

LUJOHOTEL'S POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

1. PURPOSE

The purpose of this policy is to establish the strategies, in-house controls and measures, operational rules and responsibilities related to the protection of the fundamental rights and freedoms and in particular the privacy of individuals, to ensuring compliance with the obligations within the framework of processing personal data and to processing and protecting personal data by Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim Şirketi (the Company) in compliance with the Constitution of the Turkish Republic as well as the Turkish Personal Data Protection Law no. 6698; and to raise the awareness of personal data subjects and the company's employees in respect thereof.

2. SCOPE

The provisions hereunder will be applicable for real persons having personal data processed by the Company fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means. The data subject group is described in article 5.4 hereof.

3. RESPONSIBILITIES

This Policy has come into force upon the approval of the Board of Directors of the Company. Any and all activities to be implemented and measures to be taken by the Company within the framework of the Policy will be established by relevant procedures. The preparation, updating and implementation of said procedures will be the responsibility of the Senior Management of the Company.

All company personnel will be liable to fulfill their duties in compliance with this Policy and all relevant procedures and legislation.

4. DEFINITIONS

Significant definitions used hereunder are listed below.

Explicit Consent	A freely-given, specific and informed consent
Anonymization	Rendering personal data impossible to link with an identified or identifiable natural person, even by matching them with other data,
Data Subject	The natural person, whose personal data is processed
Related User	Persons who process personal data within the data collector's

	organization or in line with the authority and instructions received from the data controller, excluding persons or units who are responsible for the technical storage, protection, and backing up of data
Destruction	Deletion, elimination or anonymization of personal data
Law	Law on Personal Data Protection No 6698
Recording media	Any medium containing personal data processed automatically, completely or in part, or non-automatically, provided it is a part of a data recording system
Personal data	All information related to a real person whose identity is known or could be identified
Processing of personal data	Any kind of transaction performed on the data such as obtaining, saving, storing, protecting, modifying, editing, describing, transferring, receiving, making available, classifying or blocking the use of the data fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.
Deleting personal data	To delete personal data or to render data no longer accessible or reusable for related users
Destroying personal data	To render personal data inaccessible, unrecoverable and not reusable by anyone
Anonymizing personal data	Rendering personal data impossible to link with an identified or identifiable natural person, even by matching them with other data
Board	Personal Data Protection Board
Authority	Personal Data Protection Authority
Special categories of personal data	Biometric and genetic information concerning race; ethnicity; political opinions; philosophical opinions; religion, sect or other beliefs; appearance; subscriptions to associations, foundations

	or syndicates; health; sex life; convictions; and data concerning security measures
Periodic destruction	The processes of erasing, destroying or anonymizing personal data to be performed directly in recurring intervals set out in the policy when all the conditions for processing personal data stipulated under the law cease to exist
Registry	Data controllers registry retained by the Presidency of the Personal Data Protection Authority
Data processor	The natural person or legal entity who process personal data on behalf of the Data Controller and with the authority granted by the Data Controller
Data registry system	The registry system which the personal data is registered into through being structured according to certain criteria
Data controller	The natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system

5. PROCESSING OF PERSONAL DATA

5.1. GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

The Company processes personal data in compliance with the principles and rules anticipated in the Law and other legislation and conforms to the following principles for the processing of personal data:

a) Compliance with Law and Honesty Rule

While processing personal data within the framework of this policy, the Company acts in compliance with relevant legislation, secondary regulations and the generally accepted maxims of law. The following will be applicable as a minimum for all kinds of data processing activities to be undertaken by the company;

- Personal data protection should be based on valid grounds (such as explicit consent),
- Personal data should not be used to the detriment of the individuals concerned without a valid reason,
- The transparency principle should be adopted for the processing of personal data and related persons should be kept informed within this framework,
- Personal data should be processed to the minimum possible extent and in line with the reasonable expectations and predictions of individuals.

b) Ensuring the accuracy and, where necessary, up-to-date nature of personal data

Within the framework of this principle, the Company will;

- Carry out checks to ensure that the personal data are accurate,
- Ensure that the sources from where the personal data are obtained are established and tested for accuracy,
- Carefully consider any claims arising out of the inaccuracy of personal data,
- Assess whether personal data requires to be updated,
- Take the required technical and administrative measures to ensure that the channels ensuring that the personal data are accurate and up-to-date are kept open.

c) Being processed for specific, explicit and legitimate purposes

The Company will ensure that the personal data processing activities are clearly understandable by the data subject and that the data are processed within the framework of clear and lawful purposes defined before the start of personal data processing operations.

d) Being relevant with, limited to and proportionate to the purposes for which they are processed

The Company will process personal data only in relation to achieving pre-specified goals and restrict personal data processing to data required to achieve the said goals. Any personal data obtained will not be illegally disclosed to third parties and used for purposes other than processing.

e) Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed

The Company will retain the personal data only for the period set forth in the relevant regulations, or for such period of time as is necessary for the purpose for which the data are processed. In cases when the reasons for the processing are cease to exist, the personal data will be deleted, destroyed or anonymized by the company either ex officio or upon the request of the data subject.

The principles applicable to the storage periods and retaining of personal data are set out in the **Personal Data Storage and Disposal Policy**.

5.2. CONDITIONS FOR PROCESSING OF PERSONAL DATA

Personal data will be processed by the company in compliance with the processing guidelines set out in Article 5 of the Law. Within this framework, any and all personal data processing activities will be implemented upon the fulfillment of the following personal data processing conditions:

a) Availability of the explicit consent of the personal data subject

The Company will determine whether the purpose for personal data processing is based on any of the processing conditions other than explicit consent and, if at least one of the conditions other than explicit consent set out in the Law is not fulfilled, the person's explicit consent will be sought for the continuation of the data processing activity. Within this framework, if the data subject consents freely, without leaving any room for doubt and

regarding only the related process to having his/her data processed after being clearly informed through **Clarification text on the Protection and Processing of Personal Data** to be provided by SERKOÇ OTELCİLİK and by signing the **Explicit Consent Statement for the Processing of Personal Data**, then the Company will process the related personal data.

b) Being clearly provided for by the laws

In cases when the legislation contains a provision about the right to process personal data, the Company will process personal data subject to applicable restrictions by the relevant legal regulations.

c) Being mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid

In cases when the personal data subject is incapable to express his/her consent or his/her consent is not deemed legally valid, the Company will be entitled to process data if it is mandatory for the protection of life or physical integrity of the person or of any other person.

d) Processing of personal data belonging to the parties of a contract being necessary provided that it is directly related to the conclusion or fulfillment of that contract.

In cases when the processing of personal data belonging to the parties of a contract is necessary provided that it is directly related to the conclusion or fulfillment of that contract, the Company will be entitled to process the data of related persons provided that it is restricted to the said purpose.

e) Being mandatory for the Company to be able to perform its legal obligations

In cases when data must be processed to fulfill legal obligations, the Company will be entitled to process the data of related persons.

f) Data concerned having made available to the public by the data subject

Any personal data that are made available to the public by the data subject, in other words, made public by any means will be processed by the Company that it is restricted to the said purpose.

g) Data processing being mandatory for the establishment, exercise or protection of any right

In cases when data processing is mandatory for the establishment, exercise or protection of any right, the Company will be entitled to carry out personal data processing activities in line with the said requirement.

h) Being mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Personal data may be processed in cases when it is mandatory for the legitimate interests of the Company, provided that this processing is not violating the fundamental rights and freedoms of the data subject. A reasonable balance should be established between the benefit to be obtained by the Company as a result of data processing and the fundamental rights and freedoms of the data subject.

Processing rights without explicit consent and examples are listed below:

Processing Conditions	Scope	Example
Regulatory Provision	Tax legislation, Labor Law, Turkish Commercial Law etc.	Retaining of the employees' personal information in compliance with relevant legislation.
Execution of the agreement	Employment Contracts, Sales Contracts, etc.	Processing of personal data of employees for the purpose of preparing payrolls.
Physical incapability	Persons who are not capable of giving consent or to distinguish due to physical incapability.	Personal medical data of unconscious persons. Location data of kidnapped or missing persons.
Legal Obligations of the Data Controller	Financial Inspections, Security Legislation, Compliance with Regulations	Processing of data such as bank account number, marital status, dependants, whether the employee's spouse works or not, and social insurance number, for the purpose of paying salaries to the employee.
Making public	Personal information made public by the data subject.	Contact details clearly announced to the public in order to allow communication under certain conditions.
Establishing, Protecting and Exercising a Right	Data that must be used during transactions such as filing a lawsuit, registration procedures, all kinds of title deed transactions etc.	Retaining of required information about an employee who left the job during the period of limitation.
Legitimate interest	Processing of data in cases when it is mandatory for the legitimate interests of the data controller provided that the fundamental rights of the data subject are protected	Processing of data for the purpose of giving rewards and bonuses that increase employee engagement.

5.3. CONDITIONS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

While processing special categories of personal data, the Company will first establish whether the data processing conditions are fulfilled or not, and proceed with data processing only after making sure that regulatory compliance condition is duly fulfilled. Within this framework and provided that the required measures set out by the Board are taken, the following special categories of personal data may be processed;

a) Special categories of personal data excluding those relating to health and sexual life,

- may be processed upon obtaining the data subject’s explicit content
- or in cases anticipated in relevant legislation.

b) Personal data relating to health and sexual life,

- may be processed upon obtaining the data subject’s explicit content.
- Personal data relating to health and sexual life may only be processed, without seeking explicit consent of the data subject, by any person or authorized public institutions and organizations that have a confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and care services, planning and management of health-care services as well as their financing.

Processing rights for special categories of personal data without explicit consent and examples are listed below:

Processing Conditions	Scope	Example
Regulatory Provision	Personal data, <u>excluding those relating to health and sexual life</u> , may be processed without seeking explicit consent of the data subject. Any stricter data processing conditions stipulated in Tax legislation, Labor Law, Turkish Commercial Law etc.	Union commitment data of the employees should be retained in the employee’s personal file according to relevant legislation.
Protection of public health, operation of preventive medicine, medical diagnosis, treatment and care services, planning, management and financing of health-care	Processing of data by any person or authorized public institutions and organizations that have a confidentiality obligation for the purposes of the protection of public health, operation of preventive medicine, medical diagnosis, treatment and care services, planning, management and financing of health-care	Medical data processed by physicians about their patients.

services	services	
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Measures taken for the processing of special categories of personal data are set out in the **"Policy on the Protection and Processing of Special Categories of Personal Data"**.

5.4. DATA SUBJECT GROUPS AND CATEGORIES OF PROCESSED PERSONAL DATA

The data subject groups having their personal data processed by our Company are as follows:

Data Subject Group	
Employee Candidates and Apprentice Candidates	Natural persons who have applied for a job in the Company, or those who have rendered their CVs and relevant details accessible to the Company in any way
Employees	Company employees
Apprentices	High school and university students serving their apprenticeship in the Company
Family Members	Family members of data subjects
Visitors	Natural persons who have entered in the company's physical premises for any purpose whatsoever, or those who have visited its websites
Business Partners' Officials and Employees	Natural person officials, shareholders and employees of institutions with which the company is in a commercial relationship
Affiliates' Officials and Employees	Natural persons whose personal data are obtained through the business relations of the Affiliates within the framework of the operations carried out by the Company
Suppliers' Officials and Employees	Natural person officials, shareholders and employees of natural or legal persons to which the Company has outsourced the supply of goods and services
Shareholders	Natural persons who are shareholders
Company Officials	Members of the board of directors of the Company and other authorized natural persons
Potential Customers	Natural persons who may potentially purchase/use the goods and services provided by our Company/Affiliates

Customers/Guests	Natural persons who have purchased/used the goods and services provided by the Company/Affiliates, irrespective of whether there is any contractual relationship or not with the Company/Affiliates
Third Persons	Third-party natural persons who have relationships with the abovementioned parties to ensure the security of commercial transactions between our Company and these parties and protect rights of the said persons and derive benefits (e.g. Persons declared as references) or other natural persons not covered by the Policy on the Protection and Processing of Personal Data

The processed data of the above-listed data subjects are categorized as follows:

Identity Information	T.R. Identity No, Passport No, Birth Certificate Serial No, Driving License No, Tax ID, Name-Surname, Father's Name, Mother's Name, Citizenship, Place of Birth, Date of Birth, Age, Place of Registry (City, District, Quarter-Village, Volume No, Family Order No, Order No), Place of Issuance of the Birth Certificate, Reason for Issuance, Registration No, Date of Issue, Date of Expiry, Former Surname, Marital Status, Gender, Religion, Photo, Sample Signature, Military Service Status, Letter of Parental Consent
Educational & Experience Information	Educational status, certificates and diplomas, foreign languages, CV and references, work experience, courses, seminars, internship, other educations and skills.
Contact Details	Personal/Business mobile-landline phone number; Personal/Business e-mail address; residence address; name and surname and phone number of the contact person to be contacted in emergencies
Special categories of personal data	Criminal records, disability status, religion, medical data, blood type
Family Information	Identifying information of mother, father, spouse and children; telephone number, profession, educational status of children; employment status and income of the spouse; name-last name and age of dependents except for the spouse and minor children (under 18, years of age); birth certificate of children; death certificate of first-degree family members.
Employment Information	SSI Registration no; insurance start/retirement, allocation no; social security no; tax office and identification number; previous employer registration details, previous salary and tax deduction; work permit (for foreign employees); promotion status; employment contract;

	confidentiality commitments; general health insurance information; job offer information; position name/job, department and unit, title; last date of employment; start and end date of employment; overtime details; fixtures and equipment delivery documents; partnership/additional job declaration forms, etc.
Leave Information	Leave request forms, leave start and end dates, number of leave days, reason for leave, address/telephone at which the employee will be present or which the employee will use during the leave; rest and incapacity reports; annual paid leave schedules; reports/warnings for absence without permission/tardiness
Performance Data	Performance assessment and target achievement status, activity information, records of disciplinary actions
Educational & Developmental Information	Training/seminars attended, skills acquired, training attendance information/forms
Financial Information	Bank account number, book; payrolls, payslips, documents relating to payments such as salaries, bonuses, etc.; file and debt information relating to enforcement proceedings; minimum subsistence allowance; private health insurance; personal data processed in relation to information, documents and records showing any financial results created based on the type of legal relationship established with the data subject.
Vehicle Data	Vehicle/vehicle use information (License plate no, vehicle license serial no, start date of employment, start date of insurance-motor insurance, traffic fines, accident reports, occupational accident notifications, certificates of vehicle custodianship)
Location Information	Vehicle location data - GPS location
Leave of Employment Information	Resignation Letter, Termination Notice, Certificate of Release, Mutual Rescission Agreement, SSI Leave of Employment Declaration, Payroll for the Last Month, Employment/Service Certificate, Severance and Notice Pay Payrolls, Documents proving the rightful reason for termination, Reports of Termination of Employment Contract
Internet Access Information	Log records of internet access via Company networks with personal/Company electronic devices, related IP addresses
System Access Authorization	System input-output and activity logs, user name-password, IP addresses

Information	
Audiovisual Information	Photographs and camera recordings (except for records within the scope of Physical Security Information)
Physical Security Information	Images recorded during entry to and stay in the physical space, turnstile records, security records etc.
Visit Information	Times of entry into and exit from the company facilities, vehicle brand and license plate, company information
Marketing Information	Reports and assessments obtained as a result of satisfaction surveys, campaigns, direct marketing efforts etc. showing the usage habits, likes and needs of customers who are personal data subjects
Customer/Guest Information	Information such as records about the use of products and services and instructions required for the use of products and services by customers, claims etc.; occupation, countries visited; training; height-weight
Travel & Accommodation Information	Travel and visa information, reservation/voucher number, flight information, hotel information, check-in and check-out dates, room number
Claim and Complaint Handling Information	Customer satisfaction surveys, personal data about the handling and assessment of claims and complaints regarding the products and services

5.5. REASONS FOR PROCESSING PERSONAL DATA

Personal data collected by the Company will be processed for the following purposes in compliance with the processing conditions set out in Articles 5 and 6 of the Law:

Main Reasons	Secondary reasons
Management of the Company, Implementation and Inspection of the Activities, Provision of Physical, Legal and Commercial Security	Preparing and Implementing Emergency and Crisis Management Plans
	Managing Financing and Accounting Processes
	Ensuring Physical Security
	Managing Relations and Related Processes with Affiliates, Business Partners and Suppliers
	Conducting Legal Processes
	Implementing Internal Audit and Internal Control Activities
	Managing the Business Continuity

	Ensuring the Registration and Documentation Order
	Planning and Implementing Corporate Management Activities
	Conducting Risk Management Processes
	Conducting Contract Processes
	Conducting Strategic Planning Activities
	Managing Process Management and Improvement Activities
	Ensuring that Company Activities are Conducted in accordance with Company Policies and Procedures and/or Related Legislation
	Ensuring the legal and commercial security of the company, its personnel and any persons having a business relation with the company
	Ensuring the Security of Company's Assets
	Fulfilling our legal obligations in compliance with applicable legislation and exercising our rights arising out of the prevailing legislation
	Conducting Supply Chain Management Processes
	Conducting Investment Processes
	Informing Authorized Persons, Institutions and Organizations
	Creating and Tracking Visitor Records
Managing the Human Resources Processes	Carrying out the application processes for job candidates
	Carrying out the selection and assessment processes for job candidates
	Implementing activities to ensure employee satisfaction and loyalty
	Managing the processes relating to benefits and interests of employees
	Monitoring and supervising the work activities of personnel
	Carrying out occupational health and safety processes
	Establishing and implementing labor contracts, fulfilling contractual liabilities
	Implementing recruitment, personnel affairs and exit processes
	Executing career planning, promoting-reassignment processes
	Executing performance management processes
	Carrying out Personnel Assignment and Authorization Processes
	Planning and Implementing Training and Orientation Programs
	Wages Policy Management
Work and Residence Permit Procedures for Foreign Employees	
Information Systems	Planning and Executing Information Security Processes

and Information Security Management	Information Systems Risk Management
	Fulfilling legal obligations for monitoring the internet traffic
	Managing User Access and Authorization Processes
	Creating Log Records
Planning and Implementing Communication and Marketing Activities	Planning and implementing events and organizations
	Conducting Engagement Processes for the Company/Products/Services
	Implementing Communication Activities
	Carrying out Statistical Analyses and Market Research
	Campaigns, Promotions, Advertisements, etc. Conducting Activities
	Customer Relations Management
	Customer Satisfaction Management
	Planning and Managing Marketing Activities
	Implementing Sponsorship Activities
Planning and Offering Products and Services	Conducting Logistics Activities
	Providing Support Services After Sales of Goods/Services
	Implementing Operational Processes
	Contacting Customers about the Products and Services Offered
	Fulfilling Product/Service Conditions and Obligations
	Establishing and Managing Processes for Planning and Sales of Products/Services
	Claim and Complaint Handling

In the following cases when the personal data processing conditions set out in Article 5(2) and 6(3) of the Law are not fulfilled, the personal data may only be processed after obtaining the explicit consent of the data subject:

Personal Data Processed	Reason for Processing
Medical and Blood Type Information and Disability Status	Compliance with occupational health and safety regulations, examination at recruitment and periodic examinations and checks under the supervision of the workplace doctor, medical report, e-prescription, management of health screening processes and corporate health insurance processes

Information about Religion <i>(to be obtained by requesting a photocopy of the former form of birth certificate)</i> and Nationality	Managing human resources processes; creating personal files under the Labor Law; conducting visa procedures limited to certain tours for guests
Visual and Audio Data <i>(Photos and camera recordings)</i>	Planning and implementing corporate communication activities, managing corporate social media accounts
Birthday Information	Celebrating birthdays of employees within the framework of internal communication activities

5.6. DELETION, ELIMINATION OR ANONYMIZATION OF PERSONAL DATA

Despite being processed under the provisions of this Law and other related laws, personal data shall be erased, destroyed or anonymized by the Company, ex officio or upon demand by the data subject, upon disappearance of reasons which require the process.

Accordingly, in cases when;

- The provisions of relevant regulations forming the basis for personal data processing are altered or revoked,
- The agreement between the parties has never been executed, is not valid, has automatically expired, terminated or canceled,
- The reason for processing personal data ceases to exist,
- It is established that processing personal data contravenes the law or the principle of integrity,
- The data subject withdraws his/her consent in cases when personal data processing is only possible by obtaining an explicit consent,
- The request filed by the related person as regards to personal data processing within the framework of sub-paragraphs (e) and (f) of the first paragraph of article 11 of the Law is accepted by the Company,
- The related person files a complaint with the Board and the Board finds this complaint acceptable in cases when the Company rejects an application filed by the related person to have personal data deleted or destroyed, the answer is found to be unacceptable or no answer is provided within the legally stipulated period of time,
- No conditions requiring to have the personal data stored for a longer time are existent although the maximum period of time applicable to the storage of personal data has elapsed,
- The conditions for the processing of personal data as set out in article 5 and 6 of the Law cease to exist,

then the personal data must be deleted, eliminated or anonymized.

The principles applicable to deleting, elimination or anonymization of personal data are set out in the **"Personal Data Storage and Disposal Policy"**.

5.7. TRANSFERRING PERSONAL DATA

The personal data transfer conditions set out in articles 8 and 9 of the Law will be applicable for any personal data transfers to be carried out by the Company.

The parties to whom personal data may be transferred by the company and the purposes for the said transfer are listed below:

Parties to whom Personal Data may be Transferred	Reasons for Transfer
Officially Authorized Institutions	Fulfilling the information-documentation requirement of authorized public institutions and organizations and private legal persons within the framework of their legal authorities.
Shareholders	Implementing the corporate law, commercial activities, event management and corporate communication processes
Company Officials	Designing, implementing and managing strategies related to the Company's commercial activities; carrying out the monitoring, risk management and inspection activities.
Business Partners	Fulfilling the establishment goals and carrying out the business activities of the business partnership
Affiliates	Carrying out processes and commercial activities requiring the involvement of affiliates.
Suppliers	Managing processes on outsourced goods and services, receiving support, inspection and consultancy services, allowing the personnel to make use of side benefits
Third Persons	Information sharing within the scope of reference verification/inquiry procedures for employee candidates and employees leaving the job.

5.7.1. TRANSFERRING PERSONAL DATA IN TURKEY

The Company will be entitled to transfer personal data in the following cases:

- The explicit consent of the related person is obtained,
- Being clearly provided for by the laws
- Being mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid
- Processing of personal data belonging to the parties of a contract being necessary provided that it is directly related to the conclusion or fulfillment of that contract.
- Being mandatory for the Company to be able to perform its legal obligations
- Data concerned having made available to the public by the data subject
- Data processing being mandatory for the establishment, exercise or protection of any right

- Being mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Special categories of personal data may be transferred by taking the necessary measures as set out by the Board and in the following cases:

- The explicit consent of the related person is obtained,
- The transfer is clearly anticipated in related legislation applicable for special categories of personal data excluding those relating to health and sexual life,
- Personal data relating to health and sexual life may only be processed, without seeking explicit consent of the data subject, by any person or authorized public institutions and organizations that have a confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and care services, planning and management of health-care services as well as their financing.

Measures taken for the processing of special categories of personal data are set out in the **"Policy on the Protection and Processing of Special Categories of Personal Data"**.

5.7.2. TRANSFERRING PERSONAL DATA ABROAD

The Company will be entitled to transfer personal data abroad in the following cases:

- The explicit consent of the related person is obtained,
- One of the conditions set forth in articles 5(2) and 6(3) of the Law exist and sufficient protection is provided in the foreign country where the data is to be transferred,
- The controllers in Turkey and in the related foreign country guarantee a sufficient protection in writing and the Board has authorized such transfer, where sufficient protection is not provided.

In cases where interests of Turkey or the data subject will seriously be harmed, personal data, without prejudice to the provisions of international agreements, may only be transferred abroad upon the permission to be given by the Board after receiving the opinions of related public institutions and organizations

Measures taken for transferring special categories of personal data abroad are set out in the **"Policy on the Protection and Processing of Special Categories of Personal Data"**.

5.7.3. TRANSFERRING DATA PROCESSED BY AFFILIATES TO THE COMPANY

In order to make sure that the activities of the Affiliates are performed in compliance with the principles, targets and strategies of the Company and to protect the group's rights and benefits, any personal data processed by the Affiliates may also be processed by the Company. In cases when the personal data sharing by and between the Affiliates and the Company is performed within the framework of personal data transfer from one data controller to another, the related Affiliate will inform the related person about the possibility of sending their data to the Company while collecting the personal data.

6. MATTERS CONCERNING DATA SECURITY

The Company will be obliged to take all necessary technical and administrative measures to provide a sufficient level of security in order to prevent unlawful processing of personal data, prevent unlawful access to personal

data, ensure the retention of personal data; conduct necessary inspections with the aim of implementing the provisions of the Law.

6.1 ADMINISTRATIVE MEASURES

- a) The probability of realization of risks that may likely arise in terms of the protection of personal data and losses to incur in case of such realization will be determined and measures will be taken to minimize or eliminate said risks.
- b) The duties, authorities and responsibilities of personnel involved in processes concerning all policies and procedures on the processing as well as ensuring the privacy and protection of personal data will be put in writing and made available to the entire personnel.
- c) Required training on processing the personal data and data privacy will be provided to the personnel.
- d) The policies and procedures will be kept updated, the personnel will be provided training and kept informed on any changes.
- e) During the recruitment process, provisions concerning the protection and privacy of personal data will be included in any agreements to be executed by and between the Company and the employees and signed by the employee.
- f) It will be established whether processed personal data are still required and whether these data are kept correctly and measures will be taken to ensure that personal data kept in the archives are stored in more secure locations, any personal data that are no longer required are deleted, eliminated or anonymized in compliance with the **Personal Data Storage and Disposal Policy**.
- g) In-house access to any retained data will be restricted to personnel who should have access in line with their job descriptions.
- h) In cases when the personnel violate any policies and procedures established and announced by the company, the sanctions set out in the **Disciplinary Procedure** will be applicable.
- i) Confidentiality agreements concerning the protection of personal data and data privacy will be executed with persons with whom the personal data are shared and data processors or provisions about data privacy will be included in existing agreements.
- j) Regular checks will be implemented, the required actions will be planned and carried out for areas of potential improvement within the framework of policies and procedures.
- k) Actions will be planned for carrying out inspections in order to fulfill regulatory obligations and to establish any deficiencies in data privacy and security, and the resulting findings will be promptly rectified.
- l) In cases when the processed personal data are captured by third parties by illegal means, the related party and the Board will be informed about this state of affairs as soon as possible.

6.2 TECHNICAL MEASURES

- a) SSL connections, anti-virus and firewall software and hardware will be employed to protect information technology system containing personal data and the data.
- b) Any obsolete hardware and services will be deleted.

- c) Regular checks will be conducted to ensure that the software and hardware are in good working order and that the security measures are adequate; the required patching activities and software updates will be carried out in order to close security gaps.
- d) Access to systems containing personal data will be allowed within the framework of access policies, user and role management procedures. The extent and terms of authorities of users allowed access to the data will be clearly defined. The access rights to personal data of Information Technologies personnel will be kept under control.
- e) If remote access to the data is required, a two-factor authentication system will be employed as a minimum.
- f) Authority checks will be performed on a regular basis.
- g) The authorities of any personnel who have their position changed or who leave their jobs will be promptly revoked. Within this framework, any inventories assigned to the said personnel will be recovered.
- h) Measures will be taken to ensure that the technical substructure preventing or detecting any data leakages outside the company is available.
- i) Log records of all users will be kept on a regular basis.
- j) System vulnerabilities will be checked by receiving leak test services on a regular basis and when required.
- k) Any media and equipment where the personal data are stored will be protected by physical safety measures.
- l) All data will be backed up and all backups will be physically secured in order to ensure secure storage of personal data.
- m) Measures will be taken to ensure that personal data are destroyed in an irrevocable manner and without leaving any audit trails.
- n) According to article 12 of the Law, all digital media where personal data are stored will be protected by encrypted or cryptographic means fulfilling information security requirements. Cryptographic keys will be kept in safe and varied locations.
- o) During the storage and use of personal data retained in the cloud medium, measures will be taken that data are encrypted by cryptographic means and, if possible for personal data, separate encryption keys are used for each cloud solution employed and the entire copies of the encryption keys needed to activate personal data are destroyed at the termination of the cloud informatics service relation.
- p) If personal data are to be transferred by e-mail, measures will be taken that the data are transferred cryptically via a corporate e-mail address or a Registered Electronic Mail (REM) account.
- q) In cases when personal data are to be transferred via flash memory, CD, DVD etc., data will be encrypted by cryptographic means and the cryptographic keys will be kept in a different location.
- r) While transferring data to and from servers in different physical environments, data will be transferred by installing VPN between the servers or by using the sFTP method.
- s) While transferring data by using hard copies, such documents will be protected against risks such as theft, loss or being seen by unauthorized persons.

7. CLARIFICATION

Any processed personal data will not be illegally disclosed to third parties and used for purposes other than processing. The information that must be provided to data subjects within the framework of “**Clarification Text for the Protection and Processing of Personal Data**” are as follows:

- a) Company data,
- b) The purpose of data processing,
- c) To whom and for what purposes the processed data may be transferred,
- d) The method and legal reason of collection of personal data,
- e) The rights of the related person within the framework of the Law.

The text of the “**Clarification Text for the Protection and Processing of Personal Data**” will be made available on the Company’s web site.

If personal data cannot be obtained directly from the data subject due to bodily incapability or inability to access the data subject, the obligation to clarify towards the data subject is fulfilled:

- within a reasonable period of time from obtaining of personal data,
- at the time of the first communication with the data subject if the personal data are to be used for communication with the data subject,
- at the latest when the personal data are first transferred if the personal data are to be transferred.

In case that the personal data having made available to the public by the data subject are processed, no clarification is required.

8. RIGHTS OF THE DATA SUBJECT

Each data subject has the right to apply to our Company and;

- a) learn whether his personal data are processed or not,
- b) request information if his personal data are processed,
- c) learn the purpose of his data processing and whether this data is used for intended purposes,
- ç) know the third parties to whom his personal data is transferred at home or abroad,
- d) request the rectification of the incomplete or inaccurate data, if any,
- e) request the erasure or destruction of his personal data,
- f) request notification of the operations carried out in accordance with sub-paragraphs (d) and (e) to third parties to whom his personal data has been transferred,
- g) object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavorable consequence for the data subject,
- ğ) request compensation for the damage arising from the unlawful processing of his personal data.

The company has established the required mechanism and communication channels for the management, fulfillment and recording of applications filed by personal data subjects.

Data subject will be entitled to file claims by filling in the “Data Subject Application Form” available at www.lujohotel.com and by sending it to the Company by using the below-listed methods or any other methods set out by the Board and accompanied by proof of identity information and documentation.

- After the Data Subject Application Form is duly filled, the original signed document should be sent either in person or via a notary public to "Meşelik Mah. Çomça Mevkii Sok. No: 10 Milas/MUĞLA".
- After the Data Subject Application Form is duly filled in and signed with the "secure electronic signature" as stipulated in the Electronic Signature Law no. 5070, the form with the secure electronic signature should be sent by registered electronic mail to serkocotelcilik@hs03.kep.tr.

The company will conclude the demands involved in the applications within the shortest time possible depending on the nature of the demand and within thirty days at the latest and free of charge. However if the action in question incurs another cost, the price set by the Board may be collected.

The Company will accept the application or decline it on justified grounds and communicate its response to data subject in writing or in electronic media. If the demand involved in the application found admissible, the required actions will be taken by the Company. The data subject shall be reimbursed for the application fee provided that the application has been lodged due to a mistake made by the Company.

If the application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may file a complaint with the Board within thirty days from when he learns about the response of the Company, or within sixty days as of the application date, in any case

8.1 CASES NOT COVERED BY THE RIGHTS OF DATA SUBJECTS

In the following cases when the regulatory provisions are not applicable, the data subjects will not be entitled to exercise their rights.

- The personal data are processed for art, history, literature or scientific reasons or in the scope of freedom of expression, provided this does not constitute a crime, violate the national defense, national security, public safety, public order, financial security, privacy of personal life or personal rights.
- Personal data is anonymized through official statistics and processed for research, planning and statistics
- Personal data are processed within the scope of preventive, protective or intelligence activities performed by public bodies and institutions given the task and authority by law to ensure national defense, national security, public safety, public order or economic security.
- The personal data are processed by judicial or executive authorities in relation with investigations, prosecutions, adjudications or law enforcement.

With the exclusion of the right to demand clarification and claim damages pertinent and proportional to the purpose and fundamental principles of the Law, the data subjects will not be entitled to exercise their rights in the following cases:

- The processing of the personal data is required to prevent crimes or for criminal investigation.
- The data processed is already made public by the data subject;
- Personal data processing is necessary to carry out inspection or regulation, or disciplinary investigation or prosecution activities by official and authorized institutions and entities and occupational organizations which have the nature of public institutions, as per the authorization granted by law.
- Processing personal data is necessary to protect the economic and financial interests of the state concerning budget, tax and financial issues.

