POLATDEMİR TURİZM TİCARET A.Ş. (POLATDEMIR HOTEL)

DISCLOSURE STATEMENT ON PROCESSING PERSONAL DATA OF THE GUESTS AND VISITORS OF  POLATDEMİR TURİZM TİCARET A.Ş. (POLATDEMIR HOTEL)

1. **I.          DATA CONTROLLER**

Your personal data is considered sensitive by Polatdemir Turizm Ticaret A.Ş. (Polatdemir Hotel) (for the sake of brevity shall hereinafter be referred to as the “Company”) and therefore we show a particular sensitivity for the protection of your personal data. Therefore, any and all personal data belonging to all persons with whom the COMPANY has a relationship (including those benefiting from our products and services) shall be processed, stored and preserved in accordance with the Law no 6698 on Protection of Personal Data (for the sake of brevity shall hereinafter be referred to as the “LPPD”). We acting in the capacity of a “Data Controller” process your personal data within the framework of LPPD and relevant applicable legislation in accordance and in compliance with the legislation within the scope of this disclosure policy and the purposes set out below.

1. **II.           THE PURPOSE OF PROCESSING PERSONAL DATA**

Your personal data may be processed within the framework of the Law no 6698 on Protection of Personal Data  for the purposes of providing you with better services, and conducting studies to make you benefit from the products and services offered by the COMPANY, delivering various advantages to you, informing you about our  discounts, promotions and campaigns,  and for advertising and promotion of our products and services by sending you related information such as marketing and advertising materials and promotional communications,  understanding and analyzing  your usage trends, preferences, customer satisfaction levels and purchase  habits about the products and services provided and  offered by the COMPANY, ensuring the commercial and legal security of persons who have a  relationship with the COMPANY, and for creating,  formulating  and implementing the COMPANY’s commercial and business strategies and designing, planning and conducting human resources activities and for the provision of any kind of services of a similar nature.

1. **III.           TO WHOM AND FOR WHAT PURPOSES PROCESSED DATA MAY BE TRANSFERRED**

Your personal data that have been collected may be transferred to our business partners, suppliers, shareholders, affiliates, and legally competent public authorities and private natural persons and legal entities within the scope of the requirements and purposes for processing of personal data as provided for in LPPD for the achievement of the purposes set forth above and for allowing our relevant business units to perform necessary works and conduct studies to make you benefit from the products and services provided by the COMPANY and for customizing and recommending our products and services to our customers based on their usage trends, preferences, habits of use  and needs and requirements, ensuring the commercial and legal security of persons who have a  relationship with the COMPANY, and for creating,  formulating  and implementing the COMPANY’s commercial and business strategies and designing, planning and conducting human resources activities.

1. **IV.          THE METHOD OF COLLECTING PERSONAL DATA**

Your personal data collected through various channels (hotel, branches, internet, etc.) including without limitation in verbal or written form and/or electronic, magnetic or other media may be processed by the Company for the purposes set forth above.

By processing these personal data we intend to provide you with excellent customer services without sacrificing quality, to ensure that all notices (phone, SMS, e-mail, etc.) are received by the respective recipients in a timely manner and to provide information to the extent required on a contractual basis and/or by operation of law.

1. **V.           THE RIGHTS OF DATA SUBJECTS ENUMERATED UNDER ARTICLE 11 OF THE  LAW ON THE PROTECTION OF PERSONAL DATA**

In the event you submit a request regarding your rights as a data subject, in compliance with the methods specified in thisDisclosure Statement our Company shall proceed, evaluate and conclude your request, free of charge, within the shortest time possible, but at most within thirty days following the receipt of the request. However, in cases where the requested transaction requires an additional cost, please be advised that our Company will charge you a fee as specified in the tariff published by the Personal Data Protection Board. In this context, **under Article 11 of the Law no 6698 on the Protection of Personal Data** as a data subject (holder of personal data) you are entitled to;

1)     Learn whether your personal data have been processed

2)     Request information as to the processing if your personal data have been processed

3)     Learn the purpose of processing of your personal data and whether they are used in accordance with the purposes for what they are collected

4)     Request information about third parties located within the country or abroad to whom your personal data have been transferred

5)     Request rectification in the event your personal data have been processed incompletely or inaccurately and to request notification of the same to the third parties to whom your personal data have been transferred

6)     request  deletion or destruction of your personal data despite the fact that they have been processed in accordance with the Law no 6698 and other relevant applicable laws if the reasons requiring processing of such data no longer exist and in this context,  to request notification of the same to  the third parties to whom your personal data have been transferred

7)     raise an objection to any adverse outcome  to the detriment  of or against you resulting from analyzing your processed data exclusively by automated systems;

8)     Request compensation for your losses in the event you suffer or sustain any loss or damage due to the processing of data in violation of the law.

Pursuant to the 1st paragraph of article 13 of the LPPD you may convey to the COMPANY your request regarding exercising any of your rights enumerated above in written form or by means of any other methods determined by the Personal Data Protection Board.  Due to the fact that the Personal Data Protection Board has not yet determined a method for the submission of your requests you are required to submit your application to the COMPANY in written form pursuant to the relevant provisions of the LPPD.  In this context, the channels, methods and procedures to be used to submit to the COMPANY your application in written form pursuant to article 11 of the LPPD are set forth below.

You may submit your request stating the right or rights that you wish to exercise as provided for in article 11 of the LPPD by completing the form provided in [www.lasagradahotel.com](http://www.lasagradahotel.com/) and personally delivering a signed copy of this form to Halaskargazi Cad. No:96 Osmanbey Şişli – İstanbul or by sending it through  a notary public or through other methods as described in the LPPD or you may send the relevant form with secure electronic signature to [polatdemir@hs01.kep.tr](mailto:polatdemir@hs01.kep.tr) together with the identity documents proving your identity.