

# **Protection of Personal Data Information Notice** for Guests

According to the Personal Data Protection Law No. 6698 ("Law"), ÖZ İNŞAAT TUR. PET. GIDA SAN. VE TİC. LTD. ŞTİ. (hereinafter referred to as "SİDE PREMIUM") is defined as the data controller due to its processing of your personal data. According to Article 10 of the Law, titled "Obligation to Inform", data controllers are required to inform individuals whose personal data they process about certain matters.

This notice has been prepared by **SIDE PREMIUM** to ensure compliance with the legislation and to maintain transparency and accountability.

#### **Definitions**

According to the Personal Data Protection Law No. 6698:

**Personal Data** refers to any information relating to an identified or identifiable natural person.

**Sensitive Personal Data** includes information regarding an individual's race, ethnic origin, political opinion, philosophical beliefs, religion, sect or other beliefs, clothing, membership in associations, foundations, or trade unions, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.

**Processing of Personal Data** refers to any operation performed on personal data, whether wholly or partially automated or processed by non-automated means that are part of a data recording system. These operations include collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or prevention of use.

**Data Subject** refers to the natural person whose personal data is processed.

**Data Controller** refers to the natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.

**Obligation to Inform** refers to the obligation of the data controller or its authorized representative to provide information to data subjects at the time of collecting personal data regarding the identity of the data controller, the purposes of processing personal data, the parties to whom the processed personal data may be transferred and the purposes of such transfers, the method and legal basis for collecting personal data, and other rights specified in Article 11 of the Law.

**Data Subject and Data Controller** As our guest staying at our hotels, you are classified as a data subject under the law, as we process certain personal data related to you.

**Data Controller:** [SiDE PREMIUM] is the data controller responsible for determining the purposes and means of processing your personal data and for establishing and managing the data recording system.

#### Your Processed Personal Data, Processing Purposes, and Legal Grounds

#### If You Fill Out the Accommodation Form

The following personal data will be processed;

- Identity Information (Name, Surname, Nationality, Date of Birth, Turkish ID Number (TCKN)), Contact Information (Address, Phone Number), Legal Transaction
   Information (Signature, Signature Date, Departure Date), Customer Transaction
   Information (Room Number, Check-in Date, Check-out Date, Folio Number, Agency)
  - o For Managing Customer Relations Processes
    - KVKK Article 5/2(c): Processing is necessary for the performance or execution of a contract to which the data subject is a party. (In order to provide you with accommodation services, we must obtain certain personal data in the accommodation form.)
  - For Conducting Storage and Archiving Activities
    - KVKK Article 5/2(f): Processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. (We retain accommodation form data for a reasonable period to monitor our services retrospectively.)

#### To Whom and for What Purpose Your Personal Data May Be Transferred

Your personal data may be transferred to the relevant authorities without the obligation to inform you and without requiring your explicit consent, if requested under Article 28/1 of the KVKK.

Apart from this, in unforeseen circumstances, if explicitly required by law, your personal data may be transferred to public institutions specified in the legislation (such as ministries and other administrative authorities) within the scope of the purposes and limitations stipulated by law.

Except for legal obligations that do not require an obligation to inform and explicit consent, your personal data is not shared with third parties.

#### **Methods of Collecting Personal Data**

Your personal data is collected through non-automated means when you fill out the accommodation form.

Processing of Personal Data Related to Food Allergies During Your Stay In order to ensure that you do not experience any issues related to your food allergies during your stay, we process certain personal data. In this process, the following personal data may be collected:

• Identity Information (Name, Surname), Health Information (Food Allergy Details), Customer Transaction Information (Room Number)

 Processing Purposes and Legal Grounds For Managing Product/Service Production and Operational Processes & Conducting Business Activities and Audits

For Information Other Than Health Data:

 KVKK Article 5/2(c): Processing is necessary for the performance or execution of a contract to which the data subject is a party. (In order to provide you with a seamless accommodation experience, we collect certain personal data in the food allergy form.)

#### For Health Information:

- KVKK Article 6/3(d): Processing is necessary for the establishment, exercise, or protection of a right. (In order to ensure your safety and prevent any health-related issues during your stay, we collect this personal data.)
- For Conducting Storage and Archiving Activities For Information Other Than Health Data;
  - KVKK Article 5/2(e): Processing is necessary for the establishment, exercise, or protection of a right. (We retain this personal data to protect our rights in case of potential disputes.)
- For Health Information:
  - KVKK Article 6/3(d): Processing is necessary for the establishment, exercise, or protection of a right. (We store this personal data to ensure your safety and provide you with a smooth accommodation experience.)

#### To Whom and for What Purpose Your Personal Data May Be Transferred

Your personal data may be transferred to the relevant authorities without the obligation to inform you and without requiring your explicit consent, if requested under Article 28/1 of the KVKK.

Apart from this, in unforeseen circumstances, if explicitly required by law, your personal data may be transferred to public institutions specified in the legislation (such as ministries and other administrative authorities) within the scope of the purposes and limitations stipulated by law.

Except for legal obligations that do not require an obligation to inform and explicit consent, your personal data is not shared with third parties.

## **Methods of Collecting Personal Data**

Your personal data is collected through non-automated means when our staff fills out the guest information card.

# In the Process of Issuing an Invoice in Your Name via the Accounting Software We Use;

The following personal data will be processed:

- Identity Information (Name, Surname), Legal Transaction Information (Invoice Date, Invoice Time, Invoice Type, Invoice Number), Financial Information (Service Fee Details), Customer Transaction Information (Service Provided) Processing Purposes and Legal Grounds
  - o For Conducting Financial and Accounting Operations
    - KVKK Article 5/2 (ç): Processing is necessary for the data controller to fulfill its legal obligations. (According to Article 230 of the Tax Procedure Law No. 213, obtaining the mentioned data is a legal obligation for the data controller.)
  - For Conducting Storage and Archiving Activities
    - KVKK Article 5/2 (ç) Processing is necessary for the data controller to fulfill its legal obligations. (According to Article 82 of the Turkish Commercial Code No. 6102, obtaining the mentioned data is a legal obligation for the data controller.)
  - For Conducting Financial and Accounting Operations
    - KVKK Article 5/2(f): Processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. (As the data controller, we have a legitimate interest in transferring the data to the accounting software to manage financial and accounting operations.)

For Transaction Security (Date and Time of Your Transaction) KVKK Article 5/2(e): Processing is necessary for the establishment, exercise, or protection of a right. (In order to protect our rights in case of potential disputes, we must create and store your personal data for the security of your transaction.)

# To Whom and for What Purpose Your Personal Data May Be Transferred

Your personal data may be transferred to the relevant authorities without the obligation to inform you and without requiring your explicit consent, if requested under Article 28/1 of the KVKK.

Apart from this, in unforeseen circumstances, if explicitly required by law, your personal data may be transferred to public institutions specified in the legislation (such as ministries and other administrative authorities) within the scope of the purposes and limitations stipulated by law.

Except for legal obligations that do not require an obligation to inform and explicit consent, your personal data may be transferred to the accounting software for conducting financial and accounting operations, in accordance with the conditions specified in Article 8 of the Law.

#### **Methods of Collecting Personal Data**

Your personal data is collected using semi-automated methods through the accounting software.

# When You Enter Our Hotel Campus with Your Vehicle The following personal data will be processed:

- Identity Information (Name, Surname), Contact Information (Phone), Legal
  Transaction Information, (Vehicle Plate, Entry Date, Date) Processing Purposes and
  Legal Grounds
  - For Ensuring Physical Security and Conducting Storage and Archiving Activities
    - KVKK Article 5/2(f): Processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. (We have a legitimate interest as the data controller in creating the Vehicle Registration Form for ensuring physical security and storing it for storage and archiving purposes.)

# To Whom and for What Purpose Your Personal Data May Be Transferred

Your personal data may be transferred to the relevant authorities without the obligation to inform you and without requiring your explicit consent, if requested under Article 28/1 of the KVKK.

Apart from this, in unforeseen circumstances, if explicitly required by law, your personal data may be transferred to public institutions specified in the legislation (such as ministries and other administrative authorities) within the scope of the purposes and limitations stipulated by law.

Except for legal obligations that do not require an obligation to inform and explicit consent, your personal data will not be transferred to third parties.

#### **Methods of Collecting Personal Data**

Your personal data is collected by our staff using non-automated methods on paper.

# During the Registration Process, When Your Passport Information is Recorded via the Hotel Management Program The following personal data will be processed:

- Identity Information (Name, Surname, Nationality, Passport Number, Identity Type)
  - Processing Purposes and Legal Grounds For Conducting Goods/Services Sales Processes, Storage and Archiving Activities, and Business Operations/Control
    - KVKK Article 5/2(f): Processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. (As the data controller, we have a legitimate interest in transferring this data to the hotel management program to manage the sale of goods/services, store and archive the data, and monitor business operations.)

Transaction Security (Date and Time of Transaction) Your personal data, such as the date and time of the transaction, is processed for information security purposes in accordance with Article 5/2(e) of the KVKK. This article states that processing is necessary for the

establishment, exercise, or protection of a legal right. In case of any dispute, we need to create and store your personal data to protect our legal rights.

# Who Personal Data May Be Transferred to and for What Purposes

Your personal data may be transferred to the relevant authorities without the obligation of disclosure and without requiring your explicit consent, as per Article 28/1 of the Personal Data Protection Law (KVKK), if requested.

In unforeseen situations, your personal data may also be transferred to public institutions (such as ministries or administrative authorities) in cases where explicitly stated in the laws, and within the purposes and limitations prescribed by the law.

Apart from the legal obligations where there is no obligation to inform and no need for explicit consent, your personal data may be transferred to the hotel management program for business activities and auditing purposes, in accordance with the conditions set out in Article 8 of the Law.

### **Methods of Collecting Personal Data**

Your personal data is created through semi-automatic methods using the hotel management program from which services are obtained.

# In the Process of Recording Your Reservation Information Through the Hotel Management Program Your personal data processed includes:

- Identity (Name, Surname), Finance (Contract Price), Legal Transaction (Sale Date),
   Customer Transaction (Agency Name, Check-in Date, Check-out Date, Room Type,
   Number of Rooms, etc.) Purpose of Processing Personal Data.
  - Conducting Goods/Service Sales Processes, Storing and Archiving Activities, and Conducting/Monitoring Business Activities
    - KVKK Article 5/2(f): In accordance with this article, data processing is required for the legitimate interests of the data controller, provided it does not harm the fundamental rights and freedoms of the relevant person. (This involves collecting personal data for conducting service sales, archiving, and transferring it to the hotel management program for business process control.)

Transaction Security (Date and Time of the Transaction) KVKK Article 5/2(e): Data processing is necessary for the establishment, exercise, or protection of a legal right. (For the protection of our rights in case of a dispute, we must create and store your personal data.)

### Who Personal Data May Be Transferred to and for What Purposes

Your personal data may be transferred to the relevant authorities without the obligation of disclosure and without requiring your explicit consent, as per Article 28/1 of the Personal Data Protection Law (KVKK), if requested.

In unforeseen situations, your personal data may also be transferred to public institutions (such as ministries or administrative authorities) in cases where explicitly stated in the laws, and within the purposes and limitations prescribed by the law.

Apart from the legal obligations where there is no obligation to inform and no need for explicit consent, your personal data may be transferred to the hotel management program for business activities and auditing purposes, in accordance with the conditions set out in Article 8 of the Law.

### **Methods of Collecting Personal Data**

Your personal data is obtained automatically through the reservation page of the service provider.

# When You Make a Reservation on Our Website ozhotels.com The personal data processed includes;

- Identity (Name, Surname), Contact (Email, Phone), Finance (Card Number, CVV),
   Customer Transaction (Check-in Date, Check-out Date, Number of Adults, Number of Children) Purpose of Processing Personal Data.
  - Conducting Goods/Service Sales Processes
    - KVKK Article 5/2(c): Data processing is required for the formation or performance of a contract. (This data is collected in order to establish the online reservation contract.)
  - Storing and Archiving Activities
    - KVKK Article 5/2(e): Data processing is necessary for the establishment, exercise, or protection of a legal right. (Your personal data is stored to protect our rights in case of any dispute.)
  - Transaction Security (Date and Time of the Transaction)
    - KVKK Article 5/2(e): Data processing is necessary for the establishment, exercise, or protection of a legal right. (We need to create and store your personal data for the protection of our rights in case of a dispute.)

#### Who Personal Data May Be Transferred to and for What Purposes

Your personal data may be transferred to the relevant authorities without the obligation of disclosure and without requiring your explicit consent, in accordance with Article 28/1 of the Personal Data Protection Law (KVKK), if requested.

In unforeseen situations, your personal data may also be transferred to public institutions (such as ministries or administrative authorities) in cases where explicitly stated in the laws, and within the purposes and limitations prescribed by the law.

Apart from the legal obligations where there is no obligation to inform and no need for explicit consent, your personal data will not be transferred.

## **Methods of Collecting Personal Data**

Your personal data is collected automatically through the relevant form on the reservation page of our website.

Transfer of Your Identity Information to the Gendarmerie General Command In this process:

- Identity (Name, Surname, TCKN) data is transferred.
  - Purpose of the Data Transfer Informing Authorized Persons, Institutions, and Organizations
    - KVKK Article 5/2(a): As per the law, data transfer is required where explicitly foreseen. (According to Article 3 of the Law No. 1774 on Identity Notification, your identity information must be transferred to the authorized persons, institutions, and organizations for information sharing purposes.)

#### Who Personal Data May Be Transferred to and for What Purposes

Your personal data may be transferred to the relevant authorities without the obligation of disclosure and without requiring your explicit consent, in accordance with Article 28/1 of the Personal Data Protection Law (KVKK), if requested.

In unforeseen situations, your personal data may also be transferred to public institutions (such as ministries or administrative authorities) in cases where explicitly stated in the laws, and within the purposes and limitations prescribed by the law.

Apart from the legal obligations where there is no obligation to inform and no need for explicit consent, your personal data may be transferred to the Gendarmerie General Command and to authorized persons, institutions, and organizations for information sharing purposes in accordance with Article 8 of the law.

### **Your Rights Regarding Personal Data**

Data subjects are required to initially submit their rights concerning personal data to the data controller.

According to the law, regarding your personal data, you have the right to:

- a) Learn whether your personal data is being processed,
- b) Request information regarding the processing of your personal data,
- c) Learn the purpose of processing your personal data and whether it is used in accordance with its purpose.
- ç) Be informed about third parties to whom your personal data is transferred, both domestically and abroad,
- d) Request the correction of your personal data if it is incomplete or incorrect,
- e) Request the deletion or destruction of your personal data if the reasons for processing it no longer exist,
- f) Request that the actions taken under paragraphs (d) and (e) be notified to third parties to whom your personal data has been transferred,
- g) Object to the result arising from the exclusively automated processing of your personal data, which results in an unfavorable outcome,
- ğ) Request compensation for damages in case you suffer any loss due to unlawful processing of your personal data.

#### **Method of Application to the Data Controller**

You can submit your application:

- In writing to the address Evrenseki Mahallesi Sahil Caddesi 20.Sokak No:6 MANAVGAT/ANTALYA;
- By sending a secure electronic signature or mobile signature to the KEP address ozinsaatturizm@hs01.kep.tr;
- If your email address is registered in our system, you can send an email using the same address to sidepremium@ozhotels.com.tr .

Your application must include:

- •Your first name, last name, and, if the application is in writing, your signature,
- For Turkish citizens, your Turkish ID number; if you are a foreigner, your nationality, passport number, or, if available, your ID number,
  - Your residential or business address for notifications,
  - If available, your electronic mail address for notifications, phone, and fax numbers,
  - The subject of your request,

and any related information and documents concerning the subject of your request must also be attached to the application.

**SIDE PREMIUM** reserves the right to verify your identity.

For the procedures and rules to follow during the application, and more detailed information, you can refer to the Personal Data Protection Authority's "Communiqué on Procedures and Principles for Applications to the Data Controller."