

LUJO HOTEL'S CLARIFICATION TEXT FOR GUESTS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

This clarification is provided in order to keep you informed in compliance with the Law No. 6698 on the Protection of Personal Data ("the Law") enacted with the purpose of protecting the fundamental rights of freedoms of individuals and in particular the right of privacy in particular while processing personal data.

We hereby request your express consent for the processing by. **Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim Şirketi (Company)** of your personal data detailed in this text in accordance with the law and in good faith after the collection thereof through the verbal, written, visual or electronic media under the Law No. 6698 and within the scope of the following purposes and the transfer by the Company of your personal data to the following 3rd parties limited to the purposes for which they are processed where permitted by the legislation, except where it is mandatory to perform the contract and fulfill our legal obligation and where it is explicitly stipulated by the law.

Within the framework of the Law,

Express Consent: A freely-given, specific and informed consent

Personal data: All information related to a real person whose identity is known or could be identified

Processing of personal data: Any kind of transaction performed on personal data such as obtaining, saving, storing, protecting, modifying, editing, describing, transferring, receiving, making available, classifying or blocking the use of the data fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.

1. PERSONAL DATA PROCESSED

Identity Information	Name-Last Name, Place of Birth, Date of Birth, Marital Status, Photograph, T.R. Identification No., Passport No., Identification Card Serial Number, Driver's License No., Father's Name, Mother's Name, Nationality, Place Registered In
Contact Details	Mobile-Landline Phone No, Personal/Business E-mail Address, Residence Address
Physical Security Information	Closed Circuit Camera Video Recordings, Sound Recordings, Turnstile Recordings and Security Recordings Taken During the Entry into and Exit from the Workplace and the Presence in the Workplace and Vehicle License Plate (In case of presence in the workplace and using the car park of the workplace)

Financial Information	Credit Card Information
Health Information	Medical information obtained by the contracted hotel physician for the management of first aid, medical diagnosis and treatment services in case of health problems
Other	IP Address, Browser Information, Surveys, Forms and Location Information (In case of utilizing the internet service in common access areas)

2. THE METHOD AND LEGAL REASON OF COLLECTION OF PERSONAL DATA

Your personal data given above, information and documents sent by you, photocopies of your driver's license, identification card and passport, and closed circuit camera recording system may be collected verbally, in writing or electronically through outsourced employment, service or consulting companies, agencies and similar channels and processed by the person(s) or the authorized institution(s) or organization(s) of this company which are subject to confidentiality obligations, for the following legal reasons.

- a) Being clearly provided for by the laws
- b) Being mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid
- c) Processing of personal data belonging to the parties of a contract is necessary provided that it is directly related to the conclusion or fulfillment of that contract (such as carrying out any business covered by the area of activity of the Company within the framework of the laws and the complete and due performance by the Company of its contractual and legal obligations in this context)
- d) Being mandatory for the Data Controller to be able to perform its legal obligations
- e) Data concerned having made available to the public by the data subject
- f) Data processing being mandatory for the establishment, exercise or protection of any right
- g) Being mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject

Personal data except for data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures and the biometric and genetic data may be processed without seeking explicit consent of the data subject in cases prescribed by the laws. Personal data

relating to health and sexual life may only be processed without seeking explicit consent of the data subject, by any persons or authorized institutions and organizations which are subject to confidentiality obligations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and care services, planning and management of health-care services as well as their financing. Except for the legal reasons listed above, your personal data may be processed in accordance with the

- Law No. 6698 on the Protection of Personal Data,
- Turkish Code of Obligations No. 6098,
- Turkish Civil Code No. 4721

and other relevant legislations.

3. REASONS FOR PROCESSING PERSONAL DATA

Personal data collected will be able to be processed for the following purposes in compliance with the processing conditions set out in Articles 5 and 6 of the Law No. 6698:

- Providing guest accommodation services,
- Fulfilling the obligations arising from the law and contract,
- Resolving legal problems likely to arise between the parties in the future,
- Communicating with the guest for service interruptions and problems during the stay,
- Payment by the guest of the remuneration and other costs through the electronic system used,
- Protecting guests and public health, providing healthcare services, fulfilling legal and regulatory requirements,
- Ensuring occupational safety and physical safety; administrative management, monitoring and checking of workplace entrances and exits; ensuring security for access to office buildings, departments, system rooms, and guest rooms; administrative management of the internet data network and ensuring cyber security

4. TRANSFERRING PERSONAL DATA

In accordance with the fundamental principles stipulated in Law No. 6698 on the Protection of Personal Data and the conditions for the transfer of personal data set out in articles 8 and 9 and the other relevant legal provisions, your personal data processed for the purposes described may be transferred to:

- Public/private institutions and organizations authorized to obtain information and documents; professional organizations which are public institutions;

- Legal consulting companies from which the company buys services to prevent or resolve legal problems that may arise;
- Company's limited number of direct and indirect domestic and international suppliers, affiliates, and subsidiaries (You can contact our company in writing for further information);
- Healthcare organizations and insurance companies from which the company is buying healthcare services;
- Institutions or organizations from which the Company buys services in the capacity of "Data Processor" to fulfill its obligations under the relevant legislation;
- Tax consultants and other consulting companies from which the company is buying services;
- Regulatory and supervisory authorities and official authorities in compliance with legal obligations and company policies.

In the light of the provisions of Article 4(2) of the Law No. 6698 on the Protection of Personal Data, on the basis of your express consent or without seeking your express consent in cases set out in Articles 5(2) and 6(3) and within the framework of the provisions of Article 9 of the Law, your personal data may be transferred abroad only to persons and entities residing in foreign countries offering sufficient protection as declared by the Personal Data Protection Board ("the Board") or, in cases of countries not offering sufficient protection, in limited cases when the data controllers in Turkey and in the relevant foreign country undertake sufficient protection in writing and the Board's permission for the transfer is obtained.

Your personal data will be disclosed to legal authorities only upon the receipt of the request of said legal authorities and it is mandatory to disclose the data in compliance with the regulations in force. Our company does not use or sell your personal data for purposes beyond these purposes, scope and activities.

We are taking all necessary technical and administrative measures to provide a sufficient level of security in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to ensure the safe retention of personal data.

5. WHAT ARE YOUR STATUTORY RIGHTS?

Pursuant to Article 11 of Law No. 6698 on the Protection of Personal Data, of the Law, you are entitled to contact our company about your personal data at any time and;

- to be informed whether your data are being processed, to learn the purpose of any processing of your personal data and whether they are being used in compliance with that purpose, to request information if they are processed;
- to know the third parties to whom your personal data are transferred at home or abroad in accordance with the relevant legislation;

- to request the rectification of the incomplete or inaccurate data, if any,
- to request deletion or elimination of your personal data within the scope of the conditions set out in the Law;
- to request that related persons to whom the data are transferred are informed of your requests of adjustment, deletion or elimination;
- to object to the processing, exclusively by automatic means, of the personal data, which leads to an unfavorable consequence for you;
- to request compensation if you suffer any loss should your personal data be unlawfully processed.

In order to exercise your statutory rights as set out in the Law, you may contact our company by filling in the "Data Subject Application Form" available at www.lujohotel.com and send the said application by using the following methods. If any new means of application are announced by the Personal Data Protection Board, these will be notified by our company.

- After the Data Subject Application Form is duly filled, you can send the original signed document either in person or via a notary public to "Meşelik Mah.Çomça Mevkii Sokak No: 10 Milas/MUĞLA" or
- After the Data Subject Application Form is duly filled in and signed with the "secure electronic signature" as stipulated in the Electronic Signature Law no. 5070, you can send the form with the secure electronic signature by registered electronic mail to serkocotelcilik@hs03.kep.tr.

Any applications you will file within this framework will be concluded within the shortest possible time and within a maximum of 30 days. The applications are free of charge for now. However, in case the Personal Data Protection Board decides to charge a fee, a fee can be charged according to the tariff to be declared by the Board.

6. PERİOD OF RETENTION FOR PERSONAL DATA

Your personal data will be retained throughout the legal process. Despite being processed under the provisions of this Law and other related laws, personal data will be erased, destructed or anonymized by the Company, ex officio with regular intervals of maximum of six months or upon your demand, in case the reasons necessitating their processing cease to exist.

The deletion of personal data is the process of rendering personal data inaccessible and irrevocable for persons processing personal data within our Company or on the basis of the authority and instructions granted by our Company with the exclusion of persons or the unit responsible to store, protect and backup the said data technically.

The elimination of personal data is the process of rendering personal data inaccessible, irretrievable and irrevocable by anyone. Anonymization of personal data renders personal data useless to be associated with a specific or identifiable real person in any way, even if when suitable techniques in terms of recording media and the relevant field of activity such as recovery and matching the data with other data are employed.

All operations carried out to delete, eliminate and anonymize your personal data will be recorded and the records in question will be retained for a period of 3 (three) years from the date of operation and made available to the Ministry if required.

Please be informed.

Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim Şirketi

ADRES : Meşelik Mah. Çomça Mevkii Sok. No: 10 Milas/MUĞLA

MERSİS NO : 6257233253547420

TİCARET SİCİL NO : 84232

VERGİ DAİRESİ : Antalya Kurumlar

VERGİ NUMARASI : 7630594074

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