# CONFIDENTIALITY/ PERSONAL DATA PROTECTION POLICY

Personal data protection is an important concept for Up Otelcilik Turizm Ltd. Şti. [“BeyEvi Alaçatı”]. In order to comply with Turkish Personal Data Protection Law no. 6698 [“KVK Law”], BeyEvi Alaçatı, adopts the principles foreseen by KVK Law, carious out liabilities regarding the processing, deletion, removal, making anonymization, transfer of personal data, enlightenment of the related person and maintenance of data safety. Confidentiality and Personal Data Protection Policy issued in this regard is brought to the attention of real persons [“Related Person”], and our website, corporate Office or hotel can also be visited with no sharing of any personal data. Personal data collected within the knowledge of visitors can be processed under the conditions stated in this policy in accordance with the relevant legislation.

# Scope and Aim of Confidentiality and Personal Data Protection Policy

This, Confidentiality and Personal Data Protection Policy hereby, explains BeyEvi Alaçatı’s;

* 1. Personal data collection methods and legal reasons,
  2. Processing of which group of people’s personal data (Data Owner Categorization)
  3. Processing of which categories of personal data with regard to this group of people (Data Categories), and sample data types,
  4. Usage of this personal data in which business processes and for what purposes,
  5. Technical and administrative measures taken to ensure the security of personal data,

1. Transferring of personal data to whom and for what purpose,
2. Personal data retention periods,
3. What the Related Persons’ rights on personal data are and how they can use these rights,
4. How Related Persons can change their positive or negative preferences in receiving electronic commercial messages

j. The sharing of personal data with public authorities.

# Personal Data Collection Methods and Legal Reasons

BeyEvi Alaçatı collects personal data by the related person himself, Contracts, suppliers, electronic mail, Corporate common areas, Corporate relevant departments, incoming notifications from administrative and judicial authorities and through and miscellaneous communication channels in aural, electronic or written form, in accordance with personal data processing conditions stated in KVK Law and in line with the legal reasons determined in this Confidentiality/Personal Data Protection Policy.

# Data Subject Person Group Categorization

BeyEvi Alaçatı categorizes as follows the data subject person groups whose personal data are processed in personal data processing courses and in activities related to these courses. Moreover in accordance with the personal data processing conditions stated in 5th and 6th articles of KVK Law and in line with the legal reasons determined in this Confidentiality/Personal Data Protection Policy, personal data of other person groups (supplier, vendor, advisor) can be processed.

* 1. Customer,
  2. Journal Works and Interview
  3. Supplier or Supplier’s Employee or Agent

# Data Categories and Sample Data Types

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| --- | --- | --- |
| 1. | **Journal Works/ Interview** |  |
| * **Contact data** | Address, Email, Company and position, Telephone Number |
| * **Identity data** | : Name surname |
| * **Personal Information** | : Educational status |
| 2. | **Suppliers or legal entity suppliers authorities from**  **whom service is received** |  |
| * **Financial Data** | Bank name / IBAN No, Signature Circular, Tax Number |
| * **Contact data** | Address, Email, Telephone Number |
| * **Identity data** | : Name, surname, Driver information / directory information, Transfer company vehicle information |
| 3. | **Customer Data** |  |
| * **Financial information** | Bank / Credit Card Information, IBAN / account number |
| * **Visual and Audial**   **Information** | : Photograph |
| * **Contact data** | Address, E-Mail, Phone Number |
| * **Identity data** | : contact information to call in emergency, Name, surname, Gender, guest list information, Lodging Information & preferences / Personal Information of the person lodged together with, passport information, TR ID number,  nationality, date of birth |
| * **Personal data** | Vehicle License Plate Number |
| * **Special Qualified Personal**   **data** | : Signature, camera image recording, Health Problems |
| * **Personal Information** | : Date of birth, Wedding Anniversary, Job title, Occupation |
| * **Travel Information** | : Lodging Information & preferences / Personal Information of the person lodged together with, Transport Information |
|  | * **Transaction Security**   **Information / Risk Management Information** | : Traffic information |
| * **Customer process data** | : Room number |

1. **Usage of this personal data in which business processes and for what purposes**

Personal data are used by hotels (BeyEvi Alaçatı) run by BeyEvi Alaçatı for;

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| --- |
| * Product and/or Service Procurement |
| * Product and/or Service Submission * Execution of contract, performing marketing and promotional   activities   * Offer collection, contract establishment, purchasing,   Procurement and the purpose of development of activities regarding all these processes. |

# Tehnical and administrative measures taken to ensure the security of personal data

Technical and administrative measures taken to ensure the security of personal data by BeyEvi Alaçatı are as follows:

* In order for the Data Security to be maintained authorization management is performed in systems that contain personal data. Accesses to these systems to be realized over the network are controlled.
* In the newly planned projects, during the design stage security requirements are determined for the maintenance of the data security. (Privacy by design)
* Activities and the transactions realized by users and visitors are logged.
* Security scans of all systems containing personal data are realized periodically.
* Necessary process and systems are fictionalized in order to prevent the personal data from being taken out of the institution illegally.
* Trainings are given to persons with access to personal data and their awareness is increased and rules to obstruct data violation cases are applied.
* Personal data are kept in data center and cloud platforms by taking necessary security

measures.

* Software and other products used for service encounter are expected to be compatible with information security and personal data protection.
* All systems containing data are backed up in order to be protected in case of a probable system breakdown and cyber-attacks and to maintain the work continuity.
* In order to protect information systems containing personal data against unauthorized accesses and illegal data processing, hash, coding, transaction record, access management and physical security measures are taken.
* Network on which website and all systems containing personal data are protected by firewall.
* All pages from which personal data over the website are obtained are protected by SSL

certificate.

# Transferring of personal data to whom and for what purpose,

BeyEvi Alaçatı transfers personal data to third persons merely in line with the purposes stated in Confidentiality and Personal Data Protection Policy and in accordance with 8th and 9th articles of KVK Law. In this regard, processed Customer data are shared with the relevant departments and if required, these data can be reached by in-company departments as well.

According to the customer’s commercial electronic prompt confirmation, customer data are also shared with commercial electronic prompt tool service provider in order to make introduction, advertisement, to provide benefit and opportunity in line with the customer’s preference, liking and habits.

Website user preferences and browser history are shared with third parties from whom cookie

service is received.

Customer data are shared with BeyEvi Alaçatı’s group companies within the concept of reporting and statistical works.

Personal data subject to domestic and foreign transferas mentioned above are protected legally too by the provisions compatible with KVK Law stated in our contracts by taking into consideration that the opposite party of the legal relationship is data supervisor or data process or besides technical measures that shall ensure their security.

# Personal Data Storage Duration

BeyEvi Alaçatı stores the personal data it processes for durations foreseen in the relevant legislation or required by processing purpose in accordance with KVK Law. In our Personal Data Storage and Destruction Policy these durations are approximately as follows:

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| --- | --- | --- |
| Information about Customer | As long as the contract period continues and after the end of the contract, with respect to the subject of the relevant contract, whichever is the longer limitation period under the law that governs the issue, the data is stored during that time. | Law No. 6098 |
| All records related to accounting and financial transactions | 10 years | Law No. 6102, Law  No. 213 |
| Cookies | See Cookie Policy |  |
| Commercial electronic prompt confirmation records | 1 year from the date of approval withdrawn | Law No.  6563 and related secondary legislation |
| Job applications  due to the information and / or CV received | Candidate running data is revised once a year and data of the candidates who have not become employees are deleted. |  |
| personal data related to suppliers | As long as the contract period continues and after the end of the contract, with respect to the subject of the relevant contract, whichever is the longer limitation period according to the law, the data is stored during that time. | Law No. 6102, Law  No. 6098  and Law No. 213 |

You may examine our Cookie Policy for the storage durations of personal data we obtained via

cookies.

# Profiling and Segmentation

You may examine our Cookie Policy for detailed information about the processing of personal data obtained via cookies found on BeyEvi Alaçatı website.

# What the Related Persons’ rights on personal data are and how they can use these rights

The rights Related Person has according to Article 11 of KVK Law on personal data processed by BeyEvi Alaçatı are as follows:

* Finding out whether or not their personal data has been processed,
* Requesting information relating thereto if personal data has been processed,
* Finding out the purpose of processing of personal data and whether or not they are used in accordance with their purposes,
* Knowing the third persons to whom their personal data are transferred domestically or abroad,
* Requesting the correction of their personal data in case they are processed incompletely or incorrectly,
* Requesting the deletion or removal of their personal data within the framework of conditions foreseen in article 7 of KVK Law,
* Requesting the notification of the transactions performed in accordance with paragraphs (d) and (e) to third persons their personal data are transferred to.
* Objecting the reveal of a result against the person himself by the analysis of the processed data via exclusive automatic systems,
* Requesting the recovery of loss in case of any loss incurred as a result of illegal

process of personal data.

In order to use the rights on personal data; it is possible to use this rights by making application via the methods stated in the “Application Form” that is issued according to Article 13 of KVK Law and appears on the website operated by BeyEvi Alaçatı.

# Personal Data Sharing with Public Authoritities

BeyEvi Alaçatı may share personal data processed by BeyEvi Alaçatı in order to execute its liability by law [in cases whenBeyEvi Alaçatı is liable to give legal or administrative notice or information for fight against crime, threat towards state and public safety and the like but not limited to] with public institutions and organizations authorized to request legally these data.

# Cookie Usage and Management

Our Cookie Policy may be examined for detailed information about the cookies used by BeyEvi Alaçatı, cookie types, storage durations and cookie management.

# Conditions for Deletion, Removal and Anonymization of Personal Data

BeyEvi Alaçatı stores the personal data it processes through its website in accordance with articles 7,17 of KVK Law and article 138 of Turkish Criminal Law and for the durations foreseen by the relevant laws and/or as a requirement of purpose of processing. And at the end of these durations, personal data shall be deleted, removed or anonymized in accordance with the provisions of Regulation About the Deletion, Removal or Anonymization of Personal Data.

Deletion of personal data by BeyEvi Alaçatı means the process of personal data being completely inaccessible by related users and reusable. BeyEvi Alaçatı forms access authorization and control matrix in user level and puts into practice. Takes necessary measures in order to realize deletion in the database.

Removal of personal data by BeyEvi Alaçatı means the process of personal data being completely inaccessible, unreturnable and non-reusable by anybody in any form.

Anonymization of personal data by BeyEvi Alaçatı states that personal data are rendered non-relatable to a real person whose identity is determined or determinable in any case even if personal data are matched with other data.

BeyEvi Alaçatı explains in detail the methods and technical and administrative measures it takes regarding the deletion, removal and anonymization within the scope of Personal Data Storage and Destruction Policy it prepared in accordance with Regulation About the Deletion, Removal or Anonymization of Personal Data. And in this Policy the time period for the periodical destruction foreseen in the Regulation is determined as 6 months.

# Amendments to be Made in Confidentiality/Personal Data Protection Policy

BeyEvi Alaçatı, without giving prior notice, may always make amendments in Confidentiality/Personal Data Protection Policy. These amendments enter into force immediately by the issuance of amended new Confidentiality/Personal Data Protection Policy.

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