POLICY ON THE PROCESSING AND PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

1. Purpose

This Policy has been prepared by the data controller TT HOTELS TURKEY OTEL HİZ. TUR. VE TİC. A.Ş. ("TT HOTELS") to ensure the processing, secure storage, transfer and destruction of special categories of personal data in accordance with the Personal Data Protection Law No. 6698 ("KVKK"), relevant secondary legislation, KVKK guidelines and international standards. Its purpose is to protect the rights of data subjects, ensure transparency and establish a culture of lawful data processing within our Company.

Our Company acts with utmost care in the processing of special categories of personal data and provides a secure data processing infrastructure by implementing all technical and administrative measures for the protection of such data. This Policy demonstrates our respect for the privacy of all data subjects.

2. Scope

The policy covers all special personal data processing activities carried out within TT HOTELS. Special 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.

Special categories of personal data, 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
Obligation of Confidentiality: It is the obligation of people who access private data not to share this data with third parties.
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 KVVK/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. Operation

5.1. 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.

5.2. Data Processing Purposes

As TT HOTELS, special personal data may be processed for the following purposes:

- Protection of public health,
- Fulfilling occupational health and safety obligations,
- Providing medical diagnosis and health services,
- Disabled employment and SSI notification processes,
- Providing services specific to guest health (e.g. special meals, allergy warning),
- Personnel transactions and fulfillment of legal obligations,
- Ensuring physical space security (biometric recording, criminal conviction control, etc.),
- Providing information to authorized persons, institutions and organizations,
- KVKK and other purposes for which express consent has been obtained within the scope of relevant legislation.

5.3. Data Processing Terms

Within the scope of Article 6 of KVKK, special personal data can be processed under the following conditions:

- Explicit Consent: In line with the informed and free will consent of the data owner.
- Health and Sexual Life Data: Only for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services and financing health services; by persons or authorized institutions under the obligation of confidentiality.

- Other special quality data: Can be processed without explicit consent only if it is clearly provided for by law or if the person concerned is unable to give consent due to actual impossibility (for example, unconsciousness, emergency intervention required for health reasons, etc.).

5.4. Technical and Administrative Measures

The following technical and administrative measures are taken to ensure the security of sensitive 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.

5.5. Domestic and International Data Transfer

In accordance with the "Regulation on Procedures and Principles for the Transfer of Personal Data Abroad", the transfer of personal data abroad is only possible through standard contracts published by the Personal Data Protection Authority. International data transfers carried out by TT HOTELS are carried out only in accordance with Article 9 of KVKK and the said regulation.

Special categories of personal data are transferred domestically or abroad only under the following conditions:

- In domestic transfer: In case of explicit consent of the relevant person or if there is a legal obligation,

- For transfer abroad: Taking into account the list of countries with adequate protection or provided that standard contracts approved by the Board are signed.

Transfers are made only by encrypted, secure and access-restricted methods. TT HOTELS pays utmost attention to data security during the transfer of sensitive personal data; It makes transfers only when necessary and in full compliance with the legislation.

10. Storage and Destruction of Special Personal Data

In line with our Storage and Destruction Policy, special personal data are deleted, destroyed or anonymized by secure methods in case the purpose for which they are processed is eliminated or the legal retention period expires.

- In physical environment: Destroyed with a document shredder.
- In electronic environment: It is irretrievably deleted, log records are kept.

11. Education and Awareness

All relevant personnel are trained on the protection of sensitive personal data at least once a year. Training content: KVKK, special data awareness, data breach precautions, criteria for transfer abroad.

12. Management and Updating 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.

13. 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.

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