

INFORMATION NOTICE ON GUEST 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 and social-media sharing processes carried out at the hotels operating under TUI Hotels & Resorts Türkiye.

For guests, this Information Notice covers the taking, recording, editing, sharing, archiving and, where necessary, removal of visual/audio content.

This Information Notice 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).
- 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 belonging to THR TÜRKİYE and/or hotels (e.g. Instagram, YouTube, etc.).
- 3) Event and organization management: Animation/entertainment activities, announcement and reporting of events.
- 4) 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 grounds

Your personal data;

- By means of equipment such as cameras and telephones used to take photographs/videos,
- Within the scope of social-media content production processes,
- Through consent/permission record forms and tracking lists,

your personal data may be collected in physical and/or electronic environments. The legal grounds may vary according to the nature of the processing activity:

- KVKK Art. 5/1 – Explicit consent: Particularly in cases such as social-media, advertising and public promotional sharing.
- KVKK Art. 5/2(f) – Legitimate interest: In limited cases (e.g. security of the content-production process; logging), provided that the fundamental rights and freedoms of the data subject are not prejudiced and the principle of proportionality is observed.

In activities requiring explicit consent, the information notice 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 TÜRKiYE (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

may be transferred. Your personal data may be transferred abroad due to infrastructures such as social-media platforms. International transfers are made within the framework of KVKK's international-transfer provisions (KVKK Art. 9) and in accordance with your explicit 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 TÜRKiYE's Personal Data Retention and Destruction Policy and our VERBİS records.

are retained; at the end of the retention period, they are deleted, destroyed or anonymised.

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

Under KVKK Art. 11, you have the right to learn whether your personal data are processed, learn the purposes of processing, know the third parties to whom your data are transferred, request rectification/deletion/destruction, object to processing and request compensation for damage. You also reserve the right to lodge a complaint with the Supervisory Authority in your home 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 may submit an application through the following channels.

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.