- Via a notary public,
- With secure electronic signature,
- By sending to the following KEP (Registered E-mail) address upon signing with the secure electronic signature defined to the applicant,
- By sending via the e-mail address of the data subject which has been notified to and registered in the system of the data controller.

### **The application must include the following:**

- Name, surname and in case of a written application, signature,
- TR ID number of the citizens of the Republic of Turkey, nationality, passport number or ID number, if any, for the foreigners,



- Domicile or workplace address used for notifications,
- Electronic mail address, phone and fax number used for notifications, if any,
- Subject of request,
- Information and documents regarding the subject,

For written applications, the date of delivery of the document to the data controller or his/her representative shall be used as the application date.

For applications made via other methods, the date of receipt of the application by the data controller shall be considered as the application date.

Application shall be finalized within the shortest time possible depending on the nature of the request and maximum thirty days without any consideration. However, if the transaction requires a cost, the fee under the tariff set by the Board may be taken as basis.

Applications must be made by the data subject in person. Applications on behalf of another person may be made upon the submission of a power of attorney provided that it includes the content of the information requests under the PDPL. In case of any suspicion regarding the identity of the applicant, our **Company** may request authentication details from the related person.

## 11. CONTACT DETAILS

	<p><b>Title:</b> ELIT TURIZM YATIRIM A.Ş</p> <p><b>Central Registration System Number:</b></p> <p><b>0332012292100016</b></p> <p><b>Contact Link and e-mail address:</b></p> <p><a href="https://www.elitworldhotels.com.tr">https://www.elitworldhotels.com.tr</a></p> <p><a href="mailto:kvkk@elitworldhotels.com.tr">kvkk@elitworldhotels.com.tr</a></p> <p><b>Address:</b> Kocatepe Mahallesi ,Şehit Muhtar Caddesi No:40 Taksim /İstanbul</p>
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## 12. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA

In order to prevent unlawful processing and access of personal data processed by our company and to ensure that personal data are kept securely in accordance with the Article 12 of PPDL, necessary administrative and technical measures are taken and necessary audits are being held or outsources in this regard. While necessary measures in accordance with the nature of the personal data are taken, special category personal data are protected with even stricter safety measures.

### a. Technical Measures

- ✓ The physical platforms in which the personal data are stored are locked and access to these platforms are managed within the scope of **authorization**.
- ✓ The electronic platforms in which the personal data are stored are encrypted and access to these platforms are managed within the scope of **access authorization**.
- ✓ The records of backup records are kept for the destruction of data backup processes in the future.
- ✓ Commitments have been received that the personal data on the servers abroad are protected by taking necessary security measures.
- ✓ Necessary measures were taken within the scope of the practices of our Company in terms of Information Technologies implementations.
- ✓ Our Company employs experienced personnel with adequate knowledge in order to provide data safety and provides its employees with necessary training on the protection of personal data.
- ✓ Carries out necessary internal controls within the scope of systems established.
- ✓ Within the scope of the established systems; data analysis, data classification, IT risk assessment and business impact analysis processes are conducted.
- ✓ Our company carries out or outsources necessary inspections within its own organization in order to ensure the implementation of the provisions of the Law.

#### **b. Administrative Measures**

- ✓ Awareness training on PPDL has been given to the employees and this awareness training was included to the orientation program for each employee.
- ✓ The PPDL Employee Information Guideline which includes our company's practices regarding the protection of personal data and data security in order to raise employees to a level of awareness was prepared and presented to our employees. With this document, the importance of the Personal Data Processing Inventory and the responsibility of Employees for keeping it up to date are reminded and the matters to be taken into consideration in terms of business processes are also mentioned.
- ✓ Our company carries out or outsources necessary inspections within its own organization in order to ensure the implementation of the provisions of the Law.
- ✓ In the event the personal data processed are obtained through illegal means, our Company informs the data subject and the Board immediately.
- ✓ Our Company executes a framework contract with the persons with whom the personal data are shared or ensures data safety with the provisions to be included to the contracts.
- ✓ A Policy for the Protection of Special Category Personal Data was prepared and put into force.
- ✓ Storage and Destruction Policy was prepared and put into force.

### **13.STORAGE OF PERSONAL DATA**

The personal data obtained by our Company are stored securely in a physical or electronic environment in order for our company to carry out its commercial activities. Within the scope of the activities in question; our Company acts in compliance with the obligations foreseen in all relevant legislations, especially PPDL, regarding the protection of personal data.

In case the purposes of processing personal data are terminated except for circumstances where the storage of personal data is permitted or required for a longer period in accordance with the relevant legislation, the data shall be deleted, destroyed or anonymized ex officio by our Company or via the data subject application form at



<https://www.eliteworldhotels.com.tr/kisisel-verileri-koruma-politikasi.aspx> with various techniques to be utilized upon the demands of data subjects.

In the event personal data is deleted through such methods, such data shall be destroyed in a way that they cannot be used or recovered by any means. However, in the event the legitimate interests of the data subject is in question, the personal data can be stored until the expiry of the general statute of limitations period (ten years) specified in the Code of Obligations although the purpose of processing is eliminated and the periods specified in the relevant laws are expired, provided that the basic rights and freedoms of data subjects are not prejudiced. Employee data shall be stored for 15 years within the scope of the Labor Law and Occupational Safety Legislation. Following the expiration of such statute of limitation periods, personal data shall be deleted, destroyed or anonymized according to the aforementioned procedure.

#### **14. TRANSFER OF PERSONAL DATA TO PERSONS IN TURKEY**

Our Company carefully complies with the terms of PPDL, without prejudice to the provisions under other laws regarding the transfer of personal data to third parties.

In this framework, personal data are not transferred to third parties by our Company without the explicit consent of the data subject. However, in the presence of any of the conditions below specified in the PPDL, personal data can be transferred by our Company without obtaining the explicit consent of the data subject:

- In the event it is explicitly foreseen in the laws,
- In the event it is mandatory in order to protect the life or bodily integrity of a person or another person who is unable to provide his explicit consent due to actual impossibility or whose consent cannot be validated can be processed,
- In the event it is necessary to process the personal data of the parties provided that it is directly related to the execution of or performance under a contract,
- In the event it is mandatory for the data controller to fulfil its legal obligation,
- In the event it is made public by the data subject himself,
- In the event it is mandatory to process data for establishing or protection of a right,
- In the event it is mandatory to process data for the legitimate interests of the data controller, provided that the basic rights and freedoms of the data subject are not prejudiced.

In terms of private personal data other than health and sexual life, in the event it is stipulated in laws, provided that necessary measures are taken. In terms of private personal data regarding health and sexual life, the data can be transferred for the purposes below:

- Protection of public health,
- Preventive medicine,
- Medical diagnosis,
- Execution of treatment and healthcare services,
- Your personal data can be transferred without obtaining your explicit consent for purposes such as planning of healthcare services and its funding.

For the transfer of special category personal data, the conditions specified in the processing conditions of these data are complied with.



## **15.TRANSFER OF PERSONAL DATA ABROAD**

Regarding the transfer of personal data abroad, the explicit consent of the data subject is necessary pursuant to the Article 9 of PPDL. However, in the presence of conditions that allow processing of personal data, including special category personal data, without obtaining the explicit consent of the data subject, the personal data can be transferred by our Country without obtaining the explicit consent of the data subject provided that necessary measures are taken in the foreign country where the personal data shall be transferred.

If the country where the personal data shall be transferred is not listed within the countries where necessary measures are taken, our company and the data controller/data processor in the relevant country shall undertake such necessary measures in writing. No data is transferred abroad by our Company without obtaining the explicit consent of the data subject.

## **16.VALIDITY AND IMPLEMENTATION**

This Policy entered into force on 20/01/2020 In the event the entire Policy or its certain articles are updated, the updates become valid as of the date they are announced. The most up to date version of this Policy can be found at <https://www.eliteworldhotels.com.tr> website.

In the event of any inconsistencies between the provisions of PPDL and other relevant legislation and this Policy, PPDL and other relevant legislation shall prevail.