

## 1. **Policy, Scope and Purpose**

1.1 Ulusoy Turizm İşletmeleri A.Ş. (Hereinafter referred to as "Kemer Holiday Club Hotel".) Board of Directors and management, the Republic of Turkey concerning the protection of personal data Constitution of 6698 No. Personal Data Protection Act (KVKK) and to abide by that principle and rules set by other legislation and data by Kemer Holiday Club Hotel is committed to protecting the rights and freedoms of committed individuals. For this purpose, the Board of Directors has adopted a written personal data protection policy and system to be implemented and improved.

### 1.2 **Scope**

Policy provisions cover all information systems and sub-information, contracts, environmental and physical areas, and systems and regulations produced for all of these, which are involved in the processing of personal data in Kemer Holiday Club Hotel's fields of activity and work areas.

This policy covers all units of Kemer Holiday Club Hotel, staff of the company providing support services, visitors, third parties, intern and contracted personnel.

### 1.3 **Purposes of the Personal Data Protection Policy and System**

The purpose of the Personal Data Protection Policy and System is to ensure that Kemer Holiday Club Hotel sets and realizes its own standards in data management; determining and supporting organizational goals and obligations, establishing control mechanisms in line with the acceptable risk level of Kemer Holiday Club Hotel; It is the fulfillment of the obligations that Kemer Holiday Club Hotel is subject to in accordance with the international conventions in the field of personal data protection, the Constitution, laws, conventions and professional rules, and the protection of the interests of individuals in the best way.

1.4 Kemer Holiday Club Hotel will comply with the personal data protection legislation and data protection principles. The data protection principles adopted by Kemer Holiday Club Hotel include:

- a. Processing personal data only if clearly necessary for legitimate corporate purposes;
- b. To process the minimum amount of personal data required for these purposes and not to process more data than necessary;
- c. Providing individuals with clear information about who and how their personal data is used;
- d. To process only relevant and appropriate personal data;
- e. To process personal data fairly and lawfully;
- f. Keeping an inventory of personal data categories processed by Kemer Holiday Club Hotel;
- g. Keeping personal data accurate and up-to-date when necessary;
- h. To keep personal data only for the period required by legal regulations, legal obligations or legitimate corporate interests of Kemer Holiday Club Hotel;
- i. Respecting the rights of individuals regarding their personal data, including the right to access;
- j. Keeping all personal data safe;

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- k. To transfer personal data abroad only if there is sufficient protection;
- l. To apply exceptions permitted under the legislation;
- m. Establishing and implementing the personal data protection system for the implementation of the policy;
- n. To determine the internal and external stakeholders that are parties to the personal data protection system and to what extent they are included in the personal data protection system of Kemer Holiday Club Hotel when necessary;
- o. To determine the personnel / s who have special powers and responsibilities regarding the personal data protection system.

## Notices

- 1.5 Kemer Holiday Club Hotel informs the Personal Data Protection Board ("KVK Board") about which it is the data controller and which categories of personal data it processes in this capacity. Kemer Holiday Club Hotel defines all categories of personal data it processes in its personal data inventory.
- 1.6 The notification is made in accordance with the procedure and method to be determined by the KVK Board and a copy of the notification is kept by Kemer Holiday Club Hotel.
- 1.7 Notifications are repeated periodically if necessary.
- 1.8 Data processing activities of Kemer Holiday Club Hotel and changes in these are reviewed annually in order to determine potential changes that may occur in the notification made to the KVK Board and the KVKK Board is informed if necessary.

The disciplinary legislation of Kemer Holiday Club Hotel will be applied to all actions of all units of Kemer Holiday Club Hotel, the staff of the company providing support services, the intern and the contracted personnel that violate this policy and in case the violation constitutes a crime or a misdemeanour the situation shall be reported to the relevant authorities as soon as possible.

Solution partners of Kemer Holiday Club Hotel who have access or have the possibility to access personal data and all third parties working with Kemer Holiday Club Hotel are invited to read this policy and to comply with the policy. None of the third parties can access personal data processed by Kemer Holiday Club Hotel without a written confidentiality agreement, which includes the obligations of at least as strong as Kemer Holiday Club Hotel in terms of the protection of personal data and the right to audit Kemer Holiday Club Hotel in relation to these.

## 2. Definitions

**Explicit Consent:** Consent about a specific subject based on information and expressed in free will,

**Anonymization:** Making personal data unlikely to be associated with any identified or identifiable real person in any way even when personal data is paired with other data.

**Related person:** The real person whose personal data is processed,

**Personal Information:** Any information related to the identified or identifiable real persons,

**Sensitive personal data:** Information about security measures with biometric and genetic data of people with respect to race, ethnicity, political thought, philosophical

belief, religion, sect or other beliefs, appearance and clothing, membership to an association, foundation or trade union, medical condition, sexual life, criminal conviction.

**Processing of Personal Data:** All kinds of processes performed on personal data including obtaining, recording, storing, keeping, changing, re-arranging, disclosure, transmission, acquisition, making available, classification or prevention of use in whole or in part, automatically or in non-automatic ways, being part of any data recording system,

**KVKK:** Law No. 6698 on the Protection of Personal Data,

**KVKK Board:** Personal Data Protection Board,

**KVKK Institution:** Personal Data Protection Authority,

**Data Processor:** A natural or legal person who processes personal data on his behalf on the basis of the authority conferred by the data officer,

**Data Recording System:** Recording system in which personal data is processed by organizing according to certain criteria,

**Data controller:** It refers to real or legal person responsible for identifying the purposes and means of personal data processing and installing and managing data recording system,

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### **3. Duties and Responsibilities**

**3.1** Kemer Holiday Club Hotel is the data controller in accordance with KVKK.

**3.2** All personnel, especially those in senior management, manager and auditor positions, are responsible for the development and encouragement of correct practices in the processing of personal data within Kemer Holiday Club Hotel, as well as for other liabilities related to this issue included in individual job descriptions.

**3.3** The KVK Committee has been established as a unit responsible for managing the personal data protection system and ensuring and documenting compliance with KVKK and other relevant legislation and is responsible to the Board of Directors in these matters.

#### **3.3.1 KVK Committee**

KVK Committee members are appointed by the board of directors, taking into account their expertise and experience in personal data protection legislation and practices, and report directly to the Board of Directors.

#### **3.3.2 Duties and Responsibilities of the KVK Committee**

**3.3.2.1** The Committee should inform the Board of Directors about the Personal Data Protection legislation and developments.

**3.3.2.2** The Committee is responsible for ensuring that the Kemer Holiday Club Hotel's policies and procedures are up-to-date and that data processing audits are carried out in accordance with the scheduled schedule and that they comply with the relevant legislation.

**3.3.2.3** The Committee acts together with all relevant personnel on personal data protection issues.

**3.3.2.4** The main duties and responsibilities of the committee are:

- Providing information and advice on personal data protection legislation and compliance to Kemer Holiday Club Hotel, its related partners and suppliers providing support services.
- Providing information and advice to the Kemer Holiday Club Hotel staff about their obligations in accordance with personal data protection legislation.
- To observe the compliance of Kemer Holiday Club Hotel's data processing activities with personal data protection legislation.
- To contribute to the development and maintenance of Kemer Holiday Club Hotel's personal data protection policy and related procedures and processes.
- To assign responsibilities within Kemer Holiday Club Hotel in the context of compliance with personal data protection legislation.
- To ensure that all personnel involved in personal data processing are provided with the necessary training and awareness.
- Performing regular audits, observing compliance with Personal data protection legislation and reporting to the Board of Directors.
- Cooperation and liaison with the KVK Board.
- To determine the responsible persons who will function as the contact point and representative of Kemer Holiday Club Hotel before the KVK Board.
- Developing a formal procedure for reporting personal data breach incidents and investigations to the Board.
- Contributing to the business continuity plan process.
- To provide information and advice on keeping corporate records.
- To ensure at what scale personal data is collected, kept and used within the body of Kemer Holiday Club Hotel and that they are kept in accordance with the relevant legislation.
- To supervise and evaluate the suitability, reasonableness, security practices and other controls that may be necessary for the protection of personal data.
- To determine and implement controls to ensure confidentiality, integrity and accessibility of personal data, and to suggest additional controls that may be required.

- To present the issues that pose potential risks in terms of personal data within Kemer Holiday Club Hotel and their related suggestions to the agenda of the Board of Directors

**3.3.2.5** The KVK Committee has the authority to inspect Kemer Holiday Club Hotel in all systems related to the collection, processing and storage of personal data. The KVK Committee may request cooperation from all personnel, including access to systems and records, while performing its duties. If this cooperation is not achieved, the Committee reports the situation to the Board of Directors.

- 3.4** All personnel of Kemer Holiday Club Hotel who process personal data are responsible for complying with the Personal Data Protection legislation.
- 3.5** The Human Resources unit is responsible for carrying out the necessary notifications and trainings so that all personnel are aware of their responsibilities in the field of personal data protection and have the necessary awareness.
- 3.6** **Kemer Holiday Club Hotel staff is obliged to ensure the accuracy and currency of all personal data provided to or related to them by the Kemer Holiday Club Hotel.**

#### **4. Data protection principles**

All personal data processing activities should be carried out in accordance with the following data protection principles. Kemer Holiday Club Hotel's policies and procedures aim to ensure compliance with these principles:

- Complying with the law and rules of good faith.
- Being accurate and up-to-date when necessary.
- Being processed for specific, clear and legitimate purposes.
- Being connected, limited and measured with the purpose of processing.
- Retaining them for the period of time stipulated by the relevant legislation or the period deemed necessary for the purpose of the processing.

#### **4.1 Personal data are processed in accordance with the law and the rule of honesty and transparently.**

Accordingly Kemer Holiday Club Hotel includes disclosure text / privacy statements in data collection channels and related areas regarding the personal data processing activities it performs. The areas where these notifications will be placed and announced by Kemer Holiday Club Hotel, which contain clear and understandable information about whom and which data are processed for what purposes, are determined. These notifications include the following:

- Kemer Holiday Club Hotel's identity and contact information as the data controller,
- The types of personal data processed,
- Purposes of processing personal data,
- The envisaged retention period of personal data,

- Rights of the data subject,
- Third parties with whom data can be shared.

#### 4.2 Personal data can only be processed for specific, explicit and legitimate purposes.

4.2.1 The reasons / purposes for processing personal data are determined in the personal data inventory, and personal data cannot be used other than the specified purpose without any other legal justification or the explicit consent of the data owner.

4.2.2 In the event that conditions arise that require a personal data to be used for purposes other than those specified in the personal data inventory, this situation is reported to the KVK Committee by the relevant personnel / unit. The KVK Committee checks the appropriateness of the new purpose and, if necessary, ensures that the data owner is informed about the new purpose and new data processing activities.

#### 4.3 Personal data should be appropriate and relevant, processed to a limited extent for the purpose.

4.3.1 Kemer Holiday Club Hotel is obliged to ensure that personal data that are not explicitly required for the purpose of processing are not collected and processed.

4.3.2 Kemer Holiday Club Hotel periodically, checks that the data processed through the personal data inventory is appropriate and relevant.

4.3.3 Kemer Holiday Club Hotel audits that all data processing methods are appropriate and relevant with the internal audit and / or external audit to be carried out on an annual basis.

4.3.4 Kemer Holiday Club Hotel is responsible for the cessation of data processing in terms of personal data that is determined to be unsuitable, unrelated or excessive for the purpose of processing and for the safe destruction of the processed data in accordance with the storage and destruction procedure.

#### 4.4 Data must be accurate and up to date.

4.4.1 The accuracy and currency of data kept for a long time should be reviewed.

4.4.2 The manager of the Human Resources unit is responsible for training all personnel on accurate and up-to-date collection and retention of personal data.

4.4.3 The accuracy and up-to-dateness of the data kept for the personnel is under the responsibility of the relevant personnel.

4.4.4 Staff / customers and other relevant persons should inform Kemer Holiday Club Hotel in order to update the personal data. Upon such notification, it is the responsibility of the relevant unit to correct and update the said record.

4.4.5 The KVK Committee may instruct the relevant unit to review the accuracy or currency of certain data through the evaluation of the data inventory, the type, storage period and amount of the processed data.

#### 4.5 Personal data should only be processed if necessary for the purpose of data processing.

4.5.1 Back-up of personal data, etc. Personal data should be encrypted or anonymized / masked in order to protect the status and freedom of individuals in cases of data security weakness in case of storage beyond the required period due to requirements.

4.5.2 It is subject to the written approval of the KVK Committee for the processing of personal data after the periods determined in accordance with the Storage and Destruction Policy.

## 5. Rights of Data Owners

About data owners Kemer Holiday Club Hotel has the following rights in relation to data processing activities and records with him:

- 5.1 Becoming aware of whether the personal data has been processed or not,
- 5.2 To request information if your personal data has been processed,
- 5.3 To learn the purpose of processing personal data and whether they are used in line with their purpose,
- 5.4 To know about the third parties to whom personal data are transferred domestically or abroad,
- 5.5 to request the rectification of incomplete or inaccurate data, if any,
- 5.6 Request the deletion or destruction of personal data for which there is no legal justification or basis for processing in accordance with the KVKK or this policy,
- 5.7 Request notification of the correction or deletion made upon his request to third parties to whom personal data have been transferred,
- 5.8 To object to any adverse consequences arising as a result of processed data being analyzed solely by automatic systems,
- 5.9 To claim compensation in case of suffering loss due to illegal processing of the personal data.

Data owners can request access to their personal data and to exercise their rights listed above. These requests are answered within 30 days. The processes for receiving, transmitting and finalizing the requests are carried out in accordance with the Request Management Procedure.

Data owners submit their requests to our headquarters by filling out the KVKK Application Form delivered by hand to the address "GÖYNÜK MAHALLESİ AHU-ÜNAL AYSAL CADDE NO: 1/11 / KEMER ANTALYA" through a notary or via a registered letter with return receipt or via the e-mail address registered to [ulusoyturizmisletmeleri@hs02.kep.tr](mailto:ulusoyturizmisletmeleri@hs02.kep.tr).

Kemer Holiday Club Hotel is obliged to direct all personnel, regardless of their job description, to the data owners regarding the correct application method for their data subject access requests. Kemer Holiday Club Hotel, staff should be informed and trained on how to act on requests from data subjects.

## 6. Obtaining Open Consent

Kemer Holiday Club Hotel, accepts the consent of the data subject as explicit consent, which is based on information and free will, expressed by written / verbal declaration or explicit confirmatory action, regarding certain data processing activities by the data subject. In terms of sensitive data, explicit consent is always obtained in writing. Explicit consent can always be revoked by the data owner.

Explicit consent can be obtained by having the explicit consent form template signed by the data owner or by including the elements in this template in the contract to be made with the data owner or in the electronic form. In terms of routinely processed personal data regarding personnel, candidates and customers, explicit consent is obtained through the relevant contract or forms.

In the event that data processing based on explicit consent will be continuous or repeated, the relevant unit keeps a list of persons whose explicit consent has been obtained as a single list. Keeping this list up to date and accurate is under the responsibility of the relevant unit. Explicit consent forms or other relevant means of proof regarding data processing based on explicit consent are kept by the relevant unit.

## 7. **Data Security**

All personnel are obliged to ensure that personal data processed by Kemer Holiday Club Hotel and under their responsibility are kept securely.

Only those who need access to personal data should have access to it. The security of personal data is provided in accordance with Kemer Holiday Club Hotel's KVKK Policy and related documents.

Information security incidents regarding personal data are reported by Kemer Holiday Club Hotel to the KVKK Board and the relevant person as soon as possible.

## 8. **Data Sharing**

8.1 Personal data can only be shared with third parties in accordance with the law and fairness. Accordingly, one of the following conditions is sought in order to share personal data:

- Obtaining the explicit consent of the data owner.
- It is expressly stipulated in the law.
- In case it is obligatory to protect the life or bodily integrity of the person who is unable to state his/her consent due to the actual impossibility or whose consent is not legally valid.
- Provided that it is directly related to the establishment or performance of a contract to which Kemer Holiday Club Hotel is or will be a party, the contract It is necessary to process personal data belonging to the parties.
- It is mandatory for Kemer Holiday Club Hotel to fulfill its legal obligation.
- Being publicized by the person concerned.



- Data processing is mandatory for the establishment, use or protection of the rights of Kemer Holiday Club Hotel.
- Data processing is mandatory for the legitimate interests of Kemer Holiday Club Hotel, provided that it does not harm the fundamental rights and freedoms of the person concerned.

**8.2** Personal data can only be transferred abroad provided that the above conditions are met and that adequate protection is available in the target country and the explicit consent of the data owner is obtained for this transfer.

In the transfer of personal data abroad, the list of countries with sufficient protection determined by the KVK Board is taken into account.

When it comes to the transfer of personal data abroad, it is ensured that the necessary permission and notification procedures are made before the KVK Board in accordance with the KVKK and the relevant legislation.

**8.3** In the event that there is a regular data sharing relationship without a legal basis or legal obligation, a KVKK Commitment is made that determines the conditions of data sharing with the party in question. At a minimum, the KVKK Commitment includes:

- The purpose or purposes of the sharing;
- Potential third party buyers or type of recipient and right of access conditions;
- What categories of data to be shared (should be kept to the minimum necessary for your purposes);
- General principles of data processing;
- Data Security Measures;
- Retention period of shared data;
- Data subject's rights, access requests, procedures to respond to applications and complaints;
- Reviewing the termination of the sharing agreement and
- Responsibility and sanctions for non-compliance or individual breach of staff.

## **9. Personal Data Processing Purposes, Personal Data Owners, Personal Data Categories and Shared Party Categories within the Scope of Personal Data Processing Activities Carried Out by Kemer Holiday Club Hotel**

### **9.1 Personal Data Processing Purposes**

Data processing purposes within the scope of personal data processing activities carried out by Kemer Holiday Club Hotel within the scope of Data Controllers Registry Information System are as follows:

- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of the Application Process of Employee Candidates
- Execution of Employee Satisfaction and Loyalty Processes

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- Employee Contract and Fulfillment of Obligations Arising From Legislation
- Execution of Vested Benefits and Benefits Processes for Employees
- Conducting Training Activities
- Execution of Access Authorities
- Conducting Activities in Compliance with Legislation
- To conduct Financial and Accounting works,
- Ensuring Physical Space Security
- Execution of Assignment Processes
- Conducting Communication Activities
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Execution of Goods / Services Purchasing Processes
- Execution of Goods / Service Sales Processes
- Execution of Customer Relationship Management Processes
- Conducting Activities for Customer Satisfaction
- Execution of Performance Evaluation Processes
- Execution of Contract Processes
- Tracking of Requests / Complaints
- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Management Activities,
- Creating and Following up Visitor Logs
- Receiving and Evaluating Suggestions for the Improvement of Business Processes
- Following Up and Conducting Legal Affairs
- Conducting Audit / Ethical Activities
- Conducting Emergency Management Processes
- Execution of Goods / Services After Sales Support Services
- Execution of Storage and Archive Activities
- Execution of Strategic Planning Activities

## 9.2 Personal data owners have rights;

<b>PERSONAL DATA OWNER CATEGORY</b>	<b>REMARKS</b>
<b>Employee Candidate</b>	Real persons who have applied for a job to Kemer Holiday Club Hotel in any way or who have opened their CV and related information to Kemer Holiday Club Hotel.
<b>Employee</b>	Employees whose personal data are processed within the framework of activities, employee satisfaction, audit, legal compliance etc. activities carried out by Kemer Holiday Club Hotel.
<b>Shareholder / Partner</b>	Kemer Holiday Club Hotel's shareholder / partner real or legal persons

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<b>Supplier Employee</b>	While conducting the commercial activities of the Kemer Holiday Club Hotel, in accordance with the orders and instructions of the Kemer Holiday Club Hotel, on a contract basis, the Kemer Holiday Club Hotel e service provider employee.
<b>Supplier Executive</b>	Providing service to Kemer Holiday Club Hotel on a contract basis in accordance with the orders and instructions of Kemer Holiday Club Hotel, officials.
<b>Product or Service Receiver</b>	Regardless of whether they have any contractual relationship with Kemer Holiday Club Hotel, real persons whose personal data are obtained through business relations within the scope of the operations carried out by the business units of Kemer Holiday Club Hotel.
<b>Visitor</b>	Real persons who enter the physical campuses owned by Kemer Holiday Club Hotel for various purposes or visit our websites.

## 9.3 Categories of Personal Data

<b>PERSONAL DATA CATEGORIES</b>	<b>REMARKS</b>
<b>Identity Information</b>	It is the data containing information about the identity of the person; name-surname, TR identity number, nationality information, place of birth, date of birth, gender, workplace information, registration number, tax number, title, biography, etc. and documents such as driver's license, professional identity, birth certificate and passport.
<b>Contact Information</b>	Telephone number, address, e-mail address, fax number, etc. information
<b>Transaction Security Information</b>	Your personal data (e.g. log records, IP information, identity verification information) processed to ensure our technical, administrative, legal and commercial security during the execution of our activities.
<b>Personal Information</b>	Data such as employee payroll information, disciplinary investigation, entry-exit document records, asset declaration information, resume information, performance evaluation reports.

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<b>Legal Procedure and Compliance Information</b>	Personal data processed within the scope of detecting and following up our legal receivables and rights, the discharge of our liabilities, and compliance with our legal obligations and our company's policies
<b>Financial Information</b>	All kinds of financial results created according to the type of legal relationship that Kemer Holiday Club Hotel has established with the personal data owner, data such as the processed personal data regarding the information, documents and records showing the bank account number, IBAN number, income information, debt / credit information.
<b>Information on Physical Premises Security</b>	Personal data regarding the records and documents taken during the entrance to the physical space, during the stay in the physical space camera records, vehicle information records and records taken at the security point, etc.
<b>Professional Experience</b>	Information such as diploma information, courses attended, in-service training information, certificates, transcript information
<b>Customer Transaction Information</b>	Information such as call center records, invoice, promissory note, check information, counter receipts information, order information, request information.
<b>Visual and Audio Data</b>	Photo and camera recordings (excluding recordings under Physical Space Security Information) and sound recordings
<b>Health Information</b>	Disability information, blood group information, personal health information, device and prosthesis information etc.
<b>Criminal Convictions and Security Measures</b>	Information on criminal conviction, information on security measures

## 9.4 Shared Party Categories

<b>SHARED PARTY CATEGORY</b>	<b>DESCRIPTION</b>	<b>SHARE PURPOSE</b>
<b>Suppliers</b>	Within the scope of the commercial activities of Kemer Holiday Club Hotel, parties offering services to Kemer Holiday Club Hotel in accordance with the orders and instructions	In order to ensure that the services that the company procures from the supplier externally and that are necessary to fulfill the commercial activities of the company are provided to the company

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		of Kemer Holiday Club Hotel and on a contract basis.	
<b>Authorized Institutions and Organizations</b>	<b>Public and</b>	Public institutions and organizations authorized to receive information and documents from our company in accordance with the provisions of the relevant legislation.	As limited to the purpose requested by the relevant public institutions and organizations within their legal authority
<b>Shareholders</b>		Kemer Holiday Club Hotel's shareholder / partner real or legal persons	Limited to be shared by Kemer Holiday Club Hotel publicly

## 10. Records Management

Personal data cannot be kept longer than necessary for the purposes of processing. The classification of records containing personal data and their retention periods are determined in accordance with the Retention and Destruction Policy.

Personal data, which has expired for the purposes of processing or upon the rightful request of the data owner, are anonymized or deleted or destroyed in a way that the data owner cannot be identified and in accordance with the Storage and Destruction Policy.

## 11. Keeping the Policy Updated

In the meetings held by the KVKK committee, it is decided to update the policy when necessary, and it is kept up-to-date.

### **Document Ownership and Approval**

The owner of this document is the KVK Committee and is responsible for the regular review of this policy in accordance with the above-mentioned review requirements.