

Personal Data Protection and Privacy Policy

Website Confidentiality Agreement

During your visit to this website and your use of the service through this Site, how the information that we receive regarding you and the services you request will be used and

protected are subject to this "Confidentiality Agreement". You hereby accept the conditions stipulated in this "Confidentiality Agreement" when you visit this website and request to use the services we provide through this Site.

I. Purpose of Personal Data Protection and Processing Policy

Until today, data and information of our customers or potential customers are kept confidential and have never been shared with third parties by virtue of the sensitivity of our business as (ŞAH SARAY OTEL). Personal data protection is our essential policy. Even before any legal regulation, our company and subsidiaries had attached a great importance to the confidentiality of personal data, adopted as a working principle and gave working instructions to the employees in compliance with this principle. As (ŞAH SARAY OTEL), we undertake to adhere to all responsibilities of Privacy Act. The principle of our companies to protect personal data also covers our subsidiaries.

II. Scope and Change of Personal Data Protection and Implementation Policy This Policy

prepared by our Company has been regulated in accordance with "Law on Protection of Personal Data" no. 6698 ("KVKK"). The Law has entered into force with all of its provisions as of today. The data received with your consent or pursuant to the other regulations as per the Law shall be used to make our service more quality and to improve our services and quality policy. Again, some of the data we obtain are removed from the scope of personal data and anonymized. These data are used for statistical purposes and not subject to the enforcement of Law and our Policy. "Personal Data Protection and Implementation Policy of (ŞAH SARAY OTEL)" aims and regulates the protection of the data which are automatically obtained from our customers, potential customers, employees and the customers and employees of the companies in cooperation with us for solution partnership and the other parties.

Our company reserves the right to change our Policy and Regulation – provided that such changes comply with the Law and protect the personal data in a better way.

III. Fundamental Principles on Processing of the Personal Data

- a. Being in compliance with the law and integrity: (ŞAH SARAY OTEL) questions the source of the data it collects or sent by other companies and attaches importance to handling these in compliance with the law and integrity. Within this framework, it warns and notifies the third parties (agencies and other intermediary firms) that sell the services provided by (ŞAH SARAY OTEL) to protect the personal data.
- b. Being accurate and up to date, if necessary: (ŞAH SARAY OTEL) attaches importance to the accuracy of all of the data kept within the organization, to the fact that they do not include any misinformation and that personal data are updated only if the changes are notified.
- c. Being processed for specified, explicit, and legitimate purposes: (ŞAH SARAY OTEL) processes the data limited to the services and purposes for which consent of the persons are taken during the services. It shall not process, use and make use of the data out of business purposes.
- d. Being relevant, limited and proportionate to the purposes for which data are processed: (ŞAH SARAY OTEL) uses the data only for processing purposes and to the extent what the service requires.
- e. Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected: (ŞAH SARAY OTEL) keeps the contractual data as long as it's required by the commercial and taxation law as well as the periods of conflicts of law. Nevertheless, it shall delete or anonymize the data in case the reasons necessitating their processing cease to exist.

It is crucial to state that whether (ŞAH SARAY OTEL) collects or processes the data by one's will or in compliance with the law, the abovementioned provisions shall apply anyhow.

You shall have the following rights pursuant to Article 11 of Law on Protection of Personal Data. A separate application shall be prepared by (ŞAH SARAY OTEL) for you to facilitate your related rights.

Regarding the personal data, the relevant person holds the right to do the following by

applying to our official announced on the web page by (ŞAH SARAY OTEL);

- a. To be informed whether his/her personal data are processed or not,
- b. To request information if the personal data are processed,
- c. To learn the purpose of processing the personal data and whether the data are used for the corresponding purposes,
- ç) To get information on the third parties to whom the personal data are transferred in the country and abroad,

- d. In case the personal data are processed incompletely or inaccurately, to request the correction
 - e. To request that personal data are deleted or removed within the framework of the conditions stipulated in law,
 - f. To request that the processes performed as per clause (d) and e are notified to the third parties to whom the personal data are transferred,
 - g. To appeal to the negative results against himself/herself arising from analysis of the data processed exclusively through the automatic systems,
- ğ) In case the personal data are damaged due to the processing of the data contrary to the Law, to request that the damages are indemnified

As (ŞAH SARAY OTEL) we respect and observe these rules.

Maximum Savings Policy/Scrimping Policy

Pursuant to our policy called as maximum savings policy or scrimping policy, the data received by (ŞAH SARAY OTEL) are processed into the system as required. Thus, which data we will collect shall be determined according to the purpose. Unnecessary data shall not be collected. Other data submitted to our company are transferred to the information system of the company in the same way. Redundant information is not stored in the system, they are deleted or anonymized. These data may be used for statistical purposes. Health data among the special quality data are only kept in the system to provide better service to the customers and to protect their health.

Deletion of personal Data

When the retention period necessitated by the Law expires, judicial procedures are completed or other requirements no longer exist, these data shall be deleted, removed or anonymized automatically, by the company or upon the request of the relevant person.

Accuracy and Currency of Data

The data within the body of (ŞAH SARAY OTEL) are processed as declared by the relevant persons as a rule. (ŞAH SARAY OTEL) is not obliged to check up on the accuracy of the data declared by the customers or the persons in touch with (ŞAH SARAY OTEL) and it's also contrary to the Laws and our working principles. The declared data are regarded as correct and accurate. The principle of accuracy and currency of personal data has also been adopted by (ŞAH SARAY OTEL). The personal data processed upon the

request of the relevant person or from official documents that are submitted to our company are updated. Necessary precautions are taken for this purpose.

Confidentiality and data security

Personal data are confidential and (ŞAH SARAY OTEL) obeys the rule of confidentiality. Only authorized persons shall access the personal data. All necessary technical and administrative measures are taken to protect the personal data collected by (ŞAH SARAY OTEL) and to prevent the damage on our customers and potential customers. Within this framework, it shall be ensured that the software complies with the standards, third parties are selected with caution and data protection policy is observed within the company.

IV. Purpose of Data Processing

Collection and processing of personal data by (ŞAH SARAY OTEL) shall be executed in line with the purposes stipulated in the letter of clarification. The data are collected and processed to draw up contracts and provide better services to the customers.

V. Data of Customer, Potential Customer and Business and Solution Partners

Collection and processing of data for contractual relationship

In case of a contractual relationship with our customers and potential customers, the collected personal data may be used without the approval of the customers. However, such use shall be for the purpose of the contract. The data shall be used for better execution of the contract and as required by the services and updated, if necessary, by contacting the customers. Nevertheless, the data provided to us by our potential customers shall be processed to easier and more quality services later. These data shall be deleted upon requests in case of lack of any contractual relationship.

Data of Business and Solution Partners

(ŞAH SARAY OTEL)adopts as a principle to act in compliance with the laws when exchanging the data both with business and solution partners. The data are shared with the business and solution partners with the understanding of data confidentiality and as required by the services and it's definitely ensured that these parties take measures regarding the data security.

Data processing for advertisement purposes

Electronic messages for advertisement purposes can only be sent to the persons with prior consent in compliance with the Law on the Regulation of E-Commerce and the Law on Commercial Communication and Commercial Electronic Messages. An explicit consent of the person is required to send advertisements. (ŞAH SARAY OTEL) obeys the details of "the consent" specified in the same

legislation. The consent to be obtained should cover all commercial electronic messages that are sent to the electronic communication addresses of the recipients to promote and market the goods and services of the company, to promote the business or to increase the recognition level of the company with contents including greetings and wishes. This consent may be obtained via any electronic communication channel or at physical medium in written. The important thing is to obtain the declaration of the recipient that he/she accepts to receive commercial electronic messages and to have his/her full name and electronic communication address.

Data processing due to legal obligations of the company or being stipulated explicitly in the Law

Personal data may be processed without prior consent when it's stipulated explicitly in the relevant legislation or to fulfil a legal obligation specified in the legislation. Type and scope of the data processes are required for data processing activity that is permitted by the Laws and they should comply with the relevant legal provisions.

Data processing by company

Personal data may be processed pursuant to the legal purposes and the services of the company. However, the data shall not be used for services contrary to the laws under any circumstances.

Processing of special quality data

Pursuant to the Law, race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothes, membership of association, foundation or union, health, sexual choice, juridical sentence and data regarding safety measures and biometric and genetic data are among the special quality data. (ŞAH SARAY OTEL) also takes adequate measures determined by the Board for the processing of special quality data.

(ŞAH SARAY OTEL) may process the special quality data only for the corresponding purposes to provide better services.

Data processed with automatic systems

(ŞAH SARAY OTEL) acts in compliance with the Law for data processed with automatic systems. The information obtained from these data without the explicit consent of the persons shall not be used against the person. However, (ŞAH SARAY OTEL) may take decisions regarding the persons that it will perform process by using the data within the system.

User's details and internet

In case of collection, processing and use of personal details in web sites and other systems or applications of (ŞAH SARAY OTEL), the concerned persons are informed with confidentiality notice and about needed cookies if needed. Persons are informed about our applications of web pages. Personal details shall be processed in compliance with laws. Regarding cookies used/to be used at our pages when you visit our web page, following information is hereby presented for your attention.

Data processed with automatic systems

Data processed with automatic systems in respect to employees can be used in internal promotion and performance assessments of the company. Our employees are entitled to raise objection against consequences thereof against them and shall raise objection in compliance with internal procedures of the company. Objections made by the employees shall be evaluated by the company.

Google (analytics, doubleclick)

Purpose of Use of cookies: Measurement Advertisement Site

Improvement Type of cookie : Functional and analytical Cookies

Trade Cookies

Facebook

Purpose of Use of cookies :

Advertisement Type of cookie :

Trade Cookies Insider

Purpose of Use of cookies : Measurement Advertisement Site

Improvement Type of cookie : Functional and analytical Cookies

Trade Cookies

Hotjar

Purpose of Use of cookies : Measurement Site

Improvement Type of cookie : Functional and analytical

Cookies Trade Cookies 3 rd party companies (...)

Purpose of Use of cookies : Advertisement

Type of cookie : Functional and analytical Cookies Trade Cookies

Functional and analytical

Cookies contain data to remind your preferences, effective use of internet site, optimization of site to respond to requests of users and information about how the site is used by visitors. As a nature, cookies of such type may contain your personal data such as user name etc.

Third Party cookies

(ŞAH SARAY OTEL) internet sites/mobile applications/mobile internet sites run with third party reliable, well-known advertisement providers. Third party service providers place their own cookies in order to be able to offer special advertisements for you. Third party placed cookies collect navigation details of visitors at visited internet sites, processes them and analyses how they use it.

Commercial cookies

They improves your use experience by offering quality products/contents similar to your targeted ones based your interest fields and selections by presenting more developed and personalized advertisement portfolio. The period of keeping above mentioned session for permanent, functional and analytical and commercial cookies in background is about 2(two) months and required settings can be made from personal internet browser settings.

Removing from such settings may change subject to internet browser.

If your operation is not completed at reservation stage due to system errors or disconnections, our call centre representative will contact you.

How can I delete cookies?

Most internet web browsers are set to accept and use cookies automatically from initial installation. You can block cookies or request warning from your device when cookies are sent by use of help or setting menus of your internet browser. You can also read instruction or help option menu of your browser to get detailed information on how to make settings of your browser or get more information about different ways of cookies management.

Purposes of Collecting security date and Processing them at Plants

Security footages taken during your visit to (ŞAH SARAY OTEL) that act in the capacity of data controller within the scope of Law numbered 6698 are collected to ensure security of both you and our company and to provide service to you securely. Your personal data are not used for the purposes other than stated and processed based on the cause of action of the data controller for its legitimate interests as per clause (f) of article 5/2 of The Law on Protection of Personal Data. Collected personal data cannot be shared with any third person or entity pursuant to the rules. However, they can be shared to meet the demands of state

institutions and organizations authorized by law to fulfil the legal obligation stipulated in clause (ç) of article 5/2 of the Law. When the purpose of collecting your data isn't deemed

valid anymore, your data will be destroyed.

VI. Data of our Employees

Processing of data for contractual relationship Personal data of our employees can be processed as required for contractual relationship and health insurances without need to get consent. However, (ŞAH SARAY OTEL) ensures confidentiality and protection of its employees' data.

Processing due to legal obligations

(ŞAH SARAY OTEL) may process personal data of its employees without consent when it is stipulated explicitly in the relevant legislation or to fulfil a legal obligation specified under the legislation. This is limited to the liabilities arising from the law.

Processing for Benefit of Employees

(ŞAH SARAY OTEL) may process personal data of its employees without consent for operations in benefit of its employees. (ŞAH SARAY OTEL) may process personal data of its employees in connection with disputes arising out of contractual relations.

Processing data of special quality

Pursuant to the Law, race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothes, membership of association, foundation or union, health, sexual choice, juridical sentence and data regarding safety measures and biometric and genetic data are among the special quality data. (ŞAH SARAY OTEL) also takes adequate measures determined by the Board for the processing of special quality data. The special quality data may be processed only in connection with the cases allowed under the law without consent of the person and in limited manner. Special quality data obtained from our employees are tailored and used only for purpose so as to enable them to benefit from insurance and health services.

Telecommunication and internet

Computers, telephones, e-mail and other applications allocated for employees in the company are allocated to them only for work purpose. The employee is not allowed to use any of such instruments allocated to him/her by company for his/her special purposes and communications. The company may control and inspect all data in such instruments. The employee hereby undertakes that s/he

will not keep any data or information other than work in computer, phone or other instruments allocated to him/her starting as of his/her employment date.

VII. Transfer of personal data Domestically and internationally

Personal data may be shared with business and solution partners for the purpose of providing the services by (ŞAH SARAY OTEL).

(ŞAH SARAY OTEL) will be entitled to transfer the personal data for certain purposes to the following person and institutions

» Business partners of (ŞAH SARAY OTEL) limited to the purpose of execution of the aims of

the establishment of the business partnership

» The suppliers of (ŞAH SARAY OTEL) to the extent of providing the necessary services by our company to fulfill its commercial activities and procured by the supplier as external sources,

» Solution partners of (ŞAH SARAY OTEL) limited to ensuring the execution of the commercial activities which require the participation of the affiliates of the company,

» (ŞAH SARAY OTEL) is authorized to transfer the personal data domestically and internationally within the conditions determined by the Board and in compliance with the other provisions in the Law and depending on the consent of the person.

VIII. Rights of the Relevant Person

(ŞAH SARAY OTEL) hereby agrees that the relevant person must provide his/her consent before processing the data within the scope of the Law and he/she reserves the right to determine the destiny of the data after the data is processed.

Regarding the personal data, the relevant persons holds the right to do the following by

applying to our official announced on the web page by (ŞAH SARAY OTEL);

- a. To be informed whether his/her personal data are processed or not,
- b. To request information if the personal data are processed,
- c. To learn the purpose of processing the personal data and whether the data are used for the corresponding purposes,

ç) To get information on the third parties to whom the personal data are transferred in the country and abroad,

d. In case the personal data are processed incompletely or inaccurately, to request the correction,

e. To request that personal data are deleted or removed within the framework of the conditions stipulated in article 7,

- f. To request that the processes performed as per clause (d) and (e) are notified to the third parties to whom the personal data are transferred,
- g. To appeal to the negative results against himself/herself arising from the analysis of the data processed exclusively through the automatic systems,
- ğ) In case the personal data are damaged due to the processing of the data contrary to the Law, to request that the damages are indemnified.

Nevertheless, the persons don't reserve any right on the anonymized data within the company. (ŞAH SARAY OTEL) may share the personal data as required by a juridical function or governmental authority as per the business and contractual relationship.

The owners of the personal data shall submit their requests regarding the above-mentioned rights to the following contact address by completely filling out and putting their wet signatures on the application form given at <https://www.sahsaraycavesuites.com>, the official website of the company, through registered letter with return receipt with the copies of their identity cards (only front page for birth certificate). The applications shall be replied within the shortest time according to the content of the application ow within 30 days at the latest after the delivery to the company. You need to apply with registered letter with return receipt. Besides, only the questions about you shall be replied and any applications made regarding your spouse, relative or friends shall not be accepted. (ŞAH SARAY OTEL) can only request information and document from the application holders.

IX. Confidentiality Principle

The data of the employees and other persons within (ŞAH SARAY OTEL) are confidential. Nobody can use, copy, reproduce, transfer such data for other purposes apart from the business purposes.

X. Process Security

All necessary technical and administrative measures are taken to protect the personal data received by (ŞAH SARAY OTEL) and to prevent the retention of them by unauthorized persons and to prevent the damage on our customers and potential customers. Within this framework, it's ensured that the software complies with the standards, third parties are selected with care and data protection policy is followed within the company.

XI. Inspection

(ŞAH SARAY OTEL) carries out the internal and external inspections required for protection of the personal data.

XII. Notification of Violations

(ŞAH SARAY OTEL) shall immediately act to remedy the violations in case a violation of personal data is notified to it. It shall mitigate or indemnify the damage of the relevant person. In case the personal data are obtained by the unauthorized persons, this case shall be immediately notified to the Board of Personal Data Protection.

Regarding the notification of the violations, you can also make an application as per the procedures provided at <https://www.sahsaraycavesuites.com>

All applications regarding requests made pursuant to the Act on the Protection of Personal Data as announced on <https://www.sahsaraycavesuites.com> shall be put into process when the form on the websites is completed, a copy of your identity card is attached thereto, and sent to the address written on the form via registered mail.

The rights concerning personal data will only be used for one's own data. Requests regarding the personal data of others will not be taken into consideration. Forms without identity card photocopies will not be taken into consideration. Please be informed that even if data deletion requests are fulfilled, we are required to share data with official authorities if requested so by them.

XII Consent for Electronic Communication

By signature of this Confidentiality/Personal Data Protection Policy and Communication Consent, you hereby consent for collection, storage, process, use and transfer of your personal data you have consented to share with us for the purposes of providing and offering various advantages for you and conduct of any and all advertisement, sale, marketing, survey specifically for you and physical and electronic communication of similar purpose and sending of other communication messages. Your personal data will also be shared with all subsidiaries and affiliates of As well as 3rd parties in country and abroad having contractual relationship with us for the same purposes. In addition, such data shall also be shared only when needed and in the needed quantity with 3rd persons with whom we have contractual relationship and who are bound by same liabilities legally and technically as we are in respect to data protection and security and observing the relevant Legislation provisions in order to ensure perfect performance of services to be rendered specifically to you, ensure proper delivery of your potential shipments, in due time receipt of notices to be made by phone, sms, e-mail and other electronic communication means. The customers hereby agree and commit that they consent for use and storage of personal data byin this way. shall take all measures for safe storage of said personal data, prevention of unauthorized access and illegal data processing as stipulated under article 12 of Act on Protection of Personal data numbered 6698.

As customer by agreeing this Personal Data Protection Policy and Communication Consent, you hereby explicitly consent for processing of your location data processed by electronic communication operator and shared with us by it based on legal relationship between electronic communication operator and our company in order to provide and offer various advantages to you and make advertisement, sale, marketing, surveys specifically to you and any all other electronic communication for similar purpose and sending other communication messages. If you wish to withdraw your consent, you can submit your request to by the same method you have given consent (sms, e-mail, web site and other methods) whenever you request so.

Communication: You can contact us via following communication details in case of any questions about confidentiality agreement

(ŞAH SARAY OTEL)

AYDINLI-ORTA MAH. UZUNDERE/1 SK. NO: 1 İÇ

KAPI NO: Z1 GÖREME BELDESİ/ MERKEZ/

NEVŞEHİR

PHONE : +903842712134

MAIL : info@sahsaraysuites.com