

 PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
	Issue Date	20.11.2019
	Revision Date	01.10.2026
	Revision No	02
	Page No	1/8

This Personal Data Protection Policy has been prepared by YAZICI TURİZM MARMARİS İŞLETMELERİ A.Ş. ("GRAND YAZICI CLUB TURBAN" or the "Company"), headquartered at ".Sitelер mah. 101 Sok. No:3 Marmaris/Muğla", acting in the capacity of "Data Controller" under the Law No. 6698 on the Protection of Personal Data ("KVKK"), in order to inform you regarding the purposes of processing your personal data, to whom and for what purposes data may be transferred, data collection methods and legal grounds, and your rights pursuant to Article 11 of the KVKK.

1. PURPOSE

This Personal Data Protection Policy explicitly details the following on behalf of Grand Yazıcı Club Turban:

- The methods and legal grounds for collecting personal data,
- Which categories of data subjects' personal data are processed (Data Subject Categorization),
- Which categories of personal data are processed for data subjects (Data Categories) and sample data types,
- The purposes for which relevant personal data are used,
- To whom and for what purposes personal data may be transferred,
- Personal data sharing conducted with public institutions, organizations, and official authorities,
- What rights data subjects have regarding their own personal data and how they can exercise these rights.

Personal Data Collection Methods and Legal Grounds

Grand Yazıcı Club Turban collects personal data directly from the data subject, CCTV, contracted agencies, cookies, email, and other communication channels in audio, electronic, or written form, in accordance with the personal data processing conditions specified in the KVKK and in line with the legal grounds stated in this Personal Data Protection Policy.

These legal grounds, with respect to contracts concluded with Customers (Guests), subcontractors, suppliers, agencies (business partners), and tenants, include: the establishment and performance of the contract, the processing requirement arising from the law, the fulfillment of the Company's legal obligations, the establishment, exercise, or protection of a right, and in exceptional cases, legitimate interest.

Hazırlayan	Kontrol Eden	Onaylayan

	PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
		Issue Date	20.11.2019
		Revision Date	01.10.2026
		Revision No	02
		Page No	2/8

Data Subject Categorization

Grand Yazıcı Club Turban categorizes data subjects whose personal data are processed as follows:

- Customer (Guest)
- Visitor
- Online Visitor
- Business Partner / Supplier / Tenant Employee and/or Authorized Representative

Data Categories and Sample Data Types

No.	Data Subject	Data Category	Sample Data Types
1.	Customer/Guest	Identity Information	First Name-Last Name, Gender, TR ID Information (Wallet serial no, family sequence no, etc.), Passport Number, Vehicle Registration Information
		Contact Information	Address (home/work), Email, Phone / Mobile Phone
		Financial Information	Payment Information, Invoice Information, Credit Card Number, Bank Account Information
		Customer Information	Travel-Tour Records (Check-in and Check-out Dates, etc.), Activity Participation Information
		Special Categories of Personal Data	Health data (allergy status, disability status)

Hazırlayan	Kontrol Eden	Onaylayan

 GRAND YAZICI HOTELS & RESORTS MARMARIS	PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
		Issue Date	20.11.2019
		Revision Date	01.10.2026
		Revision No	02
		Page No	3/8

No.	Data Subject	Data Category	Sample Data Types
		Family Members and Relatives Information	Number of Children, First and Last Names of Children, Phone Numbers of Family Relatives, Passport Number
		Physical Space Security	CCTV
2.	Visitor	Identity Information	First Name-Last Name
		Corporate Identity Information	Company name, title
		Contact Information	Email, Phone / Mobile Phone
		Legal Transaction and Compliance Information	Signature
		Physical Space Security	Vehicle License Plate, CCTV
3.	Online Visitor	Identity Information	First Name-Last Name
		Transaction Security Information	Username, Law No. 5651 Logs, Traffic Information
4.	Business Partner / Supplier / Tenant Employee and/or	Identity Information	First Name-Last Name

Hazırlayan	Kontrol Eden	Onaylayan

	PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
		Issue Date	20.11.2019
		Revision Date	01.10.2026
		Revision No	02
		Page No	4/8

No.	Data Subject	Data Category	Sample Data Types
	Authorized Representative		
		Contact Information	Address, Email, Phone / Mobile Phone
		Financial Information	Invoice Information
		Legal Transaction and Compliance Information	Circular of Signatures, Power of Attorney, Signature
		Physical Space Security	CCTV

Purposes of Processing Personal Data

- Execution of necessary work by relevant business units and management of connected business processes to carry out commercial activities conducted by the Company
- Planning and execution of supply chain management processes
- Planning, auditing, and execution of information security processes
- Establishment and management of information technology infrastructure
- Tracking of Company finance and accounting matters
- Planning and execution of Company operational processes
- Planning and execution of internal and external training activities
- Management of relations with business partners and/or suppliers
- Tracking of contract processes and/or legal claims
- Planning and execution of sales processes of products and/or services
- Planning and execution of customer relationship management processes
- Tracking of customer requests and/or complaints
- Planning and/or execution of customer satisfaction activities
- Tracking of legal affairs and fulfillment of legal liabilities
- Fulfillment of obligations arising from legislation

Hazırlayan	Kontrol Eden	Onaylayan

	PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
		Issue Date	20.11.2019
		Revision Date	01.10.2026
		Revision No	02
		Page No	5/8

- Providing information to authorized institutions as required by legislation
- Planning and execution of necessary operational activities to ensure that Company activities are carried out in accordance with Company procedures and/or relevant legislation
- Planning and execution of Company audit activities
- Ensuring the security of Company premises and/or facilities
- Ensuring the security of Company operations
- Provision of Company premises and movables
- Creation of visitor records
- Execution of compensation and insurance processes regarding damage occurring in guest vehicles

To Whom and For What Purposes Personal Data May Be Transferred

Grand Yazıcı Club Turban transfers personal data to third parties solely for the purposes specified in this Personal Data Protection Policy and in accordance with Articles 8 and 9 of the Law.

Depending on the content and scope of the service received from third parties, pseudonymous data is used for transfer in all cases where the transfer of the data subject's personal data is not required.

The personal data subject to transfer mentioned above are protected legally through KVKK-compliant provisions included in our contracts, taking into account whether the counterparty of the legal relationship is a data controller or a data processor, in addition to technical measures ensuring their security.

No.	Data Subject	With Whom and For What Purpose Personal Data is Shared?
1.	Customer/Guest	Sharing customer data with contracted agencies to manage customer complaint processes; sharing customer data with contracted law firms to follow up legal processes; sharing with travel agencies providing transportation to the hotel for guests requesting transfers; sharing relevant personal data with insurance companies, agencies, and if necessary, lawyers/courts

Hazırlayan	Kontrol Eden	Onaylayan

	PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
		Issue Date	20.11.2019
		Revision Date	01.10.2026
		Revision No	02
		Page No	6/8

No.	Data Subject	With Whom and For What Purpose Personal Data is Shared?
		to conduct compensation and insurance processes for damages occurring in guest vehicles.
2.	Visitor / Online Visitor	Sharing log records with the internet service provider supplying infrastructure, and sharing relevant data with audit firms within the scope of audits during Company audits.
3.	Business Partner / Supplier / Tenant Employee and/or Authorized Representative	Sharing with healthcare institutions to provide necessary treatment in case of work accidents; sharing with lawyers to follow up legal proceedings.

Personal Data Sharing with Public Institutions and Official Authorities

No.	Data Subject	With Whom and For What Purpose Personal Data is Shared?
1.	Customer/Guest	Traffic information arising from internet usage offered at Company premises being shared with public institutions and organizations legally authorized to request this information within the scope of legal obligations (including but not limited to fighting crime, threats to state and public security, where the Company has a legal or administrative disclosure or notification obligation); sharing with official institutions to follow up legal proceedings.
2.	Visitor / Online Visitor	Sharing log records with official institutions; sharing camera recordings with official institutions such as the prosecutor's office and courts upon request.

Hazırlayan	Kontrol Eden	Onaylayan

	PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
		Issue Date	20.11.2019
		Revision Date	01.10.2026
		Revision No	02
		Page No	7/8

No.	Data Subject	With Whom and For What Purpose Personal Data is Shared?
3.	Business Partner / Supplier / Tenant Employee and/or Authorized Representative	Sharing personal data with relevant public institutions for accounting to make mandatory legal notifications; sharing invoice information with the Ministry of Finance during tax audits; sharing financial data with banks to fulfill payment obligations arising from commercial relationships.

Rights of Data Subjects Regarding Personal Data and How to Exercise Them

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

- To learn whether personal data is processed,
- To request information if personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data is transferred domestically or abroad,
- To request correction of personal data if it is incomplete or incorrectly processed,
- To request deletion or destruction of personal data within the framework of conditions stipulated in Article 7 of the KVKK Law,
- To request notification of operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom personal data has been transferred,
- To object to the occurrence of a result against the person oneself by analyzing processed data exclusively through automated systems,
- To demand compensation for damages in case of suffering damage due to unlawful processing of personal data.

As personal data subjects, to express your requests regarding your rights and to exercise your rights over your personal data, you can contact us via kisisilveri@grandyazicihotels.com or contact us using one of the methods specified in the application form available at <https://www.grandyazicihotels.com/club-turban-thermal/kvkk-ilgili-kisi-basvuru-formu>. If you submit your requests to us through the specified methods, the Company will conclude your request free of charge as soon as possible and within thirty days at the latest, depending on the nature of your request.

Hazırlayan	Kontrol Eden	Onaylayan

 PERSONAL DATA PROTECTION POLICY	Politika No	EK-7
	Issue Date	20.11.2019
	Revision Date	01.10.2026
	Revision No	02
	Page No	8/8

HARD COPY OLARAK KULLANILAMAZ

Hazırlayan	Kontrol Eden	Onaylayan