

INFORMATION NOTICE ON EMPLOYEE VISUAL AND AUDIO DATA PROCESSING ACTIVITIES

1. Purpose and scope

This Information Notice on Visual and Audio Data Processing Activities ("Information Notice") has been prepared to inform the relevant persons, pursuant to the Personal Data Protection Law No. 6698 ("KVKK"), about the photographs, video and audio recordings processed within the scope of promotion, corporate communications, social-media sharing and internal communication (such as Microsoft Teams) processes carried out at the hotels operating under TUI Hotels & Resorts Türkiye. For employees, this Information Notice covers the taking, recording, editing, sharing, archiving and, where necessary, removal of visual/audio content and is intended solely to provide information. Your explicit consent may additionally be requested for certain processing activities involving your visual/audio data, in particular public sharing through social media or advertising.

For the purposes of this Information Notice, the data controller shall be referred to as THR TÜRKİYE*.

(* THR TÜRKİYE represents the legal entities Iberotel International A.Ş., Turcotel Turizm A.Ş. Club Seno, Turkuaz İnşaat Turizm A.Ş., Kybele Turizm Yatırım San. ve Tic. A.Ş. and TT HOTELS TURKEY OTEL HİZ. TUR. VE TİC. A.Ş., which are under the corporate umbrella of TUI A.G. Each group company is deemed to be the sole data controller for the processing, storage, transfer and sharing of data.)

2. Personal data processed

Your personal data that may be processed within the scope of this activity are as follows:

- Visual data: Photo, video recording, your image.
- Audio data: Audio recording (including speech/tone of voice).
- Identity/contact information (limited): Name-surname (especially for the purpose of content labeling, internal communication announcements or management of consent records for employees), department/title (for employees).
- Transaction security records: Log/transaction records (if necessary), such as on what date the content was created, with what equipment, to which account it was published, by whom it was processed.

In some cases, visual content may also reflect a person's distinctive physical characteristics.

3. Purposes of processing personal data

Your visual and audio data may be processed for the following purposes:

- 1) Corporate communication and promotion: Creating hotel/brand awareness, promotional and informational content.
- 2) Social media management: Sharing on social media accounts of THR TURKEY and/or hotels (e.g. Instagram, YouTube, etc.).
- 3) Internal communication: Information, training, meetings, event sharing, internal announcements on Microsoft Teams and similar corporate internal communication platforms.
- 4) Event and organization management: Animation/entertainment activities, announcement and reporting of events.
- 5) Legal processes and compliance: Management of relevant person requests, proof in case of possible disputes, execution of audit processes.

4. Method of collection of personal data and legal reason

Your personal data;

- Camera/phone etc. that takes photos/videos. with equipment,
- During the meeting/event via internal communication platforms (Teams etc.),
- Within the scope of social media content production processes,
- Via consent/permission registration forms and tracking lists

It can be collected physically and/or electronically. The legal grounds may vary depending on the nature of the processing activity:

- KVKK art.5/1 – Explicit consent: Especially in cases such as social media, advertising and public promotional posts.
- KVKK art.5/2-f – Legitimate interest: In limited cases (e.g. running the organization in corporate internal communication; security of the content production process; logging), provided that it does not harm the fundamental rights and freedoms of the person concerned and by observing the principle of proportionality.

In activities requiring explicit consent, disclosure and explicit consent procedures are carried out separately.

5. Parties to which personal data may be transferred and purposes of transfer

Your visual/audio data, limited to the above purposes:

- To group companies within THR TÜRKİYE (internal communication, corporate communication coordination),
- To service providers/suppliers (agency, production, design, social media management, IT/cloud services, etc.),
- To social media platforms (in case of sharing),
- To authorized public institutions and organizations if legally requested

transferable. Your personal data may be transferred abroad due to infrastructures such as social media platforms and/or Microsoft Teams. Transfer abroad is made within the framework of KVKK's international transfer provisions (KVKK art. 9) and in line with your express consent.

6. Storage periods

Your visual and audio data;

- As long as the publication/communication purpose of the content continues,
- Limited to the required periods within the scope of the relevant person request (removal/objection) and legal evaluation processes,
- For the maximum periods specified in THR TURKEY's Personal Data Retention and Destruction Policy and our VERBİS records.

is stored; At the end of the period, it is deleted, destroyed or made anonymous.

7. Your rights under KVKK (KVKK art.11)

Within the scope of KVKK art.11; You have the right to learn whether your personal data is being processed, to learn its purposes, to know the third parties to whom it is transferred, to request correction/deletion/destruction, to object and to request compensation for your losses. Additionally, if you are not a citizen of the Republic of Türkiye, you reserve the right to lodge a complaint with the Supervisory Authority in your own country.

To exercise your rights:

- Hotel General Directorate
- In writing: Güzeloba Mah. Havaalanı Cad. No:64/Z1-Z2 Muratpaşa / Antalya
- Email: dpo@tuihotels.com.tr

You can apply through:

8. Security measures

Camera recording activities carried out to ensure physical space security; It is limited to the general lobby, exterior, parking lot, and corridors. No visual or audio recording is made in guest rooms, toilets, showers, SPA closed rooms and massage rooms.

For the protection of audio/visual data; Technical and administrative measures such as authorization matrix, access restriction, device security, password management, logging, data security provisions in supplier contracts, employee training and periodic audits are applied.

9. Updates

This Information Text can be updated if necessary. The current text is made available to relevant people through appropriate methods.