

**PRIVACY NOTICE REGARDING MARKETING ACTIVITIES**  
**(ACCOMMODATION FORM – OFFERS/INNOVATIONS VIA E-MAIL)**

**1. Purpose and Scope**

This Marketing Activities Privacy Notice ("Privacy Notice") has been prepared in accordance with the Law No. 6698 on the Protection of Personal Data ("KVKK") to inform you about the processing of your personal data within the scope of "providing information about interesting innovations, current offers, or additional services for your next holiday at regular intervals in the future" as stated in the Registration Form.

Within the scope of this notice, the data controller shall be referred to as THR TÜRKİYE\*. (\*THR TÜRKİYE represents the legal entities of 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., all under the partnership umbrella of TUI A.G. Each group company is exclusively considered a data controller regarding the processing, storage, transfer, and sharing of data.)

This Privacy Notice does not replace the guest information notices regarding mandatory accommodation processes such as the performance of accommodation services, identity notification, facility security, reservation management, etc. Data processing for marketing purposes is not a compulsory part of the accommodation service. If you do not wish to receive marketing communications, it will not prevent you from using the accommodation services.

**2. Processed Personal Data**

The following categories of your personal data may be processed within the scope of marketing activities:

- Identity/Reservation associated information (Limited): Name and surname (to personalise communication and manage to whom the communication is sent).
- Contact Information: E-mail address (if provided as "optional" in the accommodation form and/or separately within the scope of marketing consent).
- Consent and Preference Records: Whether you have marketing consent, date/channel of consent, scope of consent (e.g., campaign/offer via e-mail), record of withdrawal of consent, record of rejection/cancellation.
- Communication Process Records: Despatch logs (date and type of communication sent), technical records such as delivery/read status (depending on the nature of the system used).

As a rule, processing data such as identity number/passport number, date of birth, or health data is not necessary for marketing activities. Such data are not processed for marketing purposes.

**3. Purposes of Processing Personal Data**

Your personal data may be processed for the following purposes:

1. Establishing Marketing Communication: Informing you via e-mail about innovations, current offers, campaigns, and additional services for your next holiday planning.
2. Consent/Preference Management and Compliance: Obtaining marketing consent, managing its scope, maintaining evidentiary records, and fulfilling your rejection/cancellation requests.

3. Execution of Communication Processes and Service Quality: Technically ensuring deliveries, ensuring system security and continuity, preventing inappropriate mailings, and managing errors/complaints.

#### **4. Method of Collecting Personal Data**

Your data within the scope of marketing can be collected in physical (paper form) and/or electronic environments through:

- Providing e-mail information optionally in the Registration Form,
- Declaring your approval/rejection preference in the marketing section of the registration form,
- E-mail addresses and preferences you share separately for marketing consent,
- Systemic log records generated during the despatch of marketing communications.

#### **5. Legal Grounds (Within the Scope of KVKK Art. 5)**

The legal basis for processing your personal data within the scope of marketing activities is primarily:

Your Explicit Consent in accordance with KVKK Art. 5/1.

Furthermore, for limited purposes such as management and proof of marketing consent, and security and management of communication processes:

- KVKK Art. 5/2-ç (legal obligation) and/or
- KVKK Art. 5/2-f (legitimate interest) conditions may be relied upon only to the extent necessary (e.g., storage of consent records, maintaining rejection/cancellation records, system security logs). Explicit consent must be given of one's own free will. Not giving marketing consent or withdrawing consent given does not affect the provision of accommodation services.

#### **6. Parties to Whom Personal Data May Be Transferred and Transfer Purposes**

Your personal data may be shared with the following recipient groups in accordance with KVKK for the purpose of carrying out marketing activities:

- Group Companies / Subsidiaries (in case of marketing operations, guest relations management, or use of a centralised system; limited only to necessary data),
- Service Providers / Suppliers (e.g., e-mail delivery infrastructure, CRM, marketing automation, IT support, cloud services) – solely for the purposes of establishing marketing communication and operating the system,
- Authorised Public Institutions and Organisations (upon request, within the scope of legal obligations and limited to the request).

If the infrastructures used in marketing processes are located abroad or if the group companies are located abroad, your personal data may be transferred abroad. Transfer abroad will be carried out in accordance with the provisions of KVKK Art. 9 to countries where the Board has an adequacy decision, or if there is no adequacy, by providing appropriate safeguards (e.g., standard contractual clauses announced by the Board). Detailed information regarding the scope of the transfer abroad, recipient groups, and the infrastructure used will be provided to you upon request via our KVKK application channels.

#### **7. Retention Periods**

Your personal data processed within the scope of marketing activities are stored:

- As long as your marketing consent is valid, and
- Following the withdrawal of consent/rejection, limited to the period necessary for the purpose of proof in legal disputes and compliance with legislation.

At the end of these periods, your data will be deleted, destroyed, or anonymised in accordance with the Personal Data Retention and Destruction Policy.

## **8. Your Rights Under KVKK (Art. 11)**

In accordance with Article 11 of the KVKK, regarding your personal data, you have the right to:

- Learn whether it is processed,
- Request information if processed,
- Learn the purpose of processing and whether it is used in accordance with its purpose,
- Know the third parties to whom it is transferred domestically or abroad,
- Request rectification if it is incomplete/incorrectly processed,
- Request its erasure/destruction within the framework of the conditions stipulated in the KVKK,
- Request notification of rectification/erasure/destruction processes to the third parties to whom it was transferred,
- Object to an unfavourable result arising from the analysis of processed data exclusively through automated systems,
- Request compensation for damages in case of loss due to unlawful processing.

Application Method: To exercise your rights, you may apply through one of the following methods:

- In person: Hotel General Management
- In writing: Güzeloba Mah. Havaalanı Cad. No:64/Z1-Z2 Muratpaşa / Antalya.
- Via E-Mail: [dpo@tuihotels.com.tr](mailto:dpo@tuihotels.com.tr) Your applications will be responded to within the periods stipulated in the KVKK.

## **9. Security**

Measures To protect your personal data, technical and organisational measures are implemented, such as:

- Limiting access privileges and role-based authorisation,
- Appropriate security measures in communication and data transfer (e.g. encryption, secure connection),
- Implementation of logging and security software,
- Firewalls and anti-virus software,
- Confidentiality and data security obligations in supplier/service provider contracts,

- Confidentiality and KVKK awareness training for employees.

#### **10. Withdrawal of Explicit Consent / Stopping Marketing Communication**

You may withdraw your explicit consent for marketing communication at any time. The withdrawal of consent does not affect the lawfulness of the data processing prior to the withdrawal. To withdraw your consent/stop receiving communications, you can use the following channels:

- Hotel General Management
- In writing: Güzeloba Mah. Havaalanı Cad. No:64/Z1-Z2 Muratpaşa / Antalya.
- Via E-Mail: [dpo@tuihotels.com.tr](mailto:dpo@tuihotels.com.tr)

#### **11. Updates**

This privacy notice is updated and organised as needed. The latest version will be notified to you or published on our website.

Date of Update: 14.05.2026