# **Privacy and Personal Data Protection Policy**

During your visit to this website and your use of the services we offer through this site, the use and protection of information we may obtain about you and the services you request are subject to the terms set forth in this "Privacy Policy". By visiting this website and requesting to benefit from the services we offer through this site, you agree to the terms of this "Privacy Policy".

#### Purpose of personal data protection and processing policy

As Kuş Otelcilik Yatçılık Turizm San. ve Tic. A.Ş.- MİA CASA OTEL (hereinafter referred to as the "Hotel"), we attach great importance to the protection of your personal data. In this context, we process your personal data as the "Data Controller" in accordance with the purposes and limits set forth below under the Law No. 6698 on the Protection of Personal Data ("KVKK"), and take extreme care to take the necessary administrative and technical measures in compliance with it. Therefore, we would like to inform you about our personal data processing processes and your rights under the KVKK through this "Disclosure of Information Regarding the Processing of Personal Data".

#### Scope and amendment of personal data protection and processing policy

This Policy prepared by our Company has been prepared in accordance with the Law No. 6698 on the Protection of Personal Data ("KVKK"). The Law has come into force with all its provisions as of today. The data obtained with your consent or other legal compliance requirements stated in the Law will be used to improve the quality of the services we offer, to improve the services and quality policy offered to you. HOTEL Personal Data Protection and Processing Policy aims to protect the automatically obtained data of our customers, customer candidates, our employees, the customers and employees of companies working in partnership with us, or other individuals, and includes regulations regarding them. Our Company has the right to change our policy and regulation in compliance with the Law and the better protection of personal data.

#### IBasic principles regarding the processing of personal data

a) Compliance with the law and honesty rules: HOTEL inquires about the source of the data it collects or receives from other companies and attaches importance to obtaining them in accordance with the law and honesty rules. Within this framework, HOTEL warns and notifies third parties (including agents and other intermediary organizations) who sell the services it offers about personal data protection.
b) Being accurate and up-to-date when necessary: HOTEL attaches importance to ensuring that all data within the organization is accurate and does not contain incorrect information, and updates them when changes occur in personal data, provided that they are notified to us.

c) Processing for specific, clear and legitimate purposes: HOTEL processes personal data only with the explicit consent of the individuals during the services we offer...d) Processing for specific, explicit, and legitimate purposes: HOTEL processes data only for the purposes it has obtained consent from individuals during the service and limits its use to those purposes. The data is not processed, used, or made available for any other purposes outside the scope of the intended use.

e) Data minimization, relevance, and proportionality: HOTEL only uses data to the extent necessary for the purposes for which it was collected and required by the service.

f) Storage limitation: HOTEL retains contract-related data in accordance with the timeframes required by the law, commercial and tax laws. However, when these purposes have been fulfilled, the data is either deleted or anonymized

It is important to note that these principles apply even if HOTEL has obtained the data either with your consent or in accordance with the law.

## Principle of Minimal Data Collection:

In accordance with our principle of minimal data collection, HOTEL only processes data that is necessary for the operation of the system. Unnecessary data is not collected. Other data received by the company is transferred to the company's IT systems in the same way. Redundant information is not stored in the system, and is either deleted or anonymized. These data may be used for statistical purposes. Health data, which is considered sensitive information, is only collected to provide better service to customers and to protect their health, and is carefully stored in the system.

#### **Deletion of Personal Data:**

When the legally required storage periods have expired, legal processes have been completed, or other requirements have been met, HOTEL will automatically delete, destroy, or anonymize personal data upon request.

#### Accuracy and Data Currency:

As a rule, data processed within HOTEL is processed as declared by the relevant individuals. HOTEL is not required to investigate the accuracy of the data declared by customers or individuals who contact HOTEL, nor does it do so due to our legal and working principles. The declared data is assumed to be accurate. HOTEL also adopts the principle of accuracy and data currency. The company updates personal data processed on official documents received by the company or upon request of the relevant individuals and takes the necessary precautions.

#### **Privacy and Data Security**

Personal data is confidential, and HOTEL respects this confidentiality. Only authorized personnel within the company can access personal data. Necessary technical and administrative measures are taken to protect the personal data collected by HOTEL, prevent unauthorized access by third parties, and ensure that our customers and potential customers are not harmed. In this context, software is compliant with standards, third parties are carefully selected, and the data protection policy is complied with within the company.

## **Purposes of Data Processing**

The collection and processing of personal data by HOTEL will be carried out in accordance with the purposes specified in the information notice. Data is collected and processed for the purpose of establishing a contract and providing better service to customers.

## **Customer, Potential Customer, and Business Partner Data**

If a contractual relationship has been established with our customers and potential customers, the collected personal data can be used without obtaining the customer's consent. However, this use is carried out in accordance with the purpose of the contract. Data is used for better performance of the contract and as necessary for the service, and it is updated by contacting the customers if necessary. On the other hand, the data provided by our potential customers is processed to provide them with easier and higher quality service if it does not turn into a contractual relationship. If requested, this data is deleted.

# **Data Sharing with Business and Solution Partners**

HOTEL adheres to the principle of acting in accordance with the law when sharing data with both business and solution partners. Data is shared only as much as required for the service with a commitment to data privacy and these parties are required to take measures to ensure data security.

# **Data Processing for Advertising Purposes**

In accordance with the Law on Regulation of E-Commerce and the Regulation on Commercial Communication and Commercial Electronic Messages, electronic messages for advertising purposes can only be sent to individuals who have previously given their consent. The consent of the person to whom the advertisement will be sent must be clearly available. HOTEL complies with the details of the "consent" specified by the same legislation. The consent to be obtained should cover all commercial electronic messages sent to the recipient's electronic communication addresses to promote and market your company's goods and services, introduce your business, or increase awareness with content such as congratulations and wishes. This consent can be obtained in writing in physical form or through any electronic communication medium. What is important is the positive declaration of intent of the recipient to accept the sending of commercial electronic messages, along with their name and surname and their electronic communication address.

# **Data Processing for Legal Obligations**

Personal data may be processed without obtaining separate consent for processing, where the processing is explicitly specified in the relevant legislation or for the

fulfillment of a legal obligation determined by the legislation. The type and scope of data processing activities must be necessary for legally permitted data processing activities and must comply with the relevant legal provisions.

## **Company's Data Processing**

Personal data may be processed in line with the services and legitimate purposes offered by the company. However, the data cannot be used for any unlawful services. Processing of Special Categories of Personal Data According to the Law on the Processing of Personal Data, the data related to individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and appearance, membership of association, foundation or union, health, sex life, criminal record and security measures, as well as biometric and genetic data, are special categories of personal data. HOTEL also takes sufficient measures determined by the Board in the processing of special categories of personal data. With the individuals' consent, HOTEL can process special categories of personal data collected only for the purpose for which they were collected to provide better services.

# Data Processed by Automatic Systems

HOTEL acts in accordance with the Law regarding data processed through automatic systems. Information obtained from these data cannot be used against individuals without their explicit consent. However, HOTEL can make decisions regarding individuals with whom it will transact by using data from its own systems.

# User Information and the Internet

If personal data is collected, processed, and used on websites and other systems or applications belonging to HOTEL, relevant individuals will be informed about privacy notices and, if necessary, about cookies. Individuals will be informed about our applications on web pages. Personal data will be processed in accordance with the law.

When you visit our website, we provide you with the following information regarding cookies we use/will use on our page.

	Purpose of Using Cookies	Cookie Type
Cookie Type Google (analytics, doubleclick)	Measurement Advertising Site optimization	Functional and analytical cookies

Cookie Type Facebook	Measurement
(pixel, )	Advertising Site
	optimization

Functional and analytical cookies Commercial cookies

## **Functional and Analytical**

If personal data is collected, processed, and used on websites and other systems or applications owned by HOTEL, the relevant individuals will be informed through a privacy notice and, if necessary, about cookies. Individuals will be informed about our applications on web pages. Personal data will be processed in accordance with the law.

When you visit our website, we provide you with the following information regarding the cookies we use/will use on our website.

## **Third-Party Cookies**

HOTEL websites work with third-party reliable and well-known advertising providers. Third-party service providers place their own cookies to offer you personalized ads. Cookies placed by third parties collect, process and analyze visitors' navigation information on websites.

#### **Commercial Cookies**

It serves to increase your user experience by presenting you with similar high-quality products/content according to your interests and choices and offering a more advanced, personalized advertising portfolio. The background retention period of the above-mentioned session, persistent, functional and analytical, and commercial cookies is approximately 2 (two) months, and the necessary adjustments can be made from the individual's internet browser settings. The removal process from these settings may vary depending on the internet browser.

# How Can I Delete Cookies?

Many web browsers are set to automatically accept and use cookies from the first installation on your computer. Using the help or settings menus of your web browser, you can block cookies or enable notifications when a cookie is sent to your device. You can learn different ways to manage cookies and get detailed information on how to adjust your browser's settings from the instruction or help options of your browser.

# Transfer of Personal Data within Turkey and Abroad

Personal data may be shared with HOTELs service and solution partners, as well as HOTEL affiliates, to enable the provision of services by HOTEL.

HOTEL may transfer personal data to the following persons and institutions for certain purposes;

To HOTEL's business partners on a limited basis for the purpose of ensuring that the objectives of the business partnership are achieved,

To HOTEL's suppliers on a limited basis to ensure that the services necessary for

HOTEL's commercial activities are provided,

To HOTEL's solution partners on a limited basis to ensure that commercial activities requiring the participation of HOTEL's affiliates are carried out, To HOTEL's affiliates.

HOTEL is authorized to transfer personal data within Turkey and abroad, in compliance with other conditions specified in the Law and subject to the person's consent, within the terms determined by the Board in the Law.

# Rights of the data subject

HOTEL acknowledges that the data subject has the right to give consent before their personal data is processed, and the right to determine the fate of their data after it has been processed, in accordance with the Law.

Individuals whose personal data is processed by HOTEL have the right to: a)Know whether their personal data is being processed.

b)Request information if their personal data has been processed,

c)Know the purpose of the processing and whether it is being used for its intended purpose,

d)Be informed about third parties to whom their personal data has been transferred, both domestically and abroad,

e)Request the correction of their personal data if it is incomplete or incorrect,

f)Request the deletion or destruction of their personal data within the framework of the conditions set forth in the Law,

g)Request that the actions taken in accordance with this Privacy and Personal Data Protection Policy be notified to third parties to whom their personal data has been transferred,

h)Object to the occurrence of a result against themselves as a result of their personal data being analyzed exclusively through automatic systems,

i)Request compensation for damages in case of suffering damages due to the unlawful processing of their personal data

However, there is no right for individuals regarding anonymized data within the Company. HOTEL may share personal data with relevant institutions and organizations for the purpose of exercising a judicial duty or the lawful powers of a government authority, in accordance with business and contractual relationships. Personal data owners can submit their requests regarding the above-mentioned rights by filling out the application form, which can be accessed from the Company's official website at https://lssiyahHOTEL.com or via the link below, using one of the submission methods indicated in the form, and sending it to the Company with a copy of their identity document (only the front face copy for the identity card).

#### **Application Form**

Depending on the content of your application, your requests will be responded to as soon as possible or within a maximum of 30 days after reaching our company. Your applications must be made by registered mail. Additionally, only the part of your

application related to yourself will be responded to, and any application made regarding your spouse, relative or friend will not be accepted. HOTEL may also request additional information and documents from the applicants.

## **Privacy Policy**

The data of both employees and other individuals at HOTEL are confidential. No one can use, copy, reproduce, transfer or use these data for any other purpose without compliance with the contract or law.

## **Transaction Security**

Necessary technical and administrative measures are taken to protect the personal data collected by HOTEL from unauthorized access and to prevent our customers and prospective customers from being harmed. In this context, software is made compliant with standards, third parties are carefully selected, and data protection policy is complied with within the company. Security measures are constantly being renewed and improved.

## **Contact Information**

Contact For your questions and requests regarding the privacy agreement, it is necessary to apply with a registered letter to the address below.

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