

HOTEL – INFORMATION NOTICE ON THE PROCESSING OF SPECIAL-CATEGORY HEALTH DATA OF GUESTS WITH DISABILITIES FOR EMERGENCY MANAGEMENT PURPOSES

1. Purpose and Scope

This Information Notice on the Processing of Special-Category Health Data of Guests with Disabilities for Emergency Management Purposes (the "Information Notice") has been prepared pursuant to Personal Data Protection Law No. 6698 (the "KVKK") to inform data subjects about the processing of information concerning the disability status of guests with disabilities who stay at the hotel or use the services offered by the hotel, and their special needs related to that status, for the purposes of ensuring their safety in emergencies, conducting evacuation and rescue processes in accordance with their individual needs, providing the necessary support and guidance in a timely manner and facilitating an appropriate response in possible emergencies.

With respect to information provided directly by guests staying at the hotel or using hotel services, or provided at the guest's express request by their authorised legal representative, accompanying person or support person, this Information Notice covers data-processing activities carried out within the scope of:

- emergency planning and the preparation of individual support plans,
- safely guiding the guest in the event of fire, earthquake, flood, evacuation, medical emergency, security incident or a similar situation,
- taking into account the guest's needs for mobility, visual, hearing, speech, cognitive or communication support,
- communicating, where necessary, with the guest, their accompanying person and authorised emergency-response units,
- identifying the guest's location and the support they require in an emergency,
- reviewing processes following a possible incident and fulfilling internal-audit and legal obligations.

These are the data-processing activities covered by this Information Notice.

Important: This Information Notice is provided solely for information purposes. As disability status and related health information constitute special-category personal data, your explicit consent is requested separately where the processing of such data must be based on explicit consent. The Explicit Consent Declaration is presented separately from this text.

Refusal to give explicit consent, or subsequent withdrawal of consent, does not in itself remove the guest's right to stay at the hotel or use the hotel's general services. However, if the necessary personal support information is not provided, the hotel may be unable to plan fully and accurately the support and evacuation arrangements specific to the guest in an emergency.

If, in an urgent and life-threatening situation, the guest is physically or legally incapable of expressing consent and processing is necessary to protect the life or physical integrity of the guest, the required information may, to the extent permitted by applicable legislation, be processed or shared with authorised persons and organisations without separately seeking explicit consent.

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, retention, transfer and sharing of data.)

2. Personal Data Processed

Within the scope of this activity, the following personal data may be processed, provided that they are necessary for emergency management and comply with the principle of proportionality:

- Guest identification information: Full name and the limited registration information required to associate the guest with their stay or reservation.
- Guest health information constituting special-category personal data:
 - General information provided by the guest concerning their disability or health condition,
 - Limited mobility or need for walking assistance,
 - Use of a wheelchair, powered wheelchair, walker, cane or similar assistive device,
 - Need for visual or hearing support,
 - Need for speech, communication or guidance support,
 - Need for cognitive or perceptual support,
 - Type of personal assistance required during emergency evacuation,
 - Special requirements relating to stairs, lifts, doors, alarms, announcements or similar emergency features,
 - Personal instructions provided by the guest that must be followed in an emergency,
 - Information on the accompanying person or support person to be contacted in an emergency, to the extent necessary for the guest's safety.

The hotel does not request health reports, diagnoses, treatment histories, disability percentages, medication lists or detailed medical histories that are unnecessary for emergency management. However, if the guest voluntarily shares such information, only the part genuinely required for emergency management will be processed; unnecessary details will not be used.

- Limited contact details of an accompanying person or support person: Full name, telephone number and/or email address.
- Processing records: The date on which the information was obtained, the member of staff by whom it was processed, whether the emergency-support information was updated, and records of explicit consent or withdrawal.

3. Purposes of Processing Personal Data

The guest's disability and health data may be processed solely for the following purposes:

- 1) Protecting the guest's life and physical integrity: Ensuring the guest's safety in emergencies and providing the necessary support without delay.
- 2) Individual emergency planning: Planning evacuation and guidance processes by taking into account the guest's mobility, communication, visual, hearing or other support needs.
- 3) Conducting evacuation and rescue processes: Transferring the guest to a safe area in the event of fire, earthquake, flood, security incident, medical emergency or a similar situation.
- 4) Ensuring emergency communication: Communicating, where necessary, with the guest, accompanying person, support person, authorised healthcare units, fire brigade, law-enforcement units or other authorised public institutions and organisations.
- 5) Conducting accessibility and reasonable-support processes: Ensuring, to the extent possible, that the guest can access emergency warnings, guidance and support services within the hotel.
- 6) Internal audit and compliance: Auditing emergency procedures, guest-safety processes and data-security practices.
- 7) Evidence in possible disputes: Recording, solely to the extent necessary, the emergency procedures performed and the needs reported by the guest.

The data are not used for any practice that differentiates against, excludes or deprives the guest of services because of their disability. Data processing is carried out solely for the stated purposes and in a manner that is relevant, limited and proportionate to those purposes.

4. Method of Collection and Legal Grounds for Processing Personal Data

Your personal data may be collected:

- through forms and declarations completed by you during reservation or hotel check-in procedures,

- through the Hotel General Management, reception, guest relations or authorised personnel during your stay,
- through email, telephone or similar written and verbal communication channels,
- through an emergency-support form or an individual evacuation plan,
- where necessary, through information provided by an accompanying person or legal representative,
- through the hotel's physical and/or electronic record systems.

Your personal data may be collected by these methods.

For the processing of disability status and related health data on the basis of explicit consent, the legal ground is the data subject's explicit consent pursuant to KVKK Art. 6/3(a).

If, in an emergency, the guest is physically or legally incapable of expressing consent and processing is necessary to protect the life or physical integrity of the guest or another person, the relevant data may be processed pursuant to Art. 6 of the KVKK to the extent permitted by that legal circumstance.

With respect to data that are not special-category data, such as the guest's full name, room or reservation information and the contact details of the person to be contacted in an emergency, the legal grounds set out in the relevant provisions of the KVKK may be relied upon depending on the nature of the processing activity.

For activities requiring explicit consent, the information and explicit-consent procedures are conducted separately. Provision of information does not, by itself, mean that explicit consent has been given. Refusal to give explicit consent does not prevent the guest from using general hotel services; however, it may affect the scope of personalised emergency support.

5. Parties to Whom Personal Data May Be Transferred and Purposes of Transfer

The guest's disability and health data may be transferred to the following parties solely for the purposes stated above and only to the extent necessary:

- hotel personnel responsible for emergency management,
- only personnel with a need to know among reception, security, technical service, housekeeping or emergency teams,
- the limited number of hotel employees assigned to evacuate the guest or ensure the guest's safety,
- the accompanying person or support person expressly designated by the guest,
- authorised healthcare units, ambulance teams, the fire brigade, law-enforcement units and other authorised public institutions and organisations in possible emergencies,
- authorised persons and organisations where required under a legal obligation or because of a vital risk.

The data may be transferred to these parties.

The minimum possible amount of data is used during transfer. For example, instead of the guest's detailed health history, summary information required for the emergency, such as "requires accompanying assistance during evacuation", "requires hearing assistance" or "uses a wheelchair", may be shared with personnel or the emergency team.

The transfer abroad of your data processed within this scope is not envisaged. However, if the information systems or technical infrastructures used are connected with systems abroad, your personal data may be transferred abroad.

International transfers will be carried out in accordance with the KVKK provisions governing transfers abroad and by implementing the required appropriate safeguards.

6. Retention Periods

The guest's disability and health data are retained:

- for the duration of the guest's stay or use of hotel services,

- for as long as the guest's need for emergency support continues,
- if the guest withdraws explicit consent or the data are updated, until the necessary deletion, destruction or anonymisation procedures are completed for previous records that are not legally required to be retained,
- for the period required to resolve a possible dispute, conduct an examination or audit, or fulfil legal obligations,
- for the maximum periods specified in THR TÜRKiYE's Personal Data Retention and Destruction Policy.

The data are retained for these periods; upon expiry of the retention period or cessation of the purpose of processing, they are deleted, destroyed or anonymised.

If the information concerning the guest's emergency-support needs is no longer current, up-to-date information is obtained from the guest and information that is no longer necessary is removed from the systems and physical records.

7. Your Rights Under the KVKK

Under Art. 11 of the KVKK, you have the right to:

- learn whether your personal data are being processed,
- request information if your personal data have been processed,
- learn the purpose of processing your personal data and whether they are used in accordance with that purpose,
- know the third parties to whom your personal data are transferred in Türkiye or abroad,
- request the rectification of your personal data if they have been processed incompletely or inaccurately,
- request the deletion or destruction of your personal data under the conditions stipulated in the KVKK,
- request notification of the rectification, deletion or destruction operations to third parties to whom your personal data have been transferred,
- object to any result arising to your detriment through the analysis of processed data exclusively by automated systems,
- claim compensation for damage incurred as a result of the unlawful processing of your personal data.

These are your statutory rights.

To exercise your rights, you may apply through the following channels:

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

You may submit your application through these channels.

8. Security Measures

Technical and administrative measures are implemented to protect special-category personal data, including access authorisation, the need-to-know principle, physical file security, encryption and access control, logging of processing records and access activities, personnel confidentiality undertakings and training, informing emergency teams about data security, and including data-security provisions in supplier agreements.

Health data in emergency plans are limited to the minimum information necessary for the guest's safety. Detailed health reports or unnecessary medical information concerning the guest are not included in the emergency plan. Physical records are kept in a manner that prevents access by unauthorised persons; electronic records may be accessed only as required by a person's duties and authority.

9. Updates

This Information Notice may be updated when necessary. The current text will be made accessible to data subjects by appropriate means.

Last Updated: 18.08.2026