



CLARIFICATION DOCUMENT REGARDING THE PERSONAL DATA PROCESSING

Each of our AKKA Antedon Otel, AKKA Alinda Otel and AKKA Claros Otel that are contained within the body of AKKA Hotels displays maximum sensitivity for the safety of your personal data. Within this context, we attach great importance to process, record, transfer, share and store all kinds of personal data that belong to all persons affiliated with our Company, including people who benefit from our products and services, in accordance with the Law on the Protection of Personal Data, numbered 6698 (“KVK Law”). Within the scope of 10th Clause, titled “Clarification Obligation of Data Supervisor” and 11th Clause, titled “Rights of the Related Person”, of the Law on the Protection of Personal Data, numbered 6698 (“KVKK), we would like to release information to you regarding the reasons why your personal data will be processed, to whom and why your processed personal data will be transferred, the method of gathering your personal data, legal reasons of processing your personal data and the rights you have by means of this “**Clarification Document**” that we prepared in order to fulfil the obligation of **AKKA İNŞ. TUR. TİC. A.Ş. as the Company which acts in the capacity of Data Supervisor** to clarify its customers, business partners and the affiliated natural or legal persons.

Personal Data and Sensitive Personal Data

According to KVK Law;

Personal data include all kinds of information about a natural person whose identity is clear or can be defined and data concerning race, ethnic origin, political opinion, philosophical belief, religion, denomination, other beliefs, fashion, association, foundation or union membership, health, sexual life, conviction and security measures of persons; and Sensitive Personal Data include biometrical and genetic data.

The Purpose of Legislative Regulation

The 1st Clause of the Law on the Protection of Personal Data, numbered 6698, states that “the purpose of this Law is to protect fundamental rights and freedoms of persons in processing personal data, particularly the right to privacy, and to regulate the obligations of natural and legal persons who will process the personal data and procedures and principles to which they will obey.”

Information on Types of Personal Data to be Gathered

- a) Credentials (Your Name, Surname, sex, title, date and place of birth, nationality; other credentials provided from passport, visa or documents given by the government);
- b) Contact Information (Home and workplace addresses, phone number and e-mail address and other contact information about you which we may obtain via third parties, travel agencies or other similar suppliers that we cooperate)
- c) Your Preferences and Interests (Your service preferences, check-in and check-out dates, purchased goods and services, special demands, room type, preferred floor, newspaper/magazine type, sportive and cultural interests, facilities, holiday preferences, requested services, information that you provide on other persons, ages of kids, guest accommodation services)
- d) Credit card and debit card numbers,
- e) Information on online user account,
- f) Your personal data received from Travel Agency regarding the Hotel Accommodation or information on meetings and events
- g) Visual data and records obtained through telephone switchboard,
- h) Account identity or user identity on social media
- i) Other personal or sensitive personal information that you provided to us or service providers regarding the services
- j) Access information which are generated while you are using information technologies of Hotel (Such as IP, MAC, Location etc.)

The Purpose of Processing Your Personal Data and To Whom and Why Your Personal Data to be Transferred

We gather your personal data within the frame of limits designated by the formal legislation in order to enable you to benefit from products and services that we offer to you at the top-quality by customizing them according to taste and habits of you esteemed guests and process your personal data within the scope of conditions and purposes stipulated in 5th and 6th clauses of the Law, numbered 6698. We share your personal data with our subsidiaries located within the borders of Republic of Turkey and/or any other foreign country, directly or indirectly affiliated companies and joint ventures or state institutions and organizations which are authorized to request such data because of a legal obligation and with other institutions, suppliers, authorized sellers, authorized dealers and business partners that concluded agreements with us with regard to our activities in order to offer value added services and opportunities to our customers and to improve the quality of service. In addition to these, your personal data will be processed within the scope of conditions and purposes stipulated in 5th and 6th clauses of the Law, numbered 6698, in order to:

- a) Carry out the transactions that fall within the principal business activities of the Company in accordance with the law;
- b) Offer products and services to you; fulfil our obligations against you; issue necessary records and documents; comply with information storage, reporting, informing, tax and other obligations stipulated by the local and international legal statute;
- c) Provide and offer special advertisements, campaigns, advantages and other opportunities for you in order for sales and marketing activities with the intention of improving the quality of services and products;
- d) Generate the reports with the purpose of sale and marketing activities and execute CRM studies;
- e) Measure and increase the customer satisfaction; receive your opinion and suggestion concerning complaint management and new services and products; provide information to you regarding your requests and demands;
- f) Communicate with you customers in case of emergency;
- g) Comply with information storage, reporting and informing obligations stipulated by government institutions; meet the requirements of contracts and fulfil the legal obligations to which AKKA Hotels is subjected regarding benefiting from these services;
- h) Manage communication, marketing survey, purchasing and order transactions, corporate business procedures that are carried out by AKKA Hotels and follow up judicial processes;
- i) Investigate, evaluate and reply to demands received from official authorities or you.

The Cases In Which Your Personal Data May be Processed without Your Explicit Consent Pursuant to Laws

Our Company may process your personal data, which it gathered in accordance with the law and methods stated above, without seeking for your explicit consent provided that following conditions, specified in 5th clause of the KVKK, exist:

- a) It is clearly stipulated by Laws.
- b) It is obligatory to protect the life or physical integrity of the person or someone else who is in a condition of expressing his/her consent due to physical impossibility or whose consent does not gain legal validity.
- c) It is necessary to process personal data owned by the parties of a contract on the condition that it is directly related with concluding or execution of a contract
- d) It is required in order to enable data supervisor to perform her/his obligations.
- e) It is made public by the relevant person through her/his own free will.
- f) It is mandatory to process data in order to establish, exercise or protect a right.
- g) It is obligatory to process data for the legitimate interests of data supervisor provided that fundamental rights and freedoms of the related person are not harmed.

The Method and Legal Reasons of Data Gathering

In accordance with the objectives to offer the products and services provided by our Company at the top quality and in compliance with laws and to ensure that our Company fulfils its obligations arising from the contracts concluded with the business partners and the relevant laws completely and properly, your personal data are gathered verbally, electronically or in writing by AKKA Hotels via online services like our website and other contracted websites, via all kinds of physical medium through which verbal and written information is shared and customer services, over other sources such as our business partners, suppliers and travel agencies, via social media accounts within the scope of legal

statute provided that it falls within the abovementioned objectives or it is directly associated with drawing up or executing an agreement or it is required in order to fulfil our legal obligations and other events listed in the 5th clause of the Law.

Processes Through Which Your Personal Data to be Gathered

Personal data may be gathered in various circumstances including but not limited to the following:

- Reservation for a hotel room and payment transactions
- Check-in and check-out processes to hotel
- Execution of services offered by the hotel
- Requests, complaints, suggestions and/or disputes
- Hotel activities and event schedules
- Marketing and promotion programs and activities
- Participation in the customer surveys (for example: Customer Satisfaction Survey)
- E-mails and bulletins
- Tour operators, travel agencies, reservation systems and others
- IP addresses, identification data
- Online forms (Such as online forms published in our web-sites).

Duration of Storing Personal Data

In compliance with the KVK Law, your personal data, which are processed with the purposes declared in this “Clarification Document Regarding the Personal Data Processing” will be erased, destroyed or kept to be used following the anonymization when the reason which requires your personal data to be processed pursuant to clause 7/f.1 of KVK Law disappears and/or when the legal duration, during which we are obliged to process your data pursuant to legislation, expires.

Rights of Personal Data Owners

Within the scope of 11th clause and entire KVKK, we inform you that you have the following rights regarding your personal data:

- a) Learn whether your personal data are processed or not;
- b) Demand information regarding processing your personal data in case they are processed;
- c) Learn the purposes of processing your personal data and whether your data are used suitable for the relevant purposes or nor;
- d) Learn the third parties to whom your data are transferred within the borders of our country or abroad;
- e) Ask for correction in case your data are processed deficiently or improperly;
- f) Request your personal data to be erased or destroyed within the scope of conditions stipulated in the 7th clause;
- g) Ask to notify the third parties, to whom your personal data are transferred, regarding the procedures carried out pursuant to subsections (e) and (f);
- h) Object to any negative consequence that you face due to the fact that your personal data are exclusively analysed through automated systems;
- i) Demand to be indemnified in case you suffer a loss since your personal data are processed illegally.

When you would like to exercise your rights stipulated in the 11th clause of the Law on Personal Data Protection you shall submit your applications in person to our Company or through the following registered electronic mail address: akkaturizm@hs03.kep.tr after filling the KVKK Knowledge Acquisition Form, which is provided in our web-site. Your demands that you pointed out in your application will be finalized free of charge within 30 days at the latest. However, in case such transaction causes any additional cost for the Company then a fee, the amount of which is stipulated in the Notification concerning Rules and Procedures of Applying to Data Supervisor issued by The Board of Protection of Personal Data, may be requested from you.