

# **POLATDEMİR TURİZM TİCARET A.Ş. (LASAGRADA HOTEL ISTANBUL) LPPD POLICY FOR PROTECTION AND PROCESSING OF PERSONAL DATA**

## **INFORMATION FORM**

### **THE TITLE OF THE DOCUMENT**

Polatdemir Turizm Ticaret A.Ş. Policy for Protection and Processing of Personal Data

### **PREPARED BY**

Küçük & Küçük Law Office

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1.0

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The policy is prepared in Turkish, in the event of any discrepancy or inconsistency between the Turkish version and any other translated versions of this Policy the original Turkish version shall take precedence.

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As used in this Agreement, the following terms shall have the following meanings ascribed to them respectively:

|   |  |
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| <b>Explicit Consent</b>   | Shall mean a consent that is related to a specific issue, based on information and expressed with free will  |
| <b>Anonymization of personal data</b>   | Refers to a process by which personal data is irreversibly altered in such a way that a data subject can no longer be associated with an identified or identifiable real person in any way, even if the personal data is matched with other data   |
| <b>Personal Health Data</b>   | Refers to personal data related to the physical or mental health of an identified or identifiable real person including the provision of health care services, which reveal information about his or her health status   |
| <b>Personal Data</b>  | Refers to any information relating to an identified or identifiable natural person, for example, name-surname, Republic of Turkey ID No, e-mail, address, date of birth, credit card number, etc.  |
| <b>Processing of Personal Data</b>  | Refers to any type or kind of operation or set of operations which is performed upon personal data such as collection, recording, organization, storage, adaptation or alteration, disclosure, transmission, dissemination, retrieval, making available for use or collection, categorization or blocking its use, wholly or partly, whether through automatic means, or through non-automatic means or other means provided that they form part of a filing system; |
| <b>PPD Law</b>  | Shall mean Law no 6698 on the Protection of Personal Data  |
| <b>KVK Board</b>  | Shall mean Personal Data Protection Board  |
| <b>KVK Authority</b>  | Shall mean Personal Data Protection Authority  |
| <b>Sensitive or Special Category of Personal Data (Personal Data of Special Nature)</b> | Refers to personal data concerning race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, dressing style, appearance, membership to associations, foundations or trade unions, medical and health, sexual life, criminal convictions and offences and related security measures as well as personal biometric and genetic data;  |

|                                      |   |
|--------------------------------------|---|
| <b>TCK/(TPC)</b>                     | shall mean Turkish Penal Code no 5237   |
| <b>Data Processor</b>                | Shall mean a natural or legal person who processes personal data based on the authority granted by or on behalf of the data controller  |
| <b>Owner of Personal Data</b>        | Shall mean a natural person whose personal data is processed and who is defined as a “data subject “ in the PPD Law   |
| <b>Data Subject Application Form</b> | Shall mean the application form which is used by data subjects whose personal data are processed within Polatdemir Turizm Ticaret A.Ş. to submit their requests regarding exercising any of their rights enumerated in article 11 of the PPD Law. |
| <b>Data Controller</b>               | Shall mean a natural or legal person who is responsible for the determination of the purpose and means of the processing of personal information as well as for establishment and management of the data registry system                          |
| <b>Data Controllers’ Registry</b>    | Shall mean the data controllers’ registry maintained by the Authority under the supervision of the Personal Data Protection Board   |
| <b>Data Inventory</b>                | Shall mean an inventory prepared and detailed by Polatdemir Turizm Ticaret A.Ş. by way of associating its personal data processing activities with the processing purposes, data categories, recipient groups and data subject groups             |

## 1) PURPOSE

We, as Polatdemir Turizm Ticaret A.Ş., are well aware of our responsibility for the security and legal protection of personal data which is regulated as a constitutional right and we place a great importance on the confidentiality and security of your personal data processes within our Company.

The purpose of this policy is to set forth the methods and principles to be complied with to ensure that personal data is processed and protected by our Company in accordance and in compliance with the Law on the Protection of Personal Data (LPPD) published in the Official Gazette no 29677 of April 7,

2016. The principles and procedures adopted by our Company in carrying out the personal data processing activities within the framework of the Policy for the Protection and Processing of Personal Data ( the "Policy") and fundamental principles adopted for ensuring that the personal data processing activities carried out by our Company complies with the regulations and arrangements introduced by the Law no 6698 on the Protection of Personal Data (the "Law) constitute the fundamental elements of this Policy.

On the other hand, activities undertaken by our Company for the protection of our employees' personal data are managed and protected under the Policy on the Protection and Processing of the Personal Data of Polatdemir Turizm Ticaret A.Ş, Employees which has been drafted and developed in line with the principles and procedures of this Policy.

## 2) SCOPE

This Policy applies to all activities conducted by our Company regarding the processing and protection of personal data.

The scope of application of this Policy includes all personal data of our officers, customers and employees that are processed within the Company.

## 3) IMPLEMENTATION OF THE POLICY AND RULES

Our Company applies the requirements of its network data protection policy through this policy or otherwise by other means. The relevant provisions of the legislation in force shall take precedence during processing and protection of personal data. In the event of any discrepancy or inconsistency between the relevant provisions of the legislation and the provisions of this Policy, our Company accepts that the provisions of the legislation in effect shall prevail. This Policy has been designed and developed by configuring our Company's applications according to the rules and procedures introduced by the relevant legislation.

From time to time we may revise or modify this policy, which, has been designed and developed by our Company and that has entered into force on July 26, 2019, in whole in part, to reflect changes in applicable laws, regulations or practices or features of our products and services. In such case, this policy will be amended and updated and accordingly its effective data will also be updated. This policy is posted on the Company's corporate website ([www.lasagradahotel.com.tr](http://www.lasagradahotel.com.tr)) is made accessible to data subjects upon request.

## 4) OBLIGATIONS RELATING TO THE PROCESSING OF PERSONAL DATA

The fundamental principles listed below should have been adopted by our Company to ensure that personal data processing carried out by our Company complies with and will continue to comply with the relevant applicable legislation on the protection of personal data

### 4.1.1. Processing Personal Data in accordance with the law and rules of honesty

Polatdemir Turizm Ticaret A.Ş. has to carry out personal data processing activities in accordance and in compliance with the relevant applicable legislation on the protection of personal data, and in particular with the Constitution of the Republic of Turkey, with a special emphasis on the rules of honesty.

### 4.1.2. Ensuring the accuracy, relevancy and updatedness of the personal data for the purpose for which the personal data is to be processed

Polatdemir Turizm Ticaret A.Ş. has to ensure the accuracy, relevancy and updatedness of personal data that is processed by it and in this regard, should take all necessary administrative and technical measures and carry out all required processes.

### 4.1.3. Ensuring the personal data processed is relevant, adequate and proportionate to the purposes for which they are processed

Polatdemir Turizm Ticaret A.Ş. has to ensure the personal data it is processing is adequate to properly achieve the purposes for which it is processed and has a rational link to that purpose and limited to what is necessary. In this regard, the purpose of personal data processing should be specified before the processing starts. In this context, Polatdemir Turizm Ticaret A.Ş. has to take into account the fundamental rights of data subjects and its legitimate interests.

#### **4.1.4. Ensuring that the personal data is stored and retained as long as stipulated in the relevant applicable legislation or for a period of time that does not exceed the period of time required for the purposes for which it was collected**

Polatdemir Turizm Ticaret A.Ş. has to ensure that the personal data is stored and retained as long as stipulated in the relevant legislation or for a period that does not exceed the period of time required for the purposes for which it was collected. Accordingly, Polatdemir Turizm Ticaret A.Ş. has to adhere to the statutory time limits stipulated in article 138 of the Turkish Penal Code and in articles 4 and 7 of the Law on Protection of Personal Data. Polatdemir Turizm Ticaret A.Ş. has to delete, or dispose of or anonymize personal data upon expiration of the period of time provided for in the legislation or if the reasons for the processing of such personal data no longer exist.

## **5) ISSUES REGARDING THE PROTECTION OF PERSONAL DATA**

### **5.1. Obligation to register with the Data Controller's Registry '**

Polatdemir Turizm Ticaret A.Ş. has to be registered with the Data Controllers' Registry before starting to process data and within the deadline/time limit to be determined and announced by the Personal Data Protection Board. Data controllers shall provide the following information to register with the Data Controllers' Registry System

- (1) Identifying information including address of Polatdemir Turizm Ticaret A.Ş. as the Data Controller and its representative, if any;
- (2) The purpose of data processing;
- (3) Explanation about data subject group or groups and their data categories;
- (4) Recipient or recipient groups to which personal data may be transferred;
- (5) Personal data likely to be transferred abroad;
- (6) Measures taken for ensuring the security of personal data
- (7) The maximum period of time required for processing personal data for the purposes for which they are processed

### **5.2. Obligation to inform Data Subjects**

Polatdemir Turizm Ticaret A.Ş. has to inform the data subject while collecting the personal data with regard to the following matters:

- (1) Identifying information of Polatdemir Turizm Ticaret A.Ş. as the Data Controller and its representative, if any,
- (2) The purposes for which the personal data will be processed,
- (3) To whom and for which purposes the personal data may be transferred
- (4) Methods and legal grounds for collecting personal data,
- (5) The rights of data subjects
  - To learn whether his/her data has been processed;
  - To learn the purpose of processing his/her data and whether they are used in accordance with the purposes for which they are collected;
  - To request information about the persons to whom his/her data has been transferred
  - To request rectification in the event his/her personal data has been processed incompletely or inaccurately and to request notification of the same to the third parties to whom his/her personal data has been transferred
  - To object to any adverse outcome to the detriment of or against him/her resulting from analyzing his/her processed data exclusively by automated systems
  - To request compensation for his/her losses in the event he/she suffers or sustains any loss or damage due to the processing of data in violation of the law

In this regard, Polatdemir Turizm Ticaret A.Ş. has to determine and identify channels through which personal data are collected and during personal data collection process inform data subjects at information points located in these channels where texts of disclosure statements on the protection of personal data are made available and/or accessible to data subjects and processes to achieve this purpose should be designed and developed.

### **5.3. Obligation of ensuring the security of personal data**

Polatdemir Turizm Ticaret A.Ş. shall, acting with the awareness of the importance of ensuring the security of personal data in all material respects, take all necessary technical and organizational measures for providing an appropriate level of security to prevent unlawful processing of personal data, prevent unlawful and/or unauthorized access to personal data and to safeguard personal data, and in this regard, shall conduct or have conducted all necessary inspections and audits in accordance and in compliance with the provisions of article 12 of the PPD Law.

In this context, Polatdemir Turizm Ticaret A.Ş. has to design and develop systems aimed at ensuring that measures listed below are taken, and these systems should be continuously and periodically reviewed and inspected and if security risks and/or vulnerabilities are discovered then all required measures should be taken, without any delay to eliminate any such risk or vulnerability.

### **5.4. Obligation to comply with the Decisions of the Personal Data Protection Board**

Polatdemir Turizm Ticaret A.Ş. has to comply with the decisions made by the Personal Data Protection Board, which is the executive organ of the Personal Data Protection Authority and acting for the purpose of ensuring that personal data is processed in accordance with the fundamental rights and freedoms.

### **5.5. Obligation to respond to the application of the Data Subject**

Polatdemir Turizm Ticaret A.Ş. shall, acting in the capacity of a data controller, to respond to the requests of data subjects within the shortest time possible, but in any event not later than thirty days of receipt of the relevant application depending on the nature of the said request pursuant to article 13 of the Law on the Protection of Personal Data. Data Subjects shall convey their request regarding their personal data in accordance with the Communiqué on Principles and Procedures for Application to Data Controller.

### **5.6. Obligation to collect and transfer personal data in compliance with the relevant applicable law**

Pursuant to article 4 of the Law on the Protection of Personal Data, Polatdemir Turizm Ticaret A.Ş. has to process personal data in accordance and in compliance with the law and rules of honesty. In this context, activities involving the collection, use and transfer of personal data should be carried out in accordance with the law and in a fair, lawful and transparent manner.

### **5.7. Obligation to comply with the legal regulations and arrangements regarding the storage of Personal Data**

Pursuant to article 7 of the Law on the Protection of Personal Data, Polatdemir Turizm Ticaret A.Ş. has to design, develop and implement the required internal systems to enable the Company to delete, dispose of or anonymize personal data upon expiration of the period of time provided for in the legislation or if the reasons for the processing of such personal data no longer exist even if such personal data has been processed in accordance and in compliance with the law and rules of honesty

## **6) PROTECTION OF SPECIAL CATEGORY OF (SENSITIVE) PERSONAL DATA**

Polatdemir Turizm Ticaret A.Ş. carries out all necessary activities to ensure the security of the special category of (sensitive) personal data and takes technical and administrative measures of all types to conform to the legal requirements and adequate measures set forth by the Personal Data Protection



Board ensure that these data are processed in accordance with the applicable law and in a fair, lawful and transparent manner.

## **7) POLICY FOR PROCESSING OF PERSONAL DATA**

Polatdemir Turizm Ticaret A.Ş. provides data subjects with information about the relevant applicable laws on the protection of personal data and information security as well as the use and processing of their personal data. Polatdemir Turizm Ticaret A.Ş. conducts a periodic risk analysis to identify the categories of personal data and understand analyze what kind of the risks and vulnerabilities may emerge during the processing personal data and pursuant to article 12 of the PPDL, takes all necessary technical and administrative measures for providing an appropriate level of security to prevent unlawful processing of personal data, prevent unlawful and/or unauthorized access to personal data and to safeguard personal data, The main measures taken by Polatdemir Turizm Ticaret A.Ş. are listed below.

- All activities conducted by Polatdemir Turizm Ticaret A.Ş were analyzed in depth specific to each business unit and a process based personal data processing inventory was developed based on the resulting findings of this analysis. The high-risk areas of this inventory were determined and all necessary legal and technical measures are taken in a continuous and periodic manner.
- Personal data processing activities and operations carried out by Polatdemir Turizm Ticaret A.Ş. are supported by information security systems, other technical systems and legal methods.
- Skilled and qualified personnel are employed in technical areas involving complex issues that require specialist knowledge and experience.
- Provisions regarding confidentiality and data security for incorporation into Employment Contracts to be concluded with new recruitments of Polatdemir Turizm Ticaret A.Ş during the recruitment process and employees are requested to comply with these provisions. On the other hand, employees are continuously and periodically briefed, informed and trained about the relevant laws and legislation on the protection of personal data and measures to be taken in this regard. The roles and responsibilities of employee's were reviewed with regard to the protection of personal data and their job definitions were revised.
- Contracts and agreements concluded by Polatdemir Turizm Ticaret were reviewed and examined with regard to PPDL, and amendments and/or revisions which were deemed necessary were made.
- Technical measures are taken in compliance with technological developments and these measures are checked and controlled in a regular periodic manner, updated and renewed.
- Authorizations for access are limited and these authorizations are reviewed on a regular basis.
- Technical measures taken are reported to the relevant officer responsible for these measures in a continuous and regular manner, and issues that pose a risk are reviewed and relevant departments endeavor to develop technological solutions.
- Software programs and hardware involving anti-virus systems and firewalls are installed.
- Back-up programs are used for ensuring the safe storage of personal data.

## **8) TRANSFER OF PERSONAL DATA**

With regard to the transfer of personal data, Polatdemir Turizm Ticaret A.Ş. is under the obligation and responsibility to act in compliance with the relevant provisions set forth in the PPDL and decisions issued and legal arrangements and regulations introduced by the Personal Data Protection Board. Polatdemir Turizm Ticaret A.Ş. may not transfer to natural persons and legal entities personal data and special category of sensitive personal data without the explicit consent of the relevant data subject. However, personal data and special category of sensitive personal data may be transferred to

third parties even in the absence of the explicit consent of the relevant data subject under any one or more of the following circumstances:

- Activities involving transfer of personal data are expressly permitted by the relevant applicable laws
- In cases where the transfer of personal data by the Company is directly related or necessary for the construction, execution or performance of a contract;
- If it is necessary for compliance with a legal obligation to which our Company is subject
- Transfer of personal data by the Company in a limited manner to make such data public provided that such personal data was made public, personally by the relevant data subject
- If the transfer of personal data by the Company is mandatory for the establishment, exercise or protection of certain rights of the Company or data subject or third parties
- If the transfer of personal data is mandatory for the legitimate interest of the Company provided that this transfer does not violate the fundamental rights and freedoms of the data subject
- If it is necessary to protect the life or physical integrity of the data subject or another natural person where the data subject is physically or legally incapable of giving consent

### **8.1 Transfer of Personal Data within the Country**

Polatdemir Turizm Ticaret A.Ş. may transfer personal data to third parties and/or companies in Turkey in accordance and in compliance with the Law and relevant other legislation and taking all security measures as provided for in the applicable legislation as long as no contrary agreement, if any is reached by the Company and the data subject based on a contract signed between the parties and unless otherwise specified in the relevant Law or other relevant legislation.

### **8.2 Cross-Border Transfer of Personal Data**

Apart from transfer of data to third parties in Turkey, Polatdemir Turizm Ticaret A.Ş. may also transfer personal data abroad which has been processed in Turkey or that has been processed and stored outside Turkey including personal data processed by outsourced vendors in accordance and in compliance with the Law and relevant other legislation as mentioned above and taking all security measures as provided for in the applicable legislation as long as no contrary agreement, if any is reached by the Company and the data subject based on a contract signed between the parties and unless otherwise specified in the relevant Law or other relevant legislation

In exceptional circumstances where explicit consent of the data subject is not required for transfer of personal data as provided for in the PPDL, in addition to the requirements for processing and transfer of personal data without explicit consent, the availability of an adequate level of protection in the country where the personal data will be transferred shall constitute a requirement for the transfer of personal data. The Personal Data Protection Board shall determine whether adequate level of protection is provided, and in cases where it is determined that there is no adequate level of protection, data controllers both in Turkey and in the foreign country where the personal data will be transferred are required to represent and warrant, in writing, that they will provide an adequate level of protection and any such transfer is required to be authorized by the Personal Data Protection Board.

## **9) PERSONAL DATA PROTECTION ACTIVITIES WITHIN THE BUILDING FOR ENTRANCES AND WEBSITE VISITORS**

The activities and operations involving the processing of personal data in the premises and offices of Polatdemir Turizm Ticaret A.Ş. are carried out in accordance and in compliance with the Constitution, PPDL and other relevant legislation. To ensure the security, Polatdemir Turizm Ticaret A.Ş. monitors the corridors and interiors of offices in the buildings where business places and premises used, owned or leased by Polatdemir Turizm Ticaret A.Ş. by means of closed circuit camera/TV systems for surveillance and security purposes. Polatdemir Turizm Ticaret A.Ş. processes personal data using closed circuit camera/TV (CCTV) systems, access cards, gate entrance cards and access control and other entrance products recording identity details of visitors and guests in visitor/guest books to increase and enhance the quality and reliability of the services provided and to ensure the lives and property of the Company, data subjects and other persons and to protect the respective legitimate interests of those enumerated above. The purpose of the monitoring and surveillance activities carried out by Polatdemir Turizm Ticaret A.Ş. is limited to the purposes set forth in this Policy. To this end, the areas monitored, number of CCTVs, and the total monitoring time are only sufficient to meet the security needs and are limited to the purpose to be achieved. Areas and spaces which pose a risk of

interfering with an individual's privacy in a manner that goes beyond security purposes are not monitored. Polatdemir Turizm Ticaret A.Ş. takes all necessary technical and administrative measures in accordance with article 12 of LPPD. Footage, records and images recorded and stored digitally can be accessed by only a limited number of employees of Polatdemir Turizm Ticaret A.Ş. Employees who have access to these records are under the obligation to protect the confidentiality of the personal data based on a confidentiality agreement signed between them and the Company.

## **10) THE RIGHTS OF DATA SUBJECTS WHOSE PERSONAL DATA ARE PROCESSED BY OUR COMPANY.**

All natural persons whose personal data are processed by Polatdemir Turizm Ticaret A.Ş. are entitled to apply at [www.lasagradahotel.com](http://www.lasagradahotel.com).and

- ▶ Learn whether his/her personal data has been processed
- ▶ Request information as to the processing if his/her personal data has been processed
- ▶ Learn the purpose of processing of his/her personal data and whether it is used in conformity with the purposes for what they are collected
- ▶ Request information about third parties located within the country or abroad to whom his/her personal data has been transferred
- ▶ Request rectification in the event his/her personal data has been processed incompletely or inaccurately and to request notification of the same to the third parties to whom his/her personal data has been transferred
- ▶ request deletion or destruction of his/her personal data if the reasons requiring processing of such data no longer exist
- ▶ raise an objection to any adverse outcome to the detriment of or against him/her resulting from analyzing his/her processed data exclusively by automated systems;
- Request compensation for his/her losses in the event he/she suffers or sustains any loss or damage due to the processing of data in violation of the law

## **11) DELETION, DISPOSAL OF AND ANONYMIZING OF PERSONAL DATA BY OUR COMPANY**

Pursuant to article 138 of the Turkish Penal Code and article 7 of the PPDL, Polatdemir Turizm Ticaret A.Ş. has to delete, or dispose of or anonymize personal data upon expiration of the period of time provided for in the legislation or if the reasons for the processing of such personal data no longer exist either, ex officio or upon request of the relevant data subject even if such data has been processed in accordance with the provisions of the relevant Law.

On the other hand, Polatdemir Turizm Ticaret A.Ş. reserves the right to not comply with or refuse the request of the relevant data subject in cases where it entitled and/or is under the obligation to store and retain the personal data pursuant to the provisions of the relevant legislation. If personal data is processed via an unautomated method, provided that it is part of a data recording system, Polatdemir Turizm Ticaret A.Ş. uses a physical destruction system to destruct the personal data during deletion/disposal process in such a manner that the data is not reusable again.

Polatdemir Turizm Ticaret A.Ş. may anonymize the personal data when the reasons for processing personal data for which it is processed no longer exist.

## **12)THE EXERCISE OF DATA SUBJECTS OF THEIR RIGHTS.**

Data subjects may convey their requests regarding the exercise of their rights enumerated above, free of charge, by completing and signing the Application Form available at [www.lasagradahotel.com](http://www.lasagradahotel.com) and delivering or sending to Polatdemir Turizm Ticaret A.Ş. the Application Form together with the identity documents proving their identity through any of the methods set forth below or by means of any other methods determined by the Personal Data Protection Board. Data subjects may send one copy, with wet ink signature, of the form available at the link mentioned above through a notary public to our

office at Halaskargazi Caddesi No: 96 Osmanbey | Şişli | İstanbul or by sending the application form with subjects are required to provide the Company with a special power of attorney issued and certified by a notary public and given by the relevant data subject. In the event that a data subject submits to Polatdemir Turizm Ticaret A.Ş. a request regarding his/her rights as a data subject, Polatdemir Turizm Ticaret A.Ş. shall proceed, evaluate and conclude the request, free of charge, within the shortest time possible, but at most within thirty days following the receipt of the request depending upon the nature of the request. However, in cases where the requested transaction by the relevant data subject requires an additional cost, the relevant data subject shall be required to pay fees as specified in the tariff published by the Personal Data Protection Board. However, in cases where the application is filed due a fault attributable to the data controller such fee shall be repaid to the relevant data subject. Polatdemir Turizm Ticaret A.Ş. may require the relevant data subject to provide additional information to verify the identity of the applicant. Polatdemir Turizm Ticaret A.Ş. may pose questions to the relevant data subject with regard to his/her application to clarify the matters contained in the request.

In any of the following circumstances Polatdemir Turizm Ticaret A.Ş. may refuse the request of the applicant by showing a reason or cause.

- the personal data is anonymized through official statistics and processed for the purposes such as research, planning and statistics
- the personal data is processed for art, history, literature or scientific reasons or within the scope of freedom of expression, provided that such processing does not constitute a crime, violate the national defense, national security, public safety, public order, economic security, privacy of personal life or personal rights
- the personal data is processed within the scope of preventive, protective or intelligence activities performed by public bodies and institutions entrusted with the task and authority by law to ensure national defense, national security, public safety, public order or economic security;
- the personal data is processed by judicial or executive authorities in relation to investigations, prosecutions, adjudications or enforcement;
- the processing of the personal data is required to prevent crimes or for criminal investigation;
- Processing of personal data which was made public by the data subject;
- when the personal data processing is necessary to carry out inspection or regulation, or disciplinary investigation or prosecution by official and authorized institutions and entities and professional organizations or associations which have the nature of public institutions, based on authority and power granted by law;
- when processing is necessary to protect the economic and financial interests of the state in connection with budget, tax and financial issues;
- when the data owner's request might likely violate the rights and freedoms of other people
- when the request requires disproportionate effort;
- If the requested information is already publicly available.

### **13)CIRCUMSTANCES UNDER WHICH DATA SUBJECTS MAY NOT ASSERT THEIR RIGHTS..**

Pursuant to article 28 of the PPDL, data subjects may not assert their rights enumerated above under any of the following circumstances due to the fact that each of the following circumstances constitutes an exception under the PPDL

- the personal data is anonymized through official statistics and processed for the purposes such as research, planning and statistics
- the personal data is processed for art, history, literature or scientific reasons or within the scope of freedom of expression, provided that such processing does not constitute a crime, violate the national defense, national security, public safety, public order, economic security, privacy of personal life or personal rights
- Personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorized and assigned to maintain national defense, national security, public security, public order or economic security.

- Personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution and debt enforcement proceedings.

Pursuant to article 28/2 of the PPDL, data subjects may not assert their rights enumerated in article 9 under any of the following circumstances due to the fact that each of the following circumstances constitutes an exception under the PPDL, only with the exception the right to claim compensation for losses

- the processing of the personal data is required to prevent crimes or for criminal investigation;
- Processing of personal data which was made public by the data subject;
- when the personal data processing is necessary to carry out inspection or regulation, or disciplinary investigation or prosecution by official and authorized institutions and entities and professional organizations or associations which have the nature of public institutions, based on authority and power granted by law;
- when processing is necessary to protect the economic and financial interests of the state in connection with budget, tax and financial issues;

#### **14) OTHER MATTERS AND ISSUES**

In the event of any discrepancy or inconsistency between the relevant provisions of the legislation and the provisions of this Policy, the provisions of the legislation in effect and the provisions other relevant legislation shall prevail. This Policy which has been designed and developed by Polatdemir Turizm Ticaret A.Ş. has entered into force based on separate resolutions adopted by the Board of Directors of Polatdemir Turizm Ticaret A.Ş.

**Customer**

Natural person/legal entities who use/used services and products offered by our Company regardless of whether there is a contractual relationship with our Company.

|   |  |
|---|--|
| <b>Visitor</b>  | Natural persons/legal entities have entered the physical or visited websites of our companies for various purposes.  |
| <b>Employee</b>   | Natural persons who are employed by the Company covered under the Social Security system and work for the Company within the scope of the activities and operations of the Company   |
| <b>Third Party/Person</b>   | Third party real persons who have relations with the aforementioned parties for the purpose of ensuring the security of commercial transactions with our Company or protecting the rights and interests of the relevant parties or other persons who do not fall within the scope of this Policy and Polatdemir Turizm Ticaret Anonim Şirketi Employees Policy for the Protection and Processing Policy. |
| <b>Candidate Employee</b>   | Those who have applied to our company for a job through various channels, or those that have disclosed their data to our company by sending their C.V.   |
| <b>Shareholder/Shareholders Of our Company</b>  | Natural person shareholders of our Company (information relating to our shareholders are available in the relevant issues of the İstanbul Trade Registry Gazette)  |
| <b>Company Directors /Officers</b>  | Natural persons who are the members of the Company's Board of Directors and other authorized officers  |
| <b>Employees, Shareholders and Authorized Officers of the Organizations and Companies with which we collaborate</b> | Natural persons who have a relationship with or work for organizations and companies with which we have business relationships of any kind including their shareholders and authorized officers (including but not limited to business partners, suppliers)  |

### Ek-Kişisel Veri Sahipleri