

Clearance Text for the Law on Protection of Personal Data

1. ID of the Data Officer

As Sezer İnşaat Otelcilik Turizm Ticaret Ve Sanayi Anonim Şirketi ("LONICERA HOTELS"), we attach importance to the security and privacy of your personal data, including our guests who benefit from our services, we hereby inform you of all information related to LONICERA HOTELS related to all personal data under the Law No. 6698 on the Protection of Personal Data ("Law") in order to fulfill our obligation to clarify the following issues.

Protection of personal data is among the basic policies of LONICERA HOTELS and this company gives priority to the confidentiality of personal data during the existence of our business, adopts this as a working principle and instructs its employees to work in line with this principle. LONICERA HOTELS accepts and undertakes to comply with all responsibilities of the KVK Law. We are fully aware of this responsibility and as Data Officer, we process, record, transfer, share and store your personal data within the limits prescribed by official legislation.

2. Collection, Processing and Processing Tools of Personal Data

YOUR PERSONAL DATA TO BE PROCESSED

Your personal data that may be processed by us are as follows:

The categories include the Identity, Communication, Personality, Legal Process, Physical Space Security, Customer Transaction, Transaction Security, Finance, Professional Experience, Marketing, Audio and Visual Records, Race and Ethnic Origin, Philosophical Belief, Religion, Denomination and Other Beliefs, Health Information, Criminal Convictions and security measures. You can access detailed and up-to-date information from the Personal Data Protection Authority Registry Inquiry System, you can examine Categories, Objectives, Recipients, Times, Person Groups, Foreign Countries, Security Measures.

Identity Data, Personal Data	Name Surname, National Identity Number, Identity Serial Number, Photo, Mother Name, Father Name, Place of Birth, Date of Birth, Registration Place, Volume No, Family Line Number, Record No, Marital Status, Gender, Passport Number, Nationality
Accommodation Data	Staying room, room type, expenditures, check-in and check-out dates,
Communication Data	Phone, email address, address
Financial Data	Expenditure information at the hotel (products and services received, etc.), credit card number and other information), bank account information
Special Qualified Personal Data	In case of photocopy of identity document for verification, religious information and blood type, health data, biometric data in order to control the entry and exit of personnel
Visual Data	Camera recordings
Family and Relative Data	Name, surname, age, relation, room number of the spouse and children and other persons or the name and surname of the relative and family members declared by the employees, date of birth, identification number of the Republic of Turkey
Other information	Military service, criminal record, education information, reference information, signature, license plate etc.

Your personal data may vary with respect to the products and services or commercial activities offered by LONICERA HOTELS, but may be processed by our Company under the best protection.

The identity, communication, religion / belief, health, financial, education and other sensitive personal data shall be available for candidate employee, employee, former employee, customer, guest, person receiving product or service, potential product or service buyer, supplier, supplier employee, and visitor.

Your personal data obtained by the LONICERA HOTELS as a result of compliance with the laws of the Republic of Turkey or obtained with the consent of the data owners shall be processed by LONICERA HOTELS for the purposes stated below:

- Making customer records and carrying out proceedings within this scope
- Fulfilling our legal obligations specified in the Constitution / Law / Decree Law / Statute / Regulations
- Conducting product supply and after-sales service processes, carrying out repair operations, ensuring customer satisfaction and meeting demands
- Our business units carry out the necessary works to benefit you from the products and services offered by our business
- Ensuring the legal and commercial security of the persons in business relationship with our business (administrative operations for communication carried out by our business, ensuring the physical security and supervision of the locations of our business, evaluation of business partner / customer / supplier (authorized or employees), legal compliance process, financial works etc.),
- Managing security operations, accidents or other similar medical-insurance incidents
- To ensure the security of the people in our facilities by using video camera (CCTV) images and to help prevent, detect and prosecute criminal offenses; create, enforce or defend our legal rights by taking into account photographs as well
- Informing you about the information, activities and services you will request from our business,
- Determining and implementing commercial and business strategies of our business
- Ensuring the execution of human resources policies of our business
- Fulfillment of a legal obligation determined by the legislation if it is explicitly stated in the legislation or if necessary
- Making analysis and loyalty studies about the products and services you purchase, promotion, survey, advertising, market research, marketing and campaigns planning and implementation, general and special offers.

In addition to this, we also process your personal data to ensure that our purpose and legal obligations are met within the framework of the Law on the Identification of Information No. 1774, the Law on the Regulation of Publications Made on the Internet and Combating Crimes Committed through These Publications No. 5651 and concerned legislation, the Law on the Regulation of Electronic Commerce No. 6563 and the related legislation, the Labor Law No. 4857, the Turkish Commercial Code No. 6102, the Turkish Penal Code No. 5237 and the Law on the Protection of Personal Data No. 6698.

In addition, your personal data mentioned above shall be stored in the physical archives and information systems of LONICERA HOTELS and kept in both digital and physical environments.

Your personal data processed for the purposes set forth in this document will continue to be anonymized or deleted by us when the purpose requiring processing according to Law No. 6698 is removed and the deadlines set by the law have expired. You have the right to revoke your express consent to the processing and use of your personal data at any time.

3. Transferring Personal Data

Provided that your personal data is limited to the reason that it requires to be transferred for the purposes described above under the Law and the related regulations, in order to provide you with this service, our company shall transfer your personal data to service providers such as information technology, software, archives, printing, card printing, distribution company and other third parties with whom we cooperate

and shall transfer them for storage and archiving activities at abroad; if you are an agency customer, it can be transferred to the agency you purchase abroad, our board of directors, our business solution partners and legally authorized public and private institutions and organizations.

4. Method and Legal Reason for Collecting Personal Data

For the purposes set out above, in accordance with the basic principles provided for in the Law and provided for in the laws specified in paragraph 2 of Article 5 of the Law, the establishment and / or performance of the contract, the fulfillment of the legal obligation, provided that the basic rights and freedoms of the concerned person shall not be harmed, your personal data shall be collected from all kinds of verbal, written or electronic media by automatic or non-automatic methods based on legal reasons of legitimate interest of our Company.

5. Your Rights to Protect Personal Data

You have rights to learn whether your personal data is processed in accordance with the Law and to request information if it is processed; to learn the purpose of processing and whether or not it is used by us in accordance with these purposes, to learn third parties in Turkey or abroad whom data is transferred; request correction if it was processed in incomplete or wrong; request deletion or annihilation or anonymization in the event of the disappearance of the reasons for its processing; in such cases or in case of correction, request the name of the third parties to whom the data is transmitted; and you have the right to object to this situation if you believe that a result has been brought against you by analyzing the processed data exclusively through automated systems.

Within the scope of the Law, for your personal data applications, you can fill in the relevant fields in the application form of LONICERA HOTELS Personal Data Owner, and request information in one of the following ways:

APPLICATION METHOD	Application in written	Through email
APPLICATION ADDRESS	Türkler Mh. Sipahioğlu Sk. No:4 Alanya/ANTALYA	kvkk@lonicera.com.tr
ADDITIONAL INFORMATION TO BE SENT AT THE APPLICATION	"Request for Information under the Law on Protection of Personal Data" shall be written on the envelope / notification, if this statement is not made, the request will not be processed. Official documents identifying you may be requested.	"Request for Information within the Scope of the Law on Protection of Personal Data" will be written in the subject part of the E-Mail, if this statement is not made, the request will not be processed. Official documents identifying you may be requested. Requesting via our e-mail address that you have already given for registration shall accelerate the identification process.

In accordance with Article 13 of the Law, our Company shall finalize the application requests according to the nature of the request and within 30 (thirty) days at the latest. If the proceeding requires cost, the tariff set by the Personal Data Protection Board shall be applied. If the request is rejected, the reason (s) of rejection or the proceeding carried out in case of the realization of the request, it shall be justified in writing or electronically.

LONICERA HOTELS reserves the right to update this Clearance Text on the Protection of Personal Data within the framework of any amendments to the applicable legislation or data protection processes.