

**ELITE WORLD CLUB MEMBERS INFORMATION DISCLOSURE TEXT  
PURSUANT TO  
PERSONAL DATA PROTECTION LAW NO. 6698 (PDPL)**

This Information Disclosure Text was prepared to be submitted to the Elite World Club members of **Elit Turizm Yatırım A.Ş.**, located at Kocatepe Mahallesi, Şehit Muhtar Caddesi No:40 Taksim /Istanbul, for the purpose of fulfilment of the information disclosure obligation under the Personal Data Protection Law No. 6698 (PDPL) and the relevant legislation. The Policies of our Company on protection of personal data are available on <https://www.eliteworldhotels.com.tr/kisisel-verileri-koruma-politikasi.aspx>.

**A. METHOD OF COLLECTION OF PERSONAL DATA**

Our Company obtains personal data from Elite World Club Members in writing or via our website. These personal data obtained are processed within the scope specified in this information disclosure text. **Processing** activity is defined in Article 3 of the PDPL as the operations of recording, storage, retention, alteration, reorganization, disclosure, transfer, takeover, making available, or classification of the personal data.

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

Your personal data processed by our Company in the capacity of data controller, the purposes of processing of these personal data, and the legal grounds constituting a basis for the processing operation are shown in the following tables in detail.

Legal Ground	Data Category	Personal Data	Purpose of Processing
Conclusion and performance of contract	Contact Data	Address, E-Mail Address, GSM No.	Execution of Company / Product / Service Loyalty Processes, Execution of Communication Activities, Execution of Customer Relations Management Processes, Execution of Activities for Customer Satisfaction, Execution of Contract Processes
Explicit Consent pursuant to Article 9/1 of PDPL	Contact Data	Address, E-Mail Address, GSM No.	Execution of Company / Product / Service Loyalty Processes, Provision of Storage and Archiving Activities
Conclusion and performance of contract	Identity Data	Name-Surname, Gender, Dater of Birth, Signature	Execution of Company / Product / Service Loyalty Processes, Execution of Communication Activities, Execution of Customer Relations Management Processes, Execution of Activities for Customer Satisfaction, Execution of Contract Processes
Explicit Consent pursuant to Article 9/1 of PDPL	Identity Data	Name-Surname, Gender, Dater of Birth, Signature	Execution of Company / Product / Service Loyalty Processes, Provision of Storage and Archiving Activities
Conclusion and performance of contract	Customer Transaction Data	Language Preference	Execution of Company / Product / Service Loyalty Processes, Execution of Communication Activities, Execution of Customer Relations Management Processes, Execution of Activities for Customer Satisfaction, Execution of Contract Processes
Explicit Consent pursuant to Article 9/1 of PDPL	Customer Transaction Data	Language Preference	Execution of Company / Product / Service Loyalty Processes, Provision of Storage and Archiving Activities

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

Our Company pays attention to processing your personal data in accordance with the “need to know” and “need to use” principles, by ensuring the necessary data minimization and by taking the necessary technical and administrative security measures. Your personal data will be processed within the framework of the processing conditions and purposes specified in Articles 8 and 9 of the PDPL, and are transferred only in the following cases and to the specified 3rd Parties.

Recipient / Recipient Groups	Purpose of Transfer	Data Transferred
Business Partners, Suppliers, Competent Public Agencies and Institutions In the Case of Legal Dispute	Execution of Marketing Activities, Execution of Information Provision Activities, Handling and Execution of Legal Affairs	Contact Data (Address, E-Mail Address, GSM No.), Identity Data (Name-Surname, Gender, Date of Birth, Signature), Customer Transaction Data (Language Preference)
TRAVELCLICK INC	Retention of the Data of Customer Loyalty Program's Participants	Contact Data (Address, E-Mail Address, GSM No.), Identity Data (Name-Surname, Gender, Date of Birth), Customer Transaction Data (Language Preference)

### D. RIGHTS OF DATA SUBJECT and METHOD OF EXERCISE OF THE RIGHTS

**Under Article 11 of the PDPL No. 6698, everyone has the right to apply to our Company, acting in the capacity of data controller, for the following issues:**

(1) Everyone has the right to apply to the data controller to:

- a) Learn whether or not their personal data are processed,
- b) Request information on the procedure, if their personal data have been processed,
- c) Learn the purpose of processing of their personal data and whether or not such data are used in accordance with the intended purpose,
- ç) Obtain information on third persons to whom their personal data are transferred domestically or abroad,
- d) Request the correction of their personal data that may have been processed incompletely or inaccurately,
- e) Request the deletion or destruction of their personal data within the framework of the provisions set forth in Article 7 of the Law No. 6698,
- f) Request the communication of the operations carried out pursuant to subparagraphs (d) and (e) to the third persons to whom their personal have been transferred.
- g) Object to the emergence of an outcome that is to the detriment of the data subject as a result of the analysis of their processed data exclusively through automated systems,
- ğ) Request compensation for any loss suffered in the case that their personal data have been processed unlawfully.

**You may submit the applications regarding your rights listed above to our Company:**

- **in writing**, in the capacity of data subject, by duly filling in the **Application Form** available on [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),
- **by sending an e-mail to our email address [kvkk@eliteworldhotels.com.tr](mailto:kvkk@eliteworldhotels.com.tr) by using your e-mail address recorded in the systems of our Company, along with documents evidencing your identity, or**
- **by using other methods determined by the Board.**

**Your applications will be finalized free of charge as soon as possible depending on the nature of your request and within thirty days at the latest; however, in the case that the operation requires any additional cost, you may be requested to pay a fee according to the tariff determined by the Personal Data Protection Board.**

**I received a copy of this Information Disclosure Text about Protection of Personal Data.**