

CORPORATE GENERAL CLARIFICATION TEXT ON THE PROCESSING OF PERSONAL DATA

As You Otelcilik Turizm Anonim Sirketi, we have prepared this clarification text in order to inform you, our Visitors, Online Visitors, Customers, Prospective Customers, Supplier Employees, and Supplier Authorities, regarding the processing, storage and transfer of your personal data within the framework of the Law No. 6698 on the Protection of Personal Data ("GDPR") and related legislation and activities arising from legal regulations.

1) What are the Categories of Personal Data Processed by us and for What Purposes Do We Process Them?

Your personal information may be processed by You Otelcilik Turizm Anonim Sirketi in accordance with the following principles stipulated in Article 4.2 of the GDPR, within the scope of our established and ongoing relationships with our business partners (*it is possible for data subject to fall into more than one category*) for the following purposes.

- (i) Lawfulness and fairness,
- (ii) Being accurate and kept up to date where necessary,
- (iii) Being processed for specified, explicit and legitimate purposes,
- (iv) Being relevant, limited and proportionate to the purposes for which they are processed,
- (v) Being retained for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed.

A. Our Visitors

Identity information of our visitors (*e.g. name, surname*), physical space security information (*e.g. camera recordings*) may be processed for the following purposes:

- a) Creation and monitoring of visitor records,
- b) Ensuring physical space security

B. Online Visitors

Operational security information (*e.g. your IP address information*), marketing information (*e.g. shopping history information, cookie logs*) and (*provided you have notified us**) identity information, contact information (*e.g. your e-mail address*) of our online visitors using our website may be processed in order to

- a) carry out activities in accordance with the legislation,
- b) carry out information security processes,
- c) monitor requests / complaints,
- d) carry out communication activities
- e) provide information to authorized persons, institutions and organizations,
- f) provide you with access to our website via the Internet

C. Customers

Identity information, contact information, customer transaction information (*e.g. order information*), physical space security information, legal transaction information, marketing information (*e.g. shopping history information*) of our customers, whether natural persons or

authorized persons and/or employees of the legal persons, may be processed for the purposes of:

- a) conducting activities in accordance with the legislation,
- b) conducting financial and accounting operations,
- c) execution/supervision of business activities,
- d) carrying out logistics activities,
- e) execution of after-sales support services for goods/services,
- f) execution of goods/service sales processes,
- g) conducting marketing analysis studies,
- h) execution of contract processes,
- i) providing information to authorized persons, institutions and organizations,
- j) ensuring physical space security,
- k) settlement of legal disputes,
- l) carrying out storage and archive activities,
- m) execution of risk management processes,
- n) execution of advertising/campaign/promotion processes, sending commercial electronic messages,
- o) execution of processes of commitment to the company/products/services,
- p) conducting communication activities.

D. Prospective Customers

Identity information, contact information, customer transaction information, physical space security information, marketing information of our prospective customers, whether natural persons or authorized persons and/or employees of the legal persons, may be processed for the purposes of:

- a) managing the sales processes of goods/services,
- b) execution of contract processes,
- c) ensuring physical space security,
- d) execution of advertising/campaign/promotion processes, sending commercial electronic messages,
- e) conducting marketing analysis studies.

E. Supplier Employees

Identity information, contact information, physical space security information, professional experience information (e.g. *on-the-job training information*) of our supplier employees may be processed for the purposes of:

- a) conducting communication activities,
- b) execution/supervision of business activities,

- c) ensuring physical space security,
- d) execution of supply chain management processes,
- e) conducting logistics activities,
- f) conducting activities in accordance with the legislation,
- g) conducting occupational health/safety activities.

F. Supplier Authorities

Identity information, contact information, physical space security information, customer transaction information, marketing information and legal transaction information of our supplier authorities, whether natural persons or authorized persons and/or employees of the legal persons, may be processed for the purposes of:

- a) execution/supervision of business activities,
- b) execution of goods/service procurement processes,
- c) conducting financial and accounting operations,
- d) execution of contract processes,
- e) execution of investment processes,
- f) ensuring physical space security,
- g) monitoring and execution of legal procedures.

2. What are the Methods of Collecting Your Personal Data?

Your personal data mentioned above in categories are collected through physical means such as order forms, contracts, visitor forms or through information systems and electronic devices (*e.g. telecommunication infrastructure, computers and telephones*) through our website and other documents declared by the data subject by automatic or non-automatic means.

3. What is the Legal Reason for Collecting Your Personal Data?

Your personal data may be processed by You Otelcilik Turizm Anonim Sirketi for the purposes specified in Article 5 of the GDPR in line with the realization of the purposes described above:

- (i) It is expressly provided for by the laws,
- (ii) Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract,
- (iii) It is necessary for compliance with a legal obligation to which the data controller is subject,
- (iv) Data processing is necessary for the establishment, exercise or protection of any right,
- (v) Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject,

(vi) Identity and communication data of our Customers and Prospective Customers may be processed for the purposes of advertising, campaigns, promotions and sending commercial electronic messages based on their explicit consent.

4. Do We Transfer Your Personal Data to a Third Party?

a) **Personal data of our visitors** may be shared with law enforcement and judicial authorities for the purpose of resolving legal disputes and upon request in accordance with the relevant legislation.

b) **Personal data of our online visitors** may be shared with judicial authorities and authorized public institutions and organizations for the purpose of resolving legal disputes and upon request in accordance with the relevant legislation.

c) **Personal data of our customers** may be transferred to authorized public institutions and organizations, IT company, suppliers, cargo companies, insurance companies, banks and our financial advisor in order to carry out activities in accordance with the legislation, to monitor and carry out legal procedures and to provide information to authorized persons, institutions and organizations within the scope stipulated by legal regulations. In addition, such personal data may be transferred to judicial authorities in legal disputes that may arise in the future.

d) **Personal data of our prospective customers** may be transferred to judicial authorities in legal disputes that may arise in the future.

e) **Personal data of our supplier employees** may be transferred to the IT companies, suppliers, cargo companies, banks and our financial advisor in order to carry out the activities in accordance with the legislation, to monitor and carry out legal procedures, and to provide information to authorized persons, institutions and organizations within the scope stipulated by the legal regulations. In addition, such personal data may be transferred to judicial authorities in legal disputes that may arise in the future.

f) **Personal data of our supplier authorities** may be transferred to authorized public institutions and organizations, IT company, suppliers, cargo companies, banks and our financial advisor in order to carry out activities in accordance with the legislation, to monitor and carry out legal procedures, to provide information to authorized persons, institutions and organizations within the scope stipulated by legal regulations and to conduct/supervise business activities. In addition, such personal data may be transferred to judicial authorities in legal disputes that may arise in the future.

5. Do We Transfer Your Personal Data Abroad?

As You Otelcilik Turizm Anonim Sirketi, we do not transfer your personal data abroad.

6. How Can You Exercise Your Rights Regarding Your Personal Data?

You can send us your requests within the scope of Article 11 of the GDPR regulating the rights of data subjects through the "Application Form to the Data Controller" prepared for your convenience in accordance with the "Communiqué on the Procedures and Principles of Application to the Data Controller" on the website of You Otelcilik Turizm Anonim Sirketi.

Data Controller: You Otelcilik Turizm Anonim Sirketi

Address: Akar Kuyu Caddesi No. 2 Kadriye Mh. Antalya

E-Mail: kvkk@thexbelek.com