



LUJO HOTEL GUEST PRIVACY NOTICE

Personal data within Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim ("Company") are under the protection of the Company, which is the data controller. The Company takes the necessary technical and administrative measures by using its technological and infrastructural facilities to ensure that personal data is processed in accordance with the law and securely stored within the framework of the Law on the Protection of Personal Data No. 6698 ("Law").

We process your personal data in accordance with the procedures and principles stipulated in the Law and other laws. We process your personal data for specific, clear and legitimate purposes, in accordance with the law and in good faith, accurately and, where necessary, up to date. We assure you that we will keep your personal data only for the maximum period specified in the relevant legislation or necessary for the purpose for which they are processed, and possibly for the legal statute of limitations.

PROCESSING OF PERSONAL DATA

We collect the personal data we request from you through your verbal, physical or electronic transmission to us.

YOUR PERSONAL DATA, PROCESSING PURPOSE AND LEGAL REASONS

By sending us your name, surname, contact information and reservation requests via call center, online sales channels, e-mail or whatsapp; In order to communicate and receive reservation requests, we process it based on the legal reason that it is necessary for the performance of the contract to be established between us. In this process, in order to improve the service we provide to you and to present it as evidence in case of any legal dispute, we process call center voice recordings based on the legal reason that data processing is necessary for the establishment, exercise or protection of a right.

We process your name, surname and bank information on the basis of the legal reason that data processing is mandatory for the performance of the contract established between us at the stage of receiving payment.

In addition to the above-mentioned data, by completing the Registration Form at the Front Office when you come to our hotel for accommodation; We process the names, surnames and contact information and communication preferences of the other guests staying with you based on their knowledge and consent. Same way; We process your health data (e.g. allergy information) that we request for the purposes of protecting your health and preventing you from experiencing any health problems during your stay, depending on your express consent, which you will give with the Registration Form.

Within the scope of our Joy Advisor service, we process your name, surname, contact information, your requests and other personal data you share through the whatsapp group created based on your explicit consent during your stay to provide personal assistance services, and destroy them at the end of your stay.

Your name, surname and contact data are only processed for the creation of the Guest Card that you will use when entering and leaving, and your name, surname, stay history, revenue details and personal preferences are processed for the loyalty program you can join in line with your preference.

• Guest profiling

In order to get to know you better and to provide a more personalized service, we process your name, surname and your preferences during your stay on the basis of legitimate interests and legal grounds.

During your stay, you can benefit from various services at our facility. When you make a reservation to benefit from any of the services, we process your name, surname, room number and contact information based on the legal reason that data processing is mandatory for the performance of the contract between us.



- Restaurant/Cafe/Bar

We process your room number and allergy information in order to prepare your order accordingly, based on your consent with the Registration Form at the entrance.

-Water sports

In order to provide water sports services in a safe manner, we process your personal data regarding your health based on your knowledge and consent.

- KIJO Club

If you want to benefit from KIJO Club services, your personal data consisting of your name, surname, room number, hotel entry-exit dates, communication language preference and your child's name, surname, date of birth and age are required for the performance of the contract established between us, through the forms you fill out. We operate on the basis of reason. We process your child's health data (allergy and blood type information) with your consent, so that we can take the necessary precautions in terms of health. If a visual and/or audio recording of the child is to be taken for the shooting of advertisements, your consent is obtained separately.

Filling Photo/Video Service Request/Registration Form

- Photo/Video

Photos and/or videos taken by our professional photographers are processed based on the legal reason that data processing is necessary for the legitimate interest of our Company without harming your fundamental rights and freedoms. Records that are not sold are destroyed at the end of your stay.

- SPA

In order to provide the SPA service safely, we process information about your health in line with your explicit consent.

- Store/Market

In accordance with the performance of the sales contract between us, we process your name, surname, contact and bank information. In addition, if you request, we process the information you share through the tax free form.

In line with your requests, suggestions and complaints, we process your name, surname, room number, contact information, audio-visual records, invoice, bank information and information about your accommodation to ensure and protect customer satisfaction based on legitimate interests and legal grounds. This data is also processed within the scope of the smart report we have prepared in order to provide you with a better and personalized service. If you participate in the post-stay surveys and give us your feedback, your name, surname, contact information, accommodation information, room number and other information you share are processed because they are related to the contract between us.

In order to ensure security in our facility and to respond to requests from law enforcement, we process the footage taken in accordance with our legal obligations. Specific to the event, we also process the camera recordings we record within the scope of being compulsory for the establishment, use and protection of a right. In order to improve security measures, regular records are taken and incident reports are kept (Man on Duty Report, Security Report, Incident Report). Within the scope of these reports, your name, surname and camera recordings are processed in accordance with the legitimate interest of the Company and on the legal grounds that it is mandatory for the exercise of a right in order to be presented as evidence in case of a legal dispute.

Log records regarding internet access are recorded in accordance with the Law No. 5651 and the mandatory provisions of the legislation regulated in accordance with this Law; These records can only be processed when requested by authorized public institutions and organizations or to fulfill the relevant legal obligations in the audit processes to be carried out within the Company.



DOMESTIC AND ABROAD TRANSFER OF YOUR PERSONAL DATA

If you reach us via e-mail, your personal data is transferred to Microsoft's secure servers located abroad, since we use Microsoft Outlook systems as e-mail service. If you contact us via Whatsapp, your personal data is transferred abroad because the servers are abroad.

In case of need or request, in order to fulfill our legal obligations, public legal entities such as the Personal Data Protection Authority, Ministry of Finance, Ministry of Health, Ministry of Customs and Trade, Tax Offices, as well as law offices and lawyers that we consult, and within the framework of confidentiality obligation. We share your personal data.

YOUR RIGHTS UNDER THE LAW ON THE PROTECTION OF PERSONAL DATA

Regarding your personal data in accordance with Article 11 of the Law;

- To learn whether the Company processes personal data about you, and if so, to request information about it,
 - To learn the purpose of processing your personal data and whether they are used in accordance with the purpose,
 - To learn whether personal data is transferred domestically or abroad and to whom,
 - Requesting correction of personal data if it is incomplete or incorrectly processed,
- you have the rights.

You can request the deletion, destruction or anonymization of your personal data within the framework of the conditions stipulated in the Law. By receiving your request, we will choose the most appropriate disposal management according to the concrete situation, you can always request information from us on this subject. If you suffer damage due to the unlawful processing of your personal data, you can request the removal of the damage.

If you wish to submit your application regarding the processing of your personal data, you can print and fill out the application form on the Company website, by post or by using the registered e-mail (KEP) address, secure electronic signature, mobile signature or the e-mail address you have previously informed us and registered in our system. You can do this by sending it to our e-mail address below.

We would like to remind you that additional verifications may be requested by the Company in order to determine whether the application belongs to you and thus to protect your rights. For example, if you apply through your e-mail address registered with the Company, we may contact you using another communication method registered with the Company and request confirmation of whether the application belongs to you.

CONTACT INFORMATION

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