TAMARIS
PRIVACY AND PROTECTION OF PERSONAL DATA

1. OBJECTIVE AND SCOPE

This Privacy and Personal Data Protection Principles (“Principles,) regulate the principles accepted by Tamaris Turizm Anonim Şirketi ("TAMARİS", "Company" or "Data Controller") for the purpose of the protection of personal data and sets out the principles of personal data processing regarding the processing of personal data of Employee Candidate, Visitor, Customer, Prospective Customer, Supplier, Third Party, Online Visitor (“Contact Groups”) and aims to enlighten such groups of persons.

2. PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

As TAMARİS, we process your personal data as Data Controller within the framework of the following principles.

2.1 Processing In Accordance With Applicable Laws and Good Faith

The principles of legal regulations and general trust and good faith are complied with in the processing of your personal data.

2.2 Keeping Personal Data Accurate and Up to Date

Taking into account your legitimate interests, periodical checks and updates are made in order to ensure that the processed data is accurate and up-to-date and necessary measures are taken accordingly. Within this scope, systems for checking the accuracy of personal data and making the necessary corrections are established within TAMARIS.

2.3 Processing for Specific, Explicit and Legitimate Purposes

Your personal data is processed on the basis of clear, specific and legitimate data processing purposes.

2.4 Being Linked, Limited and Measured For The Purpose Of Processing

Your personal data is processed in a measured, relevant and limited manner in order to achieve the intended purpose (s), and the processing of personal data that is not or is not needed to achieve such purpose(s) is avoided.

2.5 Storing For The Time Required By The Relevant Regulations Or For The Purpose For Which The Same Is Processed

Your data is stored for the time required by the relevant regulations or for the purpose for which the same is processed In this context, firstly, it is determined whether the relevant legislation provides a period for storing personal data, and should a period is determined, personal data is kept for the time required for the purpose for which it was processed. Provided that the reasons for expiration or elimination of the expiry date are removed, and there is no legal reason to allow them to be processed for a longer period of time, your personal data shall be deleted, destroyed or anonymized according to TAMARIS 'Personal Data Storage and Destruction Policy.

3. CONDITIONS OF PROCESSING PERSONAL DATA

Your personal data is processed by TAMARİS in accordance with the following conditions.

3.1 Explicitly Stipulated By Applicable Relevant Laws

Your personal data may be processed if it is expressly required by relevant law(s) to process such personal data.

3.2 Failure to Obtain Explicit Consent of the Concerning Person Due To Actual Impossibility

Your personal data may be processed if it is compulsory to process the personal data of the person concerned or another person who is unable to disclose his / her consent due to the impossibility or whose consent cannot be validated.

3.3 Direct Interest In The Establishment Or Execution Of Agreement

Your personal data may be processed if it is necessary to process the personal data of the parties to an Agreement, provided that it is directly related to the establishment or performance of such Agreement.

3.4 Fulfilment of Legal Obligations of TAMARIS

Your personal data may be processed if processing is mandatory to fulfil legal obligations as a data controller.

3.5 Publication of Personal Data

Should your personal data is publicized by you, it may be processed.

3.6 Data Processing Required for the Establishment or Protection of a Right

Your personal data may be processed if it is necessary to process data for the establishment, use or protection of a right.

3.7 Processing of Data Based on Legitimate Interests

Should it is deemed as necessary to process data for the legitimate interests of TAMARIS, your personal data may be processed.

3.8 Processing on Explicit Consent Granted

Should your personal data cannot be processed on the basis of any of the conditions set forth in these Principles, your personal data shall be processed based upon an explicit consent granted.

4. CATEGORIZATION OF PERSONAL DATA

Data Owner	Data Category	Data Types
Customer	**ID**	Name-Surname, Turkish ID Number, Identity Information, Signature Information, Photograph, Passport Information
	Physical Space Security Certificate	CCTV Camera Recordings
	Financial Information	Account Information, Billing Information, Credit Card Information
	Transaction Security	IP Address, Website Login, Logout and Navigation Information, Password and Password Information
	Health information	Health Data
	Communication	Address (workplace), E-mail, Phone / Mobile Phone
Employee Candidate	**ID**	Name-Surname, Identity Information, Gender, Date of Birth, Family Background, Marital Status
	Communication	Address, E-mail, Phone / Mobile Phone
	Visual Information	Photograph, CCTV Camera Recordings
	Health information	Disability Information, Health Information
	Resume	Curriculum Vitae, Professional Experience, Education, Foreign Language, Driving License
	Transaction Security	IP Address, Website Login, Logout and Navigation Information, Password and Password Information
Prospective Customer	**ID**	Name-Surname, Turkish ID Number, Identity Information, Signature Information
	Health information	Health information
	Financial Information	Credit Card Details

	Communication	Address (workplace), E-mail, Mobile Phone
	Social Media Information	Social Media Account Information
	Transaction Security	IP Address, Website Login, Logout and Navigation Information, Password and Password Information
Visitor	**ID**	Name-Surname, Identity Information, CCTV Camera Records
	Transaction Security	IP Address, Website Login, Logout and Navigation Information
Third Person	**ID**	Name-Surname
	Communication	Address (workplace), E-mail, Mobile Phone
	Transaction Security	IP Address, Website Login, Logout and Navigation Information
Supplier/Business Partner	**ID**	Name-Surname, Turkish ID Number, Identity Information, Signature Information
	Physical Space Security Information	CCTV Camera Recordings
	Personal Information	SSI Details, ISG Details
	Health information	Health information
	Communication	Address (workplace), E-mail, Mobile Phone
	Criminal Conviction and Security Measures	Criminal Record Information
	Audio / Visual Information	Voice recording
	Financial Information	Account Details
	Transaction Security	IP Address, Website Login, Logout and Navigation Information
Online Visitor	**ID**	Name-Surname
	Transaction Security	IP Address, Website Login, Logout and Navigation Information

5 PURPOSE OF PERSONAL DATA PROCESSING

In accordance with the personal data processing conditions specified in Articles 5 and 6 of Law No. 6698, personal data can be processed in TAMARIS for the following purposes according to the group of persons concerned.

5.1 CUSTOMER

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, Customer personal data may be processed for the purpose of the necessary business and operational processes, the execution of the contract, the follow-up of financial and accounting affairs, the planning and execution of customer relationship management and customer satisfaction activities processes, the follow up of contract processes and customer demands and complaints, the planning and execution of transfer processes, the planning of information security processes,

structure and management and audit and execution purposes in order for such customer(s) to benefit from product and services provided by the Company. .

5.2 EMPLOYEE CANDIDATE

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, personal data of an Employee Candidate shall be processed for the purposes of personal data, planning and execution of human resources processes, execution of personal activities, fulfilment of obligations arising from legislation, planning and execution of benefits, and execution of personnel procurement processes.

5.3 PROSPECTIVE CUSTOMER

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, Prospective Customer Data may be processed for purposes such as planning and execution of the activities necessary for the products and services offered by the Company to be offered to the relevant persons by being privatized according to their tastes, usage habits and needs of the concerned persons as well as carrying out necessary works and related business processes to enable such concerned persons to benefit from such services, and to plan and execute the activities required for the privatization and promotion of the products and services offered by the Company, and to plan and execute the customer relationship management processes.

5.4 VISITOR

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, personal data of visitors may be processed for the purpose of security of buildings and facilities and/or facilities, creation and follow-up of visitor records, security of fixtures and/or resources, security of technical and commercial work, security of corporate operations, provision of information to the competent authorities and institutions.

5.5 THIRD PARTIES

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, third party data may be processed for the purposes of carrying out the necessary business and operational processes in order to enable such third parties to benefit from the products and services offered by the company, as well as of carrying out the necessary works for conducting the commercial activities performed by the Company and conduct the business processes related to it, including carrying out necessary works and related business processes to enable such third parties to benefit from the products and services offered by the Company, and offering and promotion of the products and services by the Company through customisation, including the execution of the agreement..

5.6 SUPPLIER / BUSINESS PARTNER

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, supplier/business partner data may be processed for the purposes of carrying out the necessary business and operational processes in order to enable such third parties to benefit from the products and services offered by the company, as well as of carrying out the necessary works for conducting the commercial activities performed by the Company and conduct the business processes related to it, including carrying out necessary works and related business processes to enable such third parties to benefit from the products and services offered by the Company.

5.7 ONLINE VISITOR

In accordance with the personal data processing conditions specified in Articles 5 and 6 of the Law no. 6698, online Visitor personal data may be processed for the purposes of conducting marketing analysis studies, conducting advertising / campaign / promotion processes, conducting

communication activities, conducting product and services development works, and fulfilling legal obligations.

6 TRANSFER OF PERSONAL DATA

Your personal data shall be limitedly transferred to our main non-resident shareholder (ACCOR SA), our domestic and international resident affiliates, our domestic and international resident partners, companies that TAMARIS has commercial relations such as franchise, hotel management consultancy, hotel management and to those legally authorized private persons under the. scope of such principles and to the principles and purposes of Articles 3 and 5 and the personal data processing conditions and purposes set out in Articles 8 and 9 of Law No. 6698.

7 THE METHOD OF AND LEGAL REASON FOR PERSONAL DATA COLLECTION

Your personal data transmitted to TAMARIS electronically is processed according to the groups of people as follows.

7.1 CUSTOMER

Provided that it is directly related to the establishment or performance of an agreement personal data of the customers are processed in physical and electronic media by means of written or verbal data transfer tools, which are taken automatically from the person or third party as part of the data recording system based upon legal grounds as stipulated in Article 5 of Law No. 6698, which are namely, “processing requirement of personal data of the parties to the agreement”, “required in order for the data controller to meet their legal obligations”, “processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned”.

7.2 EMPLOYEE CANDIDATE

Personal data of employee candidate are processed in physical and electronic media by means of written or verbal data transfer tools, which are taken automatically from the person or third party by filling out an application form in electronic environment, or a physical application as a part of the data recording system based upon a prospective employment agreement and those legal grounds as stipulated in Article 5 of Law No. 6698, which are namely, “processing requirement of personal data of the parties to the agreement, “required in order for the data controller to meet their legal obligations”, “processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned”

7.3 PROSPECTIVE CUSTOMER

Personal data of prospective customers are processed in physical and electronic media by means of written or verbal data transfer tools, which are taken automatically from the person or third party as part of the data recording system based upon legal grounds as stipulated in Article 5 of Law No. 6698, which are namely, "have been publicized by the person concerned, "requirement of data processing for the establishment, use or protection of a right", "processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned” and “required in order for the data controller to meet their legal obligations”.

7.3 VISITOR

Personal data of visitors are processed by means of security cameras located in the service area, entrance doors, outside of the building, meeting rooms and activity areas, dining areas, cafeteria, entrance waiting area, car parking area, elevators and floor corridors of our service building based upon legal grounds as stipulated in Article 5 of Law No. 6698, which are namely, “required in order for the data controller to meet their legal obligations” and "processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned”.

7.4 THIRD PARTIES

Personal data of third parties are processed in physical and electronic media by means of written or verbal data transfer tools, which are taken automatically from the person or third party as part of the data recording system based upon legal grounds as stipulated in Article 5 of Law No. 6698, which are namely, "processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned" and those personal data processing conditions specified in Article 6. .

7.5 SUPPLIER / BUSINESS PARTNER

Provided that it is directly related to the establishment or performance of an agreement personal data of supplier/business partners are processed in physical and electronic media by means of written or verbal data transfer tools, which are taken automatically from the person or third party as part of the data recording system based upon legal grounds as stipulated in Article 5 of Law No. 6698, which are namely, "processing requirement of personal data of the parties to the agreement", "required in order for the data controller to meet their legal obligations", "processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned".

7.6 ONLINE VISITOR

Personal data of online visitors are processed automatically based upon those legal grounds as stipulated in Law No. 5651 on the Regulation of the Publications Made on the Internet and Fighting Against Crimes Committed by These Publications and Article 5 of the Law No: 6698, which are namely, "processing requirement of data in order for the data controller to meet their legal obligations", "processing requirement of data for the legitimate interests of the data controller, without prejudice to the fundamental rights and freedoms of the person concerned".

8 SECURITY OF PERSONAL DATA

8.1 To ensure the security of personal data and to prevent unlawful processing, TAMARIS takes reasonable measures to prevent unauthorized access risks, accidental data loss, intentional deletion or damage to data.

8.2 All kinds of technical and physical precautions are taken to prevent access of personal data to persons from authorized persons. In this context, especially the authorization system is designed in such a way that no one will be able to access such personal data more than necessary.

8.3 TAMARİS carries out and has the necessary audits carried out in its own company or organization in order to ensure the implementation of the provisions of Law No. 6698.

9 THIRD PARTY COMMITMENTS RELATED TO PERSONAL DATA

The personal information of the third parties, transmitted by the Group of Persons, can be processed by TAMARIS and it is hereby accepted by the Group of Persons and they grant their consent. The Group of Persons concerned also undertakes to provide the necessary information and to obtain the necessary permissions for the transmitted persons and their information in accordance with the Law No. 6698 on the Protection of Personal Data. Otherwise, the damages to be incurred shall remain with the Group of Persons concerned.

10 PROCEDURES AND PRINCIPLES OF APPLICATION

Should you have any requests regarding your rights stipulated under Clause 11 of Law No. 6689 as a concerning person, You may submit your application meeting the minimum requirement as defined in Communiqué on Procedures and Principles of Application to the Data Controller to tamaristurizm@hs03.kep.tr web address; to kisisel.veri@accor.com e-mail address through registered

electronic mail (KEP); through a notification submitted by a mobil signature or e-signature or by applying in person at Kazlıçeşme Mah. Kennedy Cd. No: 56 34020 Zeytinburnu/İstanbul address with the said form or with a written application with a wet-ink signature or through a notary public. In this context, you have the following rights as the person concerned;

a) To learn whether personal data is processed or not,

b) To Request information if personal data has been processed,

c) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,

d) To be informed of the third parties to whom personal data is transferred at home or abroad,

e) To request correction of personal data in case of incomplete or incorrect processing,

f) To request the deletion or destruction of personal data in accordance with the conditions provided for in Article 7 of the Law,

g) To request the notification of the transactions carried out in accordance with paragraphs (d) and (e) to the third parties to whom the personal data are transferred,

h) To object to the occurrence of a result against the person by analyzing the processed data exclusively through automated systems,

j) To demand the loss of the personal data in case of damage due to unlawful processing of personal data.