

**OUR PERSONAL DATA PROTECTION POLICY AND PROCESSING OF PERSONAL DATA
CLARIFICATION TEXT
(Şeynan Turizm Otelcilik Anonim Şirketi)**

1. DATA RESPONSIBLE AND REPRESENTATIVE

Şeynan Turizm Otelcilik Anonim Şirketi (Hereinafter referred to as “Nearport Hotel” or “Company”), in the capacity of Data Responsible and in accordance with Law No. 6698 on Protection of Personal Data ("Law No. 6698"); will be able to process your personal data as explained below.

2. THE PURPOSE OF OUR PERSONAL DATA PROCESSING POLICY

Nearport Hotel (Şeynan Turizm Otelcilik Anonim Şirketi), exercise maximum sensitivity and due diligence in terms of the security of your personal data as Data Responsible. With this awareness, the processing, recording, transfer, and sharing of any personal data belonging to all persons associated with the Company, including those benefiting from the products and services offered by Nearport Hotel, are among the most important priorities of our Company.

Protection of personal data has been among the major and fundamental policies of Nearport Hotel. From this point of view, the Company has given utmost and primary importance to the confidentiality of personal data during its existence, has adopted this as a working principle and has ordered all its employees to work in line with this principle. Nearport Hotel accepts and undertakes to comply with all regulations and responsibilities imposed by the Law.

We operate, record, transfer, share and store your personal data, with the awareness of the letter and purpose of Law No. 6698 and the responsibility we assume as Data Responsible, only to the extent required by our service, within the limits set by legislation.

3. YOUR PERSONAL DATA TO BE PROCESSED

Your collected personal data categories and descriptions to be processed by our business units in order to benefit you from the products and services offered by our Company within the scope of the purposes and legal reasons specified in this text in accordance with the relevant legislation are as follows:

Credentials: Name-Surname, Birth Date and Place, Nationality, Identity number, Name and Surname of the accompanist

Contact Information: Address, Phone Number/Mobile, E-mail Address

Financial Information: Bank Account Information, Credit/Debit Card Information

Special Categories of Personal Data: Photo, Health status and drug usage information, Smoking information, Allergic Sensitization Information; only depending on the condition of explicit consent and in accordance with the principle of proportionality.

Other: Room Number, Vehicle Registration Plate Number

4. METHOD AND LEGAL REASON OF COLLECTING PERSONAL DATA

Your personal data is obtained orally, in writing/black and white or electronically, by automated or non-automated methods, based on the legal reasons laid down in Articles 5, 6, 7 and 8 of Law No. 6698/KVKK, in order to achieve the purposes specified in Articles 3 and 4 of this clarification text:

- Filling out a form, sending an e-mail message, to contact by phone, visiting the website and contacting via social media platforms.

- Communication through online sales platforms, tourism agencies, organization companies, business card sharing during fair or seminar visits, solution partner institutions or organizations.

5. THE PURPOSE OF PERSONAL DATA TO BE PROCESSED

Your collected personal data shall be processed by Nearport Hotel's business units in accordance with the personal data processing requirements and purposes stated in Articles 5 and 6 of Law No. 6698 for the following purposes but not limited to these:

- Fulfilling the legal obligations of the Company
- Negotiating and executing contracts,
- Planning and executing the Company's human resources policies and processes
- Carrying out the necessary work to benefit the people involved in the products and services offered by the company by our business units and carrying out the relevant business processes.
- Planning and execution of the activities required for the recommendation and promotion of the products and services offered by the company according to the likes, usage habits and needs of the relevant people.
- Conducting Audit and Ethics activities
- Ensuring the security of the website and other electronic systems of the Company or used by the Company and Physical Space Security,
- Conducting legally required storage and archive activities,
- Informing the authorized institutions and organizations
- Carrying out necessary works in order to perform the commercial activities carried out by the company, by our relevant business units and executing related business processes
- Planning and execution of the commercial and / or business strategies of the Company,
- Ensuring the legal, technical and commercial-business security of the Company and the related persons who are in a business relationship with the Company,
- Responding to requests and questions and to release informations concerning the data subject,
- To help prevent, detect and prosecute criminal offenses, establishing a positive basis for our legal rights and to protect, defend or execute our legal rights

6. PARTIES TO WHICH YOUR PERSONAL DATA CAN BE TRANSFERRED AND THE PURPOSE OF THE TRANSFER

Your collected personal data, in accordance with the basic principles stipulated by the Law and the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law, can be transferred to the public authorities, legally authorized private institutions, our business partners and counsels subject to the rules determined within the Law, for the purposes listed below by Nearport Hotel. Your personal data is not transferred abroad.

- Planning and execution of the Company's human resources policies and processes
- Carrying out the necessary studies to benefit the products and services offered by the Company by our business units and conducting the related business processes,
- Planning and execution of the Company's commercial and / or business strategies,
- Assuring the legal, technical and commercial-occupational safety of the Company and persons who are in business relations with the Company
- To help prevent, detect and prosecute criminal offenses, establishing a positive basis for our legal rights and to protect, defend or execute our legal rights

Our Company does not share the personal data it has obtained with others for the promotion and marketing activities of third parties in any way without the express and private consent of the data subject.

5. METHOD AND LEGAL REASON OF COLLECTING PERSONAL DATA

Your personal data may also be collected visually, verbally, vocally, electronically, in writing/ black and white, or by means of another physical manner by Nearport Hotel to the purposes set forth in A 3 and 4 of this Clarification Document within the scope of the personal data processing requirements and purposes set forth in Articles 5,6,7 and 8 of Law No. 6698. It may show an alteration as the relationship between the Data Subject and the Nearport Hotel is specific to the legal situation, yet the methods of collecting personal data are generally as follows;

- Through verbal, written and electronic notices or contacts with our Company; physically in our Hotel or via website and likewise electronic environments and other physical environments to our Company
- Through third parties such as agents, tour operators, job search platforms where our Company receives services or engages in business partnerships.

6. RIGHTS OF THE PERSONAL DATA SUBJECT

As a Personal Data Subject you have the following rights pursuant to Article 11 of Law No. 6698:

- Learning whether your personal data is processed,
- If your personal data is processed, requesting information about it,
- Learning the purpose of processing your personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom your personal data is transferred domestically or abroad,
- In case your personal data is incomplete or incorrectly processed, to request their correction and to request notification of the transaction made within this scope to the third parties to whom your personal data is transferred,
- Despite being processed in accordance with the Law and other relevant provisions of the law, to request the deletion or destruction of personal data in case the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom your personal data is transferred,
- To object in that case there is a result against you by analyzing the processed data exclusively through automated systems,
- Requesting the removal of the damage if you suffer damage due to illegal processing of your personal data.

7. STORAGE OF YOUR PERSONAL DATA

Your personal data can be stored for periods of time required by processing purposes. In the absence of any other reason or legal reason, the absence of international law or regulation, and if the obligations arising from the agreements disappear, your personal data, whose processing purposes have disappeared, is deleted, destroyed or anonymized.

8. THE CASE THAT YOUR PERSONAL DATA CAN BE PROCESSED WITHOUT YOUR EXPRESS CONSENT IN ACCORDANCE WITH THE LEGISLATION:

Nearport Hotel, can process your personal data obtained and collected legally without your express consent pursuant to Article 5 of Law No. 6698, in the following cases:

Cases it is expressly provided by Legislation ;

- If there is a legal obligation to process your personal data in the event that you are unable to disclose your consent as a data subject due to actual impossibility, or your consent is not legally valid, to protect yourself or someone else's life or body integrity,
- If it is necessary to process the personal data of the parties of the contract, provided that the Company is directly related to the establishment or performance of a contract that you have concluded with other real and / or legal persons,
- If it is mandatory for the Company to fulfill a legal obligation,
- If your personal data has been publicized by you,
- If data processing is mandatory for the establishment, use or protection of a right,
- If data processing is mandatory for the Company's legitimate interests, provided that it does not harm your fundamental rights and freedoms.

9. DURATIONS THAT YOUR PERSONAL DATA CAN BE PROCESSED

Pursuant to Law No. 6698, your personal data processed in accordance with the purposes indicated herein this "OUR PERSONAL DATA PROTECTION POLICY AND PROCESSING OF PERSONAL DATA CLARIFICATION TEXT, will be deleted, destroyed, or anonymized by us when the purpose that requires processing has disappeared and / or when the timeout period has become mandatory for us to process your data in accordance with the legislation as per the prescribed procedures and principles in Article 7/f.1 of Law No 6698 and "Regulations for the erasure, destruction or anonymization of personal data effectuated on the date of 01.01.2018".

10. ÖZEL NİTELİKLİ VERİLERİN İŞLENMESİ

A number of personal data that are at risk of causing victimization or discrimination in the case they are processed illegally are defined as "special categories of personal data" on the Article 6 of Law No 6698. These data are; race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, appearance and raiment, association / foundation or union membership, health, sexual life, criminal conviction data, data on security measures, biometric data and genetic data. The Company acts in accordance with the regulations stipulated in article 6 of the Law No. 6698 with regards to processing of special categories of personal data and shows sensitivity in the protection of these data.

Special categories of personal data is processed by the Company in accordance with the Law No. 6698, provided that adequate measures to be determined by the Personal Data Protection Board in the following cases:

a. In that case the Personal Data Subject has express consent;

Our guests can request customized services by sharing their conditions with the Company and share their special categories of personal data for this purpose (in the case that the guests demand special service; for example, requesting a thin pillow due to neck hernia, requesting a room on the ground floor due to heart disease or requesting a change in the content of the food prepared due to allergies, etc). Our Company will process the private data of the individuals only by obtaining explicit consent from the relevant person and only to serve the purpose of the collection, so that we can provide customized services for the needs of our guests by sharing their special categories of personal data and remember them, in the future, to provide them with the same services.

b. In that case the Personal Data Subject does not have express consent;

- Special categories of personal data, other than the health and sexual life of the personal data subject, can be processed in that case it is required by law,
- Special categories of personal data can be processed only by individuals or authorized institutions and organizations that are under the obligation of confidentiality only for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, only if the mentioned special categories of personal data is related to the health and sexual life of

the personal data subject.

11. FOR YOUR REQUESTS:

If you would like to contact us, give us feedback, under the Law No. 6698, or use your rights under the law or direct your questions, you can send us your request by filling out the application form on the link The necessary referrals are included in the application form and if you have a question about using the application form, you can contact us at kisiselveriler@nearporthotel.com