

PERSONAL DATA PROCESSING AND PROTECTION POLICY

1. Purpose

This policy has been prepared in order to comply with all applicable data protection legislation, especially the Personal Data Protection Law No. 6698 (KVKK), in the activities carried out by the data controller TT HOTELS TURKEY OTEL HİZ. TUR. VE TİC. A.Ş. ("TT HOTELS"), and to determine the basic principles, methods and practices regarding the processing and protection of personal data. It also defines the general framework of the disclosure obligation that must be fulfilled in accordance with Article 10 of the Law.

2. Scope

The policy covers all personal data processing activities carried out within TT HOTELS. Personal data belonging to employees, employee candidates, suppliers, guests, visitors and other third parties are evaluated within this scope, including data processed in any electronic or physical environment.

Personal data categories, processing purposes, legal reasons and transfer details according to relevant person groups; It is stated in detail in the clarification texts prepared by TT HOTELS and in the Personal Data Processing Inventory contained in VERBİS records.

3. Definitions

Recipient Group: The category of natural or legal person to whom personal data is transferred by the data controller.

Explicit Consent: Consent regarding a specific issue, based on information and expressed with free will.

Anonymization: Making personal data impossible to associate with an identified or identifiable natural person in any way, even by matching it with other data.

Employee: TT HOTELS Staff

Employee Candidate: Real person who applies to work in our company.

EBYS: Electronic Document Management System

Electronic Environment: Environments where personal data can be created, read, changed and written with electronic devices.

Non-Electronic Media: All written, printed, visual, etc. other than electronic media. other environments.

Service Provider: Natural or legal person who provides services within the framework of a specific contract between TT HOTELS and KVKK.

Relevant Person: Natural person whose personal data is processed.

Relevant User: Persons who process personal data within the data controller organization or in line with the authorization and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection and backup of the data.

Destruction: Deletion, destruction or anonymization of personal data.

Law: Personal Data Protection Law No. 6698.

Recording Environment: Any environment where personal data is processed by fully or partially automatic or non-automatic means, provided that it is part of any data recording system.

Personal Data: Any information regarding an identified or identifiable natural person.

Personal Data Processing Inventory: Personal data processing activities carried out by data controllers depending on their business processes; The inventory they create by associating the personal data with the purposes and legal reason for processing personal data, the data category, the transferred recipient group and the data subject person group, and detailing the maximum retention period required for the purposes for which personal data are processed, the personal data envisaged to be transferred to foreign countries and the measures taken regarding data security.

Processing of Personal Data: All kinds of operations performed on data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic or non-automatic means provided that it is part of any data recording system.

Board: Personal Data Protection Board

KVKK: Personal data protection authority

Guest: Real person staying in our hotel

Special Personal Data: Data regarding people's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data.

Periodic Destruction: The process of deleting, destroying or anonymizing personal data, which is specified in the personal data storage and destruction policy and will be carried out ex officio at recurring intervals, in case all the conditions for processing personal data specified in the law are eliminated.

Policy: Personal Data Storage and Destruction Policy

Supplier Employee: Company official/employee within the scope of a certain product or service contract.

Data Processor: Real or legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller.

Data Recording System: A recording system in which personal data is structured and processed according to certain criteria.

Data Controller: 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.

Data Controllers Registry Information System: The information system created and managed by the Presidency, accessible over the internet, that data controllers will use in applying to the Registry and other related transactions related to the Registry.

VERBİS: Data Controllers Registry Information System

Regulation: Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28 October 2017.

4. Authority and Responsibilities

ROLE	JOB DESCRIPTION
Data Controller Contact Person	Within the scope of TT HOTELS, both within the scope of EU GDPR and KVKK, harmonizing the operation of the entire group with the legislation, preparing general policies, inspecting the processes, planning and preparation of trainings, examining and finalizing the applications and complaints to be made in accordance with the legislation, ensuring communication and coordination with the TUI Center and other companies of TUI, by TUI Center. Fulfilling the assigned duties is the main duty of this commission. It also performs the duties of registering to VERBİS, notifying and responding to correspondence with the KVK Authority on behalf of the Data Controller.
KVKK Commission	Local data protection compliance subject matter expert • To take into account the obligations of businesses and relevant employees under applicable data protection laws, including the EU General Data Protection Regulation. • Monitor, evaluate, analyze and verify compliance with applicable data protection laws, including regulatory and internal data protection policies. • Supporting the investigation and handling of data protection complaints and data security incidents. • Propose and monitor the performance of data protection impact assessments • To develop, deliver and monitor employee training and awareness. • Maintain and comply with applicable recordkeeping requirements. • Act as a point of contact and cooperate with the local supervisory authority. • Cooperating with the TUI Group Data Protection and Privacy Network.
Data Security Commission	Identifying IT and Physical Infrastructure gaps and informing the management how and at what costs these gaps and deficiencies can be closed, taking the necessary actions with the approval of the management, carrying out the necessary controls and inspections both on the basis of the facility and the Head Office.

Facility DPO	As TT HOTELS, ensuring that all decisions and implementation instructions taken within the scope of KVKK/GDPR are implemented and supervised in the facility in charge, and supporting the process by participating in the training given by the facility KVKK/GDPR trainer, To identify the problems and needs in the facilities and to report them to both the KVKK commission and the Data Security Commission, and to fulfill other duties assigned by the KVKK/GDPR Commission.
Hotel KVKK Training Officer	To make plans for the delivery of KVKK awareness training to all personnel, to provide training and or to ensure that the training is carried out.

5. Basic Principles

TT HOTELS carries out its personal data processing activities in accordance with the following principles:

- Compliance with law and honesty rules
- Accuracy and timeliness
- Specific, clear and legitimate purposes
- Purpose-related, limited and measured processing
- Stored for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed.

6. Purposes of Processing Personal Data

TT HOTELS processes personal data for the following purposes:

Data Category	Purpose of Personal Data Processing
1-ID	-Execution of Emergency Management Processes -Conducting Employee Candidate / Intern / Student Selection and Placement Processes -Execution of Employee Satisfaction and Loyalty Processes - Fulfillment of Employment Contract and Legislation Obligations for Employees -Conducting Educational Activities -Conducting Activities in Compliance with Legislation -Execution of Commitment Processes to the Company / Product / Services -Ensuring Physical Space Security -Following and Execution of Legal Affairs -Performing Communication Activities -Execution/Audit of Business Activities -Performing Occupational Health / Safety Activities -Execution of Logistics Activities -Execution of Goods / Service Purchasing Processes -Execution of Goods / Service Sales Processes -Conducting Performance Evaluation Processes -Execution of Contract Processes -Following of Requests / Complaints -Foreign Personnel Work and Residence Permit Procedures -Conducting Talent / Career Development Activities -Providing Information to Authorized Persons, Institutions and Organizations -Creation and Tracking of Visitor Records

2-Contact	-Execution of Emergency Management Processes -Conducting Employee Candidate / Intern / Student Selection and Placement Processes - Fulfillment of Employment Contract and Legislation Obligations for Employees -Conducting Activities in Compliance with Legislation -Execution of Commitment Processes to the Company / Product / Services -Ensuring Physical Space Security -Following and Execution of Legal Affairs -Performing Communication Activities -Execution of Logistics Activities -Execution of Goods / Service Purchasing Processes -Following of Requests / Complaints -Foreign Personnel Work and Residence Permit Procedures -Providing Information to Authorized Persons, Institutions and Organizations -Creation and Tracking of Visitor Records
4-Essentials	- Fulfillment of Employment Contract and Legislation Obligations for Employees -Conducting Educational Activities -Conducting Performance Evaluation Processes -Conducting Talent / Career Development Activities -Providing Information to Authorized Persons, Institutions and Organizations
5-Legal Action	-Following and Execution of Legal Affairs
6-Customer Transaction	-Execution of Emergency Management Processes -Conducting Activities in Compliance with Legislation -Ensuring Physical Space Security -Following and Execution of Legal Affairs -Performing Communication Activities -Execution/Audit of Business Activities -Performing Occupational Health / Safety Activities -Execution of Goods / Service Purchasing Processes -Execution of Goods / Service Sales Processes -Following of Requests / Complaints -Providing Information to Authorized Persons, Institutions and Organizations -Performing Management Activities -Creation and Tracking of Visitor Records
7-Physical Space Security	-Ensuring Physical Space Security -Providing Information to Authorized Persons, Institutions and Organizations -Creation and Tracking of Visitor Records
8-Transaction Security	-Execution of Information Security Processes -Providing Information to Authorized Persons, Institutions and Organizations
10-Finance	-Conducting Employee Candidate / Intern / Student Selection and Placement Processes - Fulfillment of Employment Contract and Legislation Obligations for Employees -Following and Execution of Legal Affairs -Foreign Personnel Work and Residence Permit Procedures -Providing Information to Authorized Persons, Institutions and Organizations
11-Professional Experience	-Execution of Emergency Management Processes -Conducting Employee Candidate / Intern / Student Selection and Placement Processes - Fulfillment of Employment Contract and Legislation Obligations for Employees -Conducting Educational Activities -Conducting Activities in Compliance with Legislation -Ensuring Physical Space Security -Performing Communication Activities -Performing Occupational Health / Safety Activities -Execution of Goods / Service Purchasing Processes -Conducting Performance Evaluation Processes

	-Execution of Contract Processes -Foreign Personnel Work and Residence Permit Procedures -Conducting Talent / Career Development Activities -Providing Information to Authorized Persons, Institutions and Organizations
13-Visual and Audio Records	-Conducting Employee Candidate / Intern / Student Selection and Placement Processes -Performing Communication Activities -Foreign Personnel Work and Residence Permit Procedures -Providing Information to Authorized Persons, Institutions and Organizations
16-Philosophical Beliefs, Religion, Sects and Beliefs	- Fulfillment of Employment Contract and Legislation Obligations for Employees
21-Health Information	-Execution of Emergency Management Processes -Conducting Employee Candidate / Intern / Student Selection and Placement Processes - Fulfillment of Employment Contract and Legislation Obligations for Employees -Performing Occupational Health / Safety Activities -Providing Information to Authorized Persons, Institutions and Organizations -Other (Protection of Public Health)
23-Criminal Conviction and Security Measures	-Conducting Employee Candidate / Intern / Student Selection and Placement Processes -Ensuring Physical Space Security -Conducting Performance Evaluation Processes -Providing Information to Authorized Persons, Institutions and Organizations
24-Biometric Data	-Ensuring Physical Space Security
26-Other Information - Body Information	-Other (Supply of clothing to staff)

These purposes are also detailed in our personal data storage and destruction policy and in the disclosure texts of the relevant persons.

7. Personal Data Collection Methods and Legal Reasons

Personal data can be collected through automatic or non-automatic means, written, verbal and electronic means, provided that it is part of any data recording system; It is collected for legal reasons such as explicit consent, performance of the contract, fulfillment of legal obligations, foreseen by law, data processing is mandatory for the establishment, use or protection of a right, legitimate interests of the data controller and protection of public health, provided that it does not harm the fundamental rights and freedoms of the person concerned.

8. Domestic and International Data Transfer

Personal data may be transferred to domestic and foreign business partners, affiliates, public institutions or authorized organizations in accordance with the conditions stipulated by the Law. International transfers are carried out especially in processes related to TUI AG and group companies in Germany. Data hosted in cloud systems such as Microsoft 365 are transferred abroad in accordance with security measures. The "Regulation on Data Transfer Abroad" dated July 10, 2024 is taken as basis.

9. Conditions for Processing of Special Personal Data

In KVKK, the Data Controller is more responsible for the protection of personal data determined as "personal data of special nature".

He acts sensitively and carefully. Special categories of personal data are not processed by the Institution and its affiliated companies without the explicit consent of the data owner. The Data Controller processes the criminal record-related data and health reports of its employees and employee candidates, in order to be included in the personnel file of their disability status or to make assignments in accordance with their health status when making an assignment, by taking adequate measures in accordance with the relevant legislation and to be determined by the legislation. In addition, all other policies and information texts published by the data controller include information texts regarding special data processing activities and, when necessary, explicit consent forms.

10. Measures Implemented to Protect Personal Data

Technical and Administrative Measures

The following technical and administrative measures are taken to ensure the security of personal data:

Key management is implemented.

Network security and application security are ensured.

A closed system network is used for personal data transfer via the network.

Security measures are taken within the scope of supply, development and maintenance of information technology systems.

The security of personal data stored in the cloud is ensured.

Access logs are kept regularly.

Corporate policies on access, information security, use, storage and destruction have been prepared and implemented.

Confidentiality commitments are made.

The authorities of employees who change their duties or leave their jobs in this area are removed.

Up-to-date anti-virus systems are used.

Firewalls are used.

Personal data security policies and procedures have been determined.

Personal data security issues are reported quickly.

Personal data security is monitored.

Necessary security measures are taken regarding entry and exit to physical environments containing personal data.

The security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.

The security of environments containing personal data is ensured.

Personal data is reduced as much as possible.

Personal data is backed up and the security of the backed up personal data is ensured.

User account management and authorization control system is implemented and these are also monitored.

Periodic and/or random audits are carried out within the institution.

Log records are kept without user intervention.

Current risks and threats have been identified.

Cyber security measures have been taken and their implementation is constantly monitored.

Penetration testing is applied.

Data processing service providers are periodically audited regarding data security.

Data processing service providers are made aware of data security.

There are disciplinary regulations for employees that include data security provisions.

Training and awareness activities are carried out at regular intervals for employees regarding data security.

An authority matrix has been created for employees.

Protocols and procedures for the security of special personal data have been determined and implemented.

If sensitive personal data is to be sent via e-mail, it must be sent encrypted using a corporate mail account.

The signed contracts contain data security provisions.

Encryption is done.

11. Data Breach Management

- When a violation is detected, the KVK Authority is notified within 72 hours.
- Relevant persons are informed.
- Root cause analysis is performed and measures are taken to prevent recurrence.

12. Storage and Destruction of Personal Data

The data is stored for the period stipulated in the legislation. At the end of the period, it is deleted, destroyed or anonymized in accordance with the "Personal Data Storage and Destruction Policy".

13. Rights of the Relevant Person

In accordance with Article 11 of KVKK, data subjects have the following rights:

- Learning whether personal data is processed or not
- If it has been processed, request information about it
- Request correction, deletion, destruction

- Learning about transferred third parties
- Object to processing being analyzed exclusively by automated systems
- Claim compensation in case of damage.

14. Management and Update of Policy

The policy is approved by TT HOTELS management. It is updated when necessary, in parallel with legislative changes or developments in the activities of the institution. Updates are announced to employees and stakeholders.

15. Communication

Questions and requests regarding personal data processing activities can be directed to the Data Controller Contact Person: dpo@tuihotels.com.tr

However, it is important for the relevant persons to first carefully read the information texts prepared for them and examine the purposes, methods, storage periods and application steps specified therein. Acting in accordance with the instructions in the relevant information text before applying will ensure the smooth functioning of the processes.

TT HOTELS TURKEY OTEL HİZ. TUR. VE TİC. A.Ş.