YAZICI TURİZM YATIRIMLARI VE İŞLETMELERİ A.Ş.

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy has been prepared by **YAZICI TURİZM YATIRIMLARI VE İŞLETMELERİ A.Ş.** (the "Company" or "**GRAND YAZICI MARMARİS PALACE"),** with its registered office at **İçmeler Mahallesi, Atatürk Caddesi No: 62**, in its capacity as the "Data Controller" under the Turkish Personal Data Protection Law No. 6698 ("KVKK"), for the purpose of informing you about the purposes for which your personal data are processed, the parties to whom and purposes for which your personal data may be transferred, the methods and legal grounds for collecting your personal data, and your rights under Article 11 of the KVKK.

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3. Scope and Purpose of the Policy

This Personal Data Protection Policy sets out, in detail, the following matters regarding the processing of personal data by Grand Yazıcı Marmaris Palace:

a. The methods and legal grounds for collecting personal data;

b. The categories of data subjects whose personal data are processed;

c. The categories of personal data processed in relation to data subjects and examples of the relevant data types;

d. The purposes for which the relevant personal data are used;

e. The parties to whom personal data may be transferred and the purposes of such transfers;

f. The sharing of personal data with public institutions, organisations and official authorities;

g. The rights of data subjects in relation to their personal data and the procedures for exercising these rights.

4. Methods and Legal Grounds for Collecting Personal Data

Grand Yazıcı Marmaris Palace collects personal data directly from the data subject, through CCTV systems, contracted travel agencies, cookies, email and other communication channels, in audio, electronic or written form, in accordance with the personal data processing conditions set out in the KVKK and on the legal grounds specified in this Personal Data Protection Policy.

These legal grounds include, in relation to contracts entered into with guests (customers), subcontractors, suppliers, travel agencies (business partners) and tenants: the establishment and performance of a contract; compliance with the Company's legal obligations arising from applicable legislation; the establishment, exercise or protection of a right; and, in exceptional circumstances, the Company's legitimate interests.

5. Categories of Data Subjects

Grand Yazıcı Marmaris Palace classifies the data subjects whose personal data it processes as follows:

i. Customers (Guests);

ii. Visitors;

iii. Online Visitors;

iv. Employees and/or Representatives of Business Partners, Suppliers and Tenants.

6. Categories of Personal Data and Examples of Data Types

No.	Data Subject	Category of Personal Data	Examples of Data Types
1	Customer/Guest	Identity Information	First and last name, gender, Turkish identity document details (including wallet serial number and family sequence number), passport number, vehicle registration details

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No.	Data Subject	Category of Personal Data	Examples of Data Types
		Contact Information	Home/work address, email address, telephone/mobile phone number
		Financial Information	Payment details, invoicing details, credit card number, bank account details
		Customer Information	Travel and tour records (including check-in and check-out dates), activity participation information
		Special Categories of Personal Data	Health data (including allergy and disability information), nationality information
		Family Members and Close Contacts Information	Number of children, children's first and last names, telephone numbers of family members and close contacts, passport numbers
		Physical Premises Security Information	CCTV footage
2	Visitor	Identity Information	First and last name
		Corporate Identity Information	Company name, title/position
		Contact Information	Email address, telephone/mobile phone number
		Legal Proceedings and Compliance Information	Signature
		Physical Premises Security Information	Vehicle registration plate, CCTV footage

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No.	Data Subject	Category of Personal Data	Examples of Data Types
3	Online Visitor	Identity Information	First and last name
		Transaction Security Information	Username, logs maintained under Law No. 5651, traffic data
4	Employee and/or Representative of a Business Partner, Supplier or Tenant	Identity Information	First and last name
		Contact Information	Address, email address, telephone/mobile phone number
		Financial Information	Invoicing details
		Legal Proceedings and Compliance Information	Signature circulars, powers of attorney, signature
		Physical Premises Security Information	CCTV footage

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7. Purposes of Processing Personal Data

Personal data are processed for the following purposes:

- Conducting the necessary activities by the relevant business units to carry out the Company's commercial activities and managing the related business processes;
- Planning and executing supply chain management processes;
- Planning, auditing and executing information security processes;
- Establishing and managing information technology infrastructure;
- Managing the Company's finance and accounting activities;
- Planning and executing the Company's operational processes;
- Planning and conducting internal and external training activities;

- Managing relationships with business partners and/or suppliers;
- Managing contractual processes and/or legal claims;
- Planning and executing the sales processes for products and/or services;
- Planning and managing customer relationship management processes;
- Tracking customer requests and/or complaints;
- Planning and conducting customer satisfaction activities;
- Following up on legal matters and fulfilling legal responsibilities;
- Fulfilling obligations arising from applicable legislation;
- Providing information to authorised institutions and organisations as required by law;
- Planning and carrying out the operational activities necessary to ensure that the Company's activities comply with internal procedures and/or applicable legislation;
- Planning and conducting the Company's audit activities;
- Ensuring the security of the Company's premises and/or facilities;
- Ensuring the security of the Company's operations;
- Managing the procurement of items required for the Company's premises and the Company's movable assets;
- Creating and maintaining visitor records;
- Managing compensation and insurance processes relating to damage sustained by guests' vehicles.

8. Parties to Whom Personal Data May Be Transferred and the Purposes of Such Transfers

Grand Yazıcı Marmaris Palace transfers personal data to third parties only for the purposes specified in this Personal Data Protection Policy and in accordance with Articles 8 and 9 of the KVKK.

Depending on the nature and scope of the services obtained from third parties, pseudonymised data are used for transfers wherever the transfer of identifiable personal data is not necessary.

In addition to the technical measures taken to ensure the security of the personal data transferred as described above, such data are also protected by legal measures through provisions compliant with the KVKK included in our contracts, taking into account whether the other party to the relevant legal relationship acts as a data controller or a data processor.

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No.	Data Subject	Parties with Whom Personal Data Are Shared and Purposes of Sharing
1	Customer/Guest	Personal data may be shared with contracted travel agencies to manage customer complaints; with contracted law firms to follow up on legal proceedings; with the travel agency arranging transportation for guests who request transfers to the hotel; and with insurance companies, travel agencies and, where necessary, lawyers and courts to manage compensation and insurance processes relating to damage sustained by guests' vehicles.
2	Visitor/Online Visitor	Log records may be shared with the internet service provider supplying the relevant infrastructure. Relevant data may also be shared with auditing firms within the scope of audits conducted by the Company.
3	Employee and/or Representative of a Business Partner, Supplier or Tenant	In the event of a workplace accident, relevant personal data may be shared with healthcare institutions to ensure the necessary medical treatment. Personal data may also be shared with lawyers for the purpose of pursuing legal proceedings.

9. Sharing of Personal Data with Public Institutions, Organisations and Official Authorities

No.	Data Subject	Parties with Whom Personal Data Are Shared and Purposes of Sharing
1	Customer/Guest	Traffic data arising from the use of internet services provided at the Company's premises may be shared with public institutions and organisations legally authorised to request such information, where required by legal obligations, including but not limited to circumstances involving the prevention of crime, threats to public or state security, or other situations in which the Company is subject to a legal or administrative obligation to report or provide information. Personal data may also be shared with official authorities for the purpose of pursuing legal proceedings.

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No.	Data Subject	Parties with Whom Personal Data Are Shared and Purposes of Sharing
2	Visitor/Online Visitor	Log records may be shared with official authorities. CCTV footage may also be shared with official authorities, including public prosecutors' offices and courts, where requested.
3	Employee and/or Representative of a Business Partner, Supplier or Tenant	Personal data may be shared with the relevant public institutions to fulfil statutory reporting obligations handled by the accounting department. In the course of tax audits, invoicing details may be shared with the Ministry of Treasury and Finance. Financial data may also be shared with banks to fulfil payment obligations arising from commercial relationships.

10. Rights of Data Subjects in Relation to Their Personal Data and How to Exercise These Rights

Pursuant to Article 11 of the KVKK, you have the following rights:

1. To learn whether your personal data are being processed;
2. To request information regarding the processing of your personal data;
3. To learn the purpose of processing your personal data and whether such data are used in accordance with that purpose;
4. To know the third parties, in Türkiye or abroad, to whom your personal data have been transferred;
5. To request the rectification of incomplete or inaccurate personal data;
6. To request the erasure or destruction of your personal data under the conditions set out in Article 7 of the KVKK;
7. To request notification of the actions taken pursuant to subparagraphs (d) and (e) to third parties to whom your personal data have been transferred;
8. To object to any result arising against you from the analysis of your personal data exclusively through automated systems;
9. To claim compensation for damages incurred as a result of the unlawful processing of your personal data.

As a data subject, you may submit your requests concerning your rights and the exercise of your rights in relation to your personal data by contacting us at

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pkisiselveri@grandyazicihotels.com or by using one of the methods specified in the application form available at:

https://www.grandyazicihotels.com/club-marmarispalace/iletisim

If you submit your request to the Company through the methods specified above, the Company will assess and conclude your request free of charge as soon as possible and, in any event, within thirty days, depending on the nature of the request.

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