

UTE HOLDING A.Ş ANTALYA ŞUBESİ BELCONTI RESORT HOTEL

Enlightenment Notice On Processing Personal Data

Dear Guest;

We, as Ute holding a.ş Antalya şubesi Belconti Resort Hotel (hereinafter referred to as "Hotel"), place a great importance on the protection of your personal data. We have been processing your personal data in accordance with Personal Data Protection Law No. 6698 ("PPDL"), as data controller, and within the following purposes and limits described below. We have been paying strict attention to take the necessary administrative and technical measures, and therefore, we would like to inform you about our course of processing of your personal data, and your rights under PPDL through this Enlightenment Notice on Processing Personal Data ("Notice").

1. Your Personal Data that we have processed

As you are a Belconti Resort Hotel customers, we are required to ask you and/or your family members for information such as the following:

- Identification information (e.g. name, surname, TR identification number)
- Contact information (e.g. phone number, e-mail address)
- Personal information (e.g. date of birth, nationality)
- Information about your children (e.g. name, date of birth, age)
- Your credit card number (for bank transactions and booking purposes)
- Your arrival and departure dates
- Your preferences and interests (e.g. smoking/non smoking room, preferred floor, pillow type, newspaper/magazine type, sports, cultural interests)
- Your questions/comments while you are staying, or after you have stayed in one of our facilities.
- Sensitive health data (e.g. blood type, illnesses, allergies, etc.) that we process in order to serve you better and to look after your health

Information collected about people under the age of 18 are limited to name, nationality and birth date. This information can only be provided to us by an adult.

(All data listed above in the text shall collectively be referred to as "Personal Data")

2. Time to Obtain Your Personal Data

Personal data may be collected in certain conditions, including:

A. Hotel Activities:

- Room bookings
- Check in and payment
- Eating and drinking in the hotel bar during a stay
- Requests, complaints, and/or disputes.

B. Participation in marketing program or events

- Participating in customer surveys (e.g. Guest Satisfaction Survey)
- Online games or competitions
- Subscribing to bulletins in order to receive offers and promotions via e-mail

C. Data communication from third parties

- Tour operators, travel agencies, GDS booking systems and others

D. Internet activities

- Connection to Belconti Resort Hotel websites (IP addresses, cookies)
- Online forms (online booking, surveys, Belconti Resort Hotel pages in social networks, logon systems via network like Facebook login etc.)

2. Method of Processing Your Personal Data and Legal Cause

Your Personal Data can be collected and processed by automated or non-automated methods, by the related departments of the hotel or other authorised departments, via methods and means listed below. This is in order to carry out accommodation and other service processes, and/or to fulfil all obligations of the hotel, including legal obligations in accordance with Article 3 of the Notice, within the scope of fulfilling the requirements of the accommodation and of service processes.

- By hand, or via hotel websites, electronic mail, mail, through references or partners and suppliers of the Hotel (e.g. travel agencies, tour companies, booking websites), and/or via websites, or social media accounts;
- Information obtained during interviews that may be held in various ways (face to face, by telephone, teleconferencing, video conferencing, facsimile, etc.)
- Your personal data is processed in accordance with the following legal conditions set out in the Article 5 of Law No. 6698;
 - i. Where your explicit consent exists,
 - ii. Where it is explicitly prescribed by law,
 - iii. Where you fail to explain your consent due to actual impossibility, or where it is obligatory that your personal data is processed in order to protect your integrity, or someone else's life or body in cases where legal validity is unrecognised,
 - iv. Where the personal data is processed regarding the establishment or performance of a contract,
 - v. Where it is compulsory for our legal obligations to be fulfilled,
 - vi. Where the personal data is publicised by the owner itself,
 - vii. Where data processing is mandatory for the establishment, use or protection of a right, and
 - viii. Where data process is obligatory for our legitimate interests; provided that it does not harm your fundamental rights and freedoms,

Your Special Health Data is processed based on your explicit consent, or in case of the fulfilment of conditions specified in Article 6 of the Law.

Your personal data is processed in accordance with Identity Reporting Law No. 1774, Tax Procedure Law No. 213, Turkish Commercial Code No. 6102, Personal Data Protection Law No. 6698, and other relevant legal legislations.

The Hotel complies with the data processing principles and obligations specified in the Constitution of the Republic of Turkey, international contracts where our country is a party, EU data protection legislations and relevant legislation, particularly PPD, when processing Your Personal Data.

3. Processing Personal Data of Special Nature

Article 6 of the Personal Data Protection Law No. 6698 describes a set of personal data which has a risk to cause victimisation or discrimination of people when it is processed illegally as "personal data of special nature". This includes biometric or genetic data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures. Our hotel complies with the regulations specified in the Personal Data Protection Law, ensuring the protection of this sensitive data.

Our hotel processes your personal data of special nature in compliance with the Personal Data Protection Law in the following situations, provided that the adequate measures, which will be determined by the Personal Data Protection Board, are taken:

A. In Case Your Explicit Consent Exists

Personal data of special nature, such as your current condition, can be shared with the Hotel for the purpose of requesting customised services for yourself (For example; requesting a thin pillow due to a neck hernia, requesting a room on the first floor due to heart condition, requesting a dessert to be prepared without nuts due to peanut allergy, serving gluten-free meals due to gluten allergy etc.). Our hotel will process your personal data of special nature only with your explicit consent, for the purpose of offering you a customised service intended for the needs that you have specified, and to offer the same services again in the future, remembering your needs.

B. In Case Your Explicit Consent does not Exist

Your personal data of special nature, other than your sensitive health data, is processed in cases stipulated by law, Your personal data of special nature regarding your health is only processed by persons or authorised public institutions and organisations that have confidentiality obligations for the purposes of protecting public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services, as well as their financing.

4. Purposes of Processing Your Personal Data

Your Personal Data is processed for the purposes set out below:

A. To fulfil our obligations against our customers.

B. To manage room reservations and accommodation requests:

- To create and store legal documents in accordance with accounting standards.

C. To manage hotel accommodations:

- To monitor your service uses (telephone, bar, room service etc.)
- To manage room access
- Administration of the list of customers who behave inappropriately during their stay in the Hotel (aggressive and antisocial behaviours, failure to comply with the hotel contract, failure to comply with safety regulations, theft, occasions regarding damage or payment)
- To develop our Hotel services particularly in the following area:

- To carry out marketing activities, to advertise brands and to process your personal data at marketing programs for customers, in order to better understand your needs and requests
 - To adapt our products and services in order to better meet your needs
 - To customize commercial offers and promotion messages that we have sent to you
 - To inform you about special offers and new services created by Belconti Resort Hotel,
 - To manage our relationships with customers before, during and after accommodation:
 - To provide details regarding our customer database
 - Classifications based on the reservation history and the customers' travel preferences, in order to send targeted communications
 - To predict and foresee future behaviours
 - To improve statics and commercial scores and carry out reporting
 - To provide context data for the offer submission tool, when customers visit a group website or make a reservation,
 - To know and manage new and old preferences of customers
 - To send bulletins, promotions, and tourism, hotel or service offers or to contact with you via telephone
 - To manage unsubscribing requests of bulletins, promotions and tourism offers, and satisfaction surveys
 - To consider the right of objection
 - To benefit from special telephone services to search for people staying at our hotel in case of serious events (natural disasters etc.) that affect aforementioned Hotel stay
 - To use a trusted third party in order to determine your interests and your customer profile, give you personalized offers, cross check and analyse your data collected at the time of booking or during your stay, and to implement certain systems to your data.
 - To develop Belconti Resort Hotel services, particularly at the following areas:
 - To conduct a survey and analyse customer comments
 - To manage claims/complaints
 - To assure and develop our Hotel's Website use at the following areas:
 - To develop navigation
 - To implement security and fraud prevention systems
 - To fulfil the obligations of the relevant legislations (for example; retaining accounting documents)
- Apart from this, the main purpose of processing your personal data is to give a better host experience, and enable our valued guests to benefit from our services more and without interruption.

5. Transfer of personal data in Turkey and abroad

For the purpose of providing services within the hotel.

Your personal data can be accessed by companies and/or branches of UTE Holding A.Ş. and our business partners, and is transferred to these companies as necessary.

Our hotel has been working with different companies both in Turkey and abroad, and at times, related companies can access company programs in order to provide support, therefore access to personal data can be enabled in terms of business continuity and productivity by Hotel control. In this context, it is also possible to access your personal data, and to transfer your personal data in Turkey and abroad.

Under the control of the Hotel, your personal data can be transferred to (in Turkey and abroad), and/or accessed by organisations providing storage, archiving, or information technology support (server, hosting, cloud computing, e-mail and others) located in the country and abroad, or financial institutions cooperating and/or receiving services, GSM companies, performance evaluation companies, consulting firms receiving support in law and similar fields, third parties providing support in other areas regarding side benefits and the activities of the Hotel, other third persons to whom the transfer is necessary for specified purposes, or our business partners and authorised institutions and organisations.

All obligations are fulfilled by the Hotel, in accordance to the Personal Data Protection Law No. 6698 and relevant legislations during the transfer of your data in Turkey and abroad.

Within the frame of legal obligations and in case of necessity, Your Personal Data can be transferred to government agencies, judicial bodies, or foreign missions established with international agreements (embassies, consulates, etc.)

6. Duration of Processing Your Personal Data

If there is a period specified by relevant legislation for retaining these data, Your Personal Data shall be

processed until the end of this period, or if such a period is not specified, then until the end of the required time for the processing purpose.

In the event of the expiration of this period, Your Personal Data shall be immediately erased, destructed or anonymised in accordance with the rules of the legislation, ex officio or upon your demand.

If there is a change in your Personal Data during this period, you are obliged to inform the Hotel in order that your records are kept updated and accurate.

7. Surveillance of the Hotel by Camera

Entrances and exits of hotel facilities, corridors, common areas of the facilities are monitored by cameras for the purpose of facility security, customer safety, and occupational health and safety, and a camera sign is placed to the indicated areas.

We would like to state that your rights under the Constitution and PPDL are reserved in relation to this footage.

The purpose of camera surveillance and recording is to detect incidents which can occur at the workplace, such as robbery.

These records can be accessed only by the authorised departments of the Hotel.

Records are only retained for the period specified in the relevant laws and regulations for security purposes, and are destroyed at the end of the period.

8. Your Rights under PPDL As Data Subject (Article 11)

In accordance with PPDL and the other applicable legislation, you have the right;

- i. to learn whether Your Personal Data are processed or not,
- ii. to request information if Your Personal Data are processed
- iii. to learn the purpose of Personal Data processing and whether this data is used for intended purposes,

- iv. to know the third parties to whom Your Personal Data is transferred to, within the country or abroad,
- v. to request the rectification of the incomplete or inaccurate data, if any,
- vi. to request the erasure or destruction of Your Personal Data under the conditions laid down in PPDL legislation
- vii. to request notification of the operations carried out in compliance with sub- paragraphs (v) and (vi) to third parties to whom Your Personal Data has been transferred,
- viii. to object to processing, exclusively by automated means, of your personal data, which leads to an unfavourable consequence for the data subject,
- ix. to request compensation for the damage arising from the unlawful processing of Your Personal Data.

9. Means to Apply to Hotel within the Scope of Your Rights

As mentioned before, we will be happy to assist you in exercising your rights as described above, please feel free to contact us directly by sending an e-mail to our address below: info@belconti.com

We respectfully submit this issue for your attention.

UTE Holding A.Ş – Belconti Resort Hotel