

# PERSONAL DATA PROTECTION AND PRIVACY POLICY

## **Website Confidentiality Agreement**

During your visit to this website and your use of the service through this website, how the information that we receive regarding you and the services you request will be used and protected are subject to this “Confidentiality Agreement”. You hereby accept the conditions stipulated in this “Confidentiality Agreement” when you visit this website and request to use the services we provide through this website.

## I. PURPOSE OF PERSONAL DATA PROTECTION AND PROCESSING POLICY

Until today, data and information of our customers or potential customers are kept confidential and have never been shared with third parties by virtue of the sensitivity of our business as “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”. Protection of personal data is the main policy of our company. Even before any legal regulation, our company and subsidiaries had attached great importance to the confidentiality of personal data, adopted it as a working principle and gave working instructions to the employees in compliance with this principle. As “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”, we undertake to adhere to all responsibilities of the Personal Data Protection Law. The principle of our companies to protect personal data also covers our subsidiaries.

## II. SCOPE AND AMENDMENT OF PERSONAL DATA PROTECTION AND PROCESSING POLICY

This Policy prepared by our company has been regulated in accordance with the “Law on Protection of Personal Data” no. 6698 (“KVKK”). The law has entered into force with all of its provisions as of today. The data obtained with your consent or in accordance with the other law specified in the law will be used to improve the quality of our services and to improve our quality policy. Again, some of the data we obtain are removed from the scope of personal data and anonymized. These data are used for statistical purposes and not subject to the enforcement of Law and our Policy. “Personal Data Protection and Implementation Policy of Öz Turizm Otelcilik ve Tic. A.Ş. and Öz Turizm Otelcilik Ltd. Şti., and Alta Turizm Otelcilik ve Tic. A.Ş.” aims to protect data that is automatically acquired from our current and potential customers, employees, customers and employees of our solution partners, and other persons and includes the implementations regarding these data. Our company has the right to change our policy and Regulation - provided that it is in compliance with the law and better protection of personal data.

## III. GENERAL PRINCIPLES ON PROCESSING OF THE PERSONAL DATA

- a) Being in compliance with the law and good faith: “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” question the source of the data

it collects or sent by other companies and attaches importance to handling these in compliance with the law and good faith. Within this framework, it warns and notifies the third parties (agencies and other intermediary firms) that sell the services provided by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” to protect the personal data.

- b) Being accurate and up to date, if necessary: “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” attach importance to the accuracy of all of the data kept within the organization, to the fact that they do not include any misinformation and that personal data are updated only if the changes are notified.
- c) Being processed for specified, explicit, and legitimate purposes: “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” process the data limited to the services and purposes for which consent of the persons are taken during the services. It shall not process, use and make use of the data out of business purposes.
- d) Being relevant, limited and proportionate to the purposes for which data are processed: “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” use the data only for processing purposes and to the extent what the service requires.
- e) Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected: “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” keep the contractual data as long as it is required by the commercial and taxation law as well as the periods of conflicts of law. Nevertheless, it shall delete or anonymize the data in case the reasons necessitating their processing cease to exist.

It is crucial to state that whether “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” collect or process the data by one’s will or in compliance with the law, the provisions mentioned above shall apply anyhow.

You shall have the following rights pursuant to Article 11 of Law on Protection of Personal Data. A separate application was prepared by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” for you to facilitate your related rights.

The persons whose personal data have been processed may apply to our official announced on our website by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” and shall be entitled to;

- a) Learn whether or not your personal data have been processed,
- b) Request information as to processing if your data have been processed,
- c) Learn the purpose of the processing of the personal data and whether data are used in accordance with their purpose,
- ç) Know the third parties in the country or abroad to whom personal data have been transferred,
- d) Request rectification in case personal data are processed incompletely or inaccurately,
- e) Requesting the deletion or destruction of personal data in accordance with the conditions stipulated in the law,
- f) Request notification of the operations made as per clauses (d) and (e) to third parties to whom personal data have been transferred,
- g) Object to occurrence of any result that is to your detriment by means of an analysis of personal data exclusively through automated systems,
- h) Request compensation for the damages in case the person incurs damages due to the unlawful processing of personal data. As “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”, we respect these rights.

#### **Maximum Savings Policy/Scrimping Policy**

Pursuant to our policy called as maximum savings policy or scrimping policy, the data received by

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” are processed into the system as required. Thus, which data we will collect shall be determined according to the purpose. Unnecessary data shall not be collected. Other data submitted to our company are transferred to the information system of the company in the same way. Redundant information is not stored in the system; they are deleted or anonymized. These data may be used for statistical purposes. Health data among the special quality data are only kept in the system to provide better service to the customers and to protect their health.

#### **Deletion of Personal Data**

When the retention period necessitated by the law expires, judicial procedures are completed, or other requirements no longer exist, these data shall be deleted, removed or anonymized automatically, by the company or upon the request of the relevant person.

#### **Accuracy and Currency of Data**

The data within the bodies of “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” are processed as declared by the relevant persons as a rule. “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” are not obliged to check up on the accuracy of the data declared by the customers or the persons in touch with our companies, and it is also contrary to the Laws and our working principles. The declared data are regarded as correct and accurate. The principle of accuracy and currency of personal data has also been adopted by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”. The personal data processed upon the request of the relevant person or from official documents that are submitted to our company are updated. Necessary precautions are taken for this purpose.

#### **Confidentiality and data security**

Personal data are confidential and “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” obey the rule of confidentiality. Only authorized persons shall access personal data. All necessary technical and administrative measures are taken to protect the personal data collected by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”, and to prevent the damage on our customers and potential customers. Within this framework, it shall be ensured that the software complies with the standards, third parties are selected with caution and data protection policy is observed within the company.

## **IV. PURPOSE OF DATA PROCESSING**

Collection and processing of personal data by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” shall be executed in line with the purposes stipulated in the letter of clarification. The data are collected and processed to draw up contracts and provide better services to the customers.

## V. DATA OF CUSTOMER, POTENTIAL CUSTOMER AND BUSINESS AND SOLUTION PARTNERS

### **Collection and processing of data for a contractual relationship**

In the case of a contractual relationship with our customers and potential customers, the collected personal data may be used without the approval of the customers. However, this use shall be for the purpose of the contract. The data shall be used for better execution of the contract and as required by the services and updated, if necessary, by contacting the customers. Nevertheless, the data provided to us by our potential customers shall be processed to easier and more quality services later. These data shall be deleted upon requests in case of lack of any contractual relationship.

### **Data of Business and Solution Partners**

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” adopt as a principle to act in compliance with the laws when exchanging the data both with business and solution partners. The data are shared with the business and solution partners with the understanding of data confidentiality and as required by the services, and it is ensured that these parties take measures regarding data security.

### **Data processing for advertisement purposes**

The Law on the Regulation of E-Commerce on The Law on Commercial Communication and Commercial Electronic Messages for advertisement purposes can only be sent to the persons with prior consent in compliance with the law. Explicit consent of the person is required to send advertisements. “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” obey the details of ‘‘the consent’’ specified in the same legislation. The consent to be obtained should cover all commercial electronic messages that are sent to the electronic communication addresses of the recipients to promote and market the goods and services of the company, to promote the business or to increase the recognition level of the company with contents including greetings and wishes. This consent may be obtained via any electronic communication channel or at a physical medium in written form. The important thing is to obtain the declaration of the recipient that he/she accepts to receive commercial electronic messages and to have his/her full name and electronic communication address.

### **Data processing due to the legal obligations of the company or being stipulated explicitly in the law**

Personal data may be processed without prior consent when it is stipulated explicitly in the relevant legislation or to fulfil a legal obligation specified in the legislation. Type and scope of the data processes are required for data processing activity that is permitted by the Laws, and they should comply with the relevant legal provisions.

### **Data processing of the company**

Personal data may be processed pursuant to the legal purposes and the services of the company. However, the data shall not be used for services contrary to the laws under any circumstances.

### **Processing of special quality data**

According to the Law, race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothes, membership of an association, foundation or union, health, sexual choice, juridical sentence and data regarding safety measures and biometric and genetic data are among the special quality data. “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” take adequate measures determined by the Board for the processing of special quality data as well. “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve

Tic. A.Ş” may process the special quality data only for the corresponding purposes to provide better services.

#### **Data processed with automatic systems**

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” act in compliance with the law for data processed with automatic systems. The information obtained from these data without the explicit consent of the persons shall not be used against the person. However, “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” may take decisions regarding the persons that will perform the process by using the data within the system.

#### **User Information and Internet**

In case of the collection, processing and use of personal data on the websites and other systems or applications belonging to “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”, the related persons shall be informed about the privacy statement and cookies if needed. The persons shall be informed about our applications on our websites. Personal data shall be processed as per the law.

We submit the below-mentioned information about the cookies that we use/will use on our pages when you visit our website.

### **Purpose of Use of Cookies**

#### **Type of Cookies**

Google (analytics, doubleclick)  
Measurement Advertisement In-site optimization  
Functional and analytic cookies Commercial cookies  
Facebook  
Advertisement  
Commercial cookies  
Insider  
Measurement Advertisement In-site optimization  
Functional and analytic cookies Commercial cookies  
Measurement In-site optimization  
Functional and analytic cookies Commercial cookies  
3rd party companies (EYULA)  
Advertisement  
Functional and analytic cookies Commercial cookies

**Functional and Analytic** Cookies includes the data about reminding your choices, using the website effectively, optimizing the website to answer the demands of the user and how the visitors use the website. By qualification, these kinds of cookies may consist of personal information such as user name.

#### **Third-Party Cookies**

Websites/mobile applications/mobile websites, belonging to “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”, work with third-party reliable and known advertisement providers. Third-party service providers place their own cookies to offer advertisements special to you. The cookies placed by third party collect, process the surfing information of the visitors on the websites and analyze them according to the ways of use.

#### **Commercial cookies**

Commercial cookies serve to offer the product/content with similar qualifications and enhance the user

experience by providing a developed and customized advertisement portfolio according to the user's fields of interest and choices. The holdup time of the session, permanent, functional and analytic and commercial cookies on the background are about 2 (two) months and the required settings can be done by browser settings. The removal operation, one of the settings, can be changed through the browser.

During your reservation process, if your transaction is not completed due to errors or failures in the system, our call center representative will contact you.

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### **How to clear cookies?**

Many browsers are adjusted automatically to accept and use the cookies as of the first instalment of your computer. You are allowed to block the cookies or to be warned about the cookies by using help or setting menus of your browser. You can take advantage of the instruction or help option screens of your browser to obtain further information about the various methods of managing cookies or regulate the settings of your browser.

### **Telecommunication and internet**

The computers, telephone, e-mail and other applications allocated to the employees within the company shall only be used for business purposes. The employee cannot use any of these means allocated to himself/herself by the company for private purposes or communication. The company may control and monitor the data on these means. The employee undertakes not to keep any data or information apart from the business purposes on the computer, telephones or other means allocated to himself/herself as of his/her employment date.

## **VI. DATA OF OUR EMPLOYEES**

### **Processing of the data for business relations**

Personal data of the employees may be processed without obtaining consent to the extent of requirements of health insurance and business relations. However, "Öz Turizm Otelcilik ve Tic. A.Ş" and "Öz Turizm Otelcilik Ltd. Şti" and "Alta Turizm Otelcilik ve Tic. A.Ş" hereby undertake the protection and confidentiality of the data of the employees.

### **Processing as per Legal Obligations**

"Öz Turizm Otelcilik ve Tic. A.Ş" and "Öz Turizm Otelcilik Ltd. Şti" and "Alta Turizm Otelcilik ve Tic. A.Ş" may also process the personal data of the employees without obtaining a separate consent to fulfil a legal obligation stipulated in the legislation or in case it is explicitly specified in the legislation. This case is limited to the obligations arising from the law.

### **Processing in Favor of the Employees**

"Öz Turizm Otelcilik ve Tic. A.Ş" and "Öz Turizm Otelcilik Ltd. Şti" and "Alta Turizm Otelcilik ve Tic. A.Ş" may process the personal data without obtaining the consent for the procedures in favour of company employees like private health insurances. For the disputes arising from the business relations, "Öz Turizm Otelcilik ve Tic. A.Ş" and "Öz Turizm Otelcilik Ltd. Şti" and "Alta Turizm Otelcilik ve Tic. A.Ş" may also

process the data of the employees.

#### **Processing of special quality data**

Pursuant to the Law, race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothes, membership of an association, foundation or union, health, sexual choice, juridical sentence and data regarding safety measures and biometric and genetic data are among the special quality data. Besides the consent of the relevant person, “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” also take adequate measures determined by the Board for the processing of special quality data. Special quality data may be processed limited to and related to the cases permitted by the law without the consent of the person. The quality data obtained from the employees shall only be used for the corresponding purpose to allow them to benefit from the insurance and health services.

#### **Data processed with automatic systems**

The data processed regarding the employees with automatic systems may be used for in-house promotions and performance assessments. Our employees reserve the right to appeal to the results against them, and they should perform this process in compliance with the internal procedures. Appeals of the employees shall be evaluated again within the company.

## **VII. TRANSFERRING OF THE PERSONAL DATA DOMESTICALLY AND INTERNATIONALLY**

Personal data may be shared with business and solution partners and subsidiaries for the purpose of providing the services by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”.

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” will be entitled to transfer the personal data for certain purposes to the following person and institutions;

- » Business partners of “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” limited to the purpose of execution of the aims of the establishment of the business partnership,
  - » The suppliers of “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” to the extent of providing the necessary services by our Company to fulfil its commercial activities and procured by the supplier as external sources,
- “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” are authorized to transfer the personal data domestically and internationally within the conditions determined by the Board and in compliance with the other provisions in the law and depending on the consent of the person.

## **VII. RIGHTS OF THE RELEVANT PERSON**

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” hereby agree that the relevant person must provide his/her consent before processing the data within the scope of the law and he/she reserves the right to determine the destiny of the data after the data is processed.

Regarding the personal data, a user, whose data is processed, hold the right to do the following by contacting our relevant employee, whose contact details are announced on our official website by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”;

- a) To be informed whether his/her personal data are processed or not,
- b) To request information if the personal data are processed,
- c) To learn the purpose of processing the personal data and whether the data are used for the corresponding purposes,
- ç) To get information on the third parties to whom the personal data are transferred in the country and abroad,
- d) In case the personal data are processed incompletely or inaccurately, to request the correction,
- e) To request that personal data are deleted or removed within the framework of the conditions stipulated in article 7,
- f) To request that the processes performed as per clause (d) and (e) are notified to the third parties to whom the personal data are transferred,
- g) To appeal to the negative results against himself/herself arising from the analysis of the data processed exclusively through the automatic systems,
- h) In case the personal data are damaged due to the processing of the data contrary to the law, to request that the damages are indemnified. Nevertheless, the persons do not reserve any right on the anonymized data within the Company. “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” may share the personal data as required by a juridical function or governmental authority as per the business and contractual relationship.

The owners of the personal data shall submit their requests regarding the rights mentioned above to the following contact address by filling out and putting their wet signatures on the application form given at [www.vshotels.com](http://www.vshotels.com), the official website of the company, through registered letter with return receipt with the copies of their identity cards (only front page for birth certificate). The applications shall be replied within the shortest time according to the content of the application within 30 days at the latest after the delivery to the company. You need to apply with a registered letter with return receipt. Besides, only the questions about you shall be replied and any applications made regarding your spouse, relative or friends shall not be accepted. “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” may request other relevant information and documents from applicants. may request other relevant information and documents from applicants.

## IX. CONFIDENTIALITY PRINCIPLE

The data of the employees and other persons within “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” is confidential. Nobody can use, reproduce, copy and transfer to others for purposes other than contractual or legal purposes, as well as use them for purposes other than business purposes.



## X. PROCESS SECURITY

All necessary technical and administrative measures are taken to protect the personal data collected by “Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş”, and to prevent the damage on our customers and potential customers. Within this framework, it shall be ensured that the software complies with the standards, third parties are selected with caution and data protection policy is observed within the company. Precautions with respect to security are continuously renewed and upgraded.

## XI. INSPECTION

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” carry out the internal and external inspections for protection of the personal data.

## XII. NOTIFICATION OF VIOLATIONS

“Öz Turizm Otelcilik ve Tic. A.Ş” and “Öz Turizm Otelcilik Ltd. Şti” and “Alta Turizm Otelcilik ve Tic. A.Ş” shall immediately act to remedy the violations in case a violation of personal data is notified. It shall mitigate or indemnify the damage of the relevant person. In case the personal data are obtained by the unauthorized parties, it immediately notifies The Board of Personal Data Protection.

Regarding the notification of the violations, you can also make an application as per the procedures provided at [www.vshotels.com/tr/kvkk](http://www.vshotels.com/tr/kvkk)

### **Requests made pursuant to the Act on the Protection of Personal Data**

As announced on [www.vshotels.com/tr/kvkk](http://www.vshotels.com/tr/kvkk) to put your application into the process, please complete the form on the websites, attach a copy of your identity card, and send it to the address written on the form via registered mail.

The rights concerning personal data will only be used for one’s own data. Requests for data of persons other than the person who completed the form and attached his/her own photocopy of the identity card to the form shall not be taken into consideration. Forms without identity card photocopies will not be taken into consideration. Please be informed that even if data deletion requests are fulfilled, we are required to share data with the authorities if requested.

[CLICK HERE FOR THE APPLICATION FORM](#)