

EGE TURİZM VE GAYRİMENKUL YATIRIMLARI A.Ş.
PROTECTION OF PERSONAL DATA PROTECTION POLICY

This policy explains the principles governing the processing of personal data to inform the users of the website <https://bonusparkorman.com.tr/> owned by Ege Turizm Ve Gayrimenkul Yatırımları Anonim Şirketi (“Company”).

The protection of personal data is one of the top priorities of our Company. This Personal Data Protection and Processing Policy (“**Policy**”) sets out, the principles adopted by our Company in carrying out personal data processing activities and the fundamental principles ensuring compliance with the regulations set forth in Law No. 6698 on the Protection of Personal Data (“**KVK Law**” or “**Law**”). Furthermore, it provides comprehensive information regarding all personal data processing activities conducted by our Company, ensuring that relevant individuals are informed and transparency is maintained. With full awareness of our responsibility in this regard, your personal data is processed and protected in accordance with this Policy.

This Policy applies to all personal data processed by the Company through automated means or non-automated means, provided that the data forms part of a data recording system, excluding the personal data of our employees.

I. Definitions

Within the scope of this Policy;

- **Authority:** The Personal Data Protection Authority.
- **Anonymized Data:** Is personal data that does not relate to an identified or identifiable natural person in such a manner that the data subject is not or no longer identifiable.
- **Board:** The Personal Data Protection Board.
- **Data Processor:** A natural or legal person who processes personal data on behalf of the data controller based on its authorization.
- **Data Controller:** A natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.
- **Doğuş Hospitality:** Ege Turizm Ve Gayrimenkul Yatırımları A.Ş., the owner of the website.
- **Data Subject:** The natural person whose personal data is processed.
- **Explicit Consent:** Is consent that is freely given, specific, informed and unambiguous.
- **Law No. 5651:** The Law on the Regulation of Publications on the Internet and the Fight Against Crimes Committed Through These Publications.
- **Law No. 6698 / KVKK:** The Personal Data Protection Law.
- **Personal Data:** Any information related to an identified or identifiable natural person. Therefore, information concerning legal entities is not covered under the Law.
- **Processing of Personal Data:** Any operation performed on personal data, whether wholly or partially automated or by non-automated means as part of a data recording system, including but not limited to collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or prevention of use.
- **Recording Medium:** Any environment in which personal data is processed, whether wholly or partially automated, or processed by non-automated means as part of a data recording system.
- **Sensitive Personal Data:** Data relating to genetic, biometric and health data, as well as personal data revealing racial and ethnic origin, political opinions, philosophical beliefs, religious, sect, or other beliefs, clothing, membership in associations, foundations, or trade unions, sexual life, criminal convictions, and security measures.
- **Website:** Refers to <https://bonusparkorman.com.tr/>.

II. Scope and Purpose of the Privacy and Personal Data Protection Policy

This **Privacy and Personal Data Protection Policy** explains:

- a. Methods and legal grounds for collecting personal data,
- b. Categories of individuals whose personal data is processed ("**Data Subject Group Categorization**"),
- c. Categories of personal data processed for these data subject groups ("**Data Categories**") and examples of data types,
- d. The business processes in which these personal data are used and their purposes,
- e. The technical and administrative measures taken to ensure the security of personal data,
- f. The recipients and purposes of personal data transfers,
- g. The retention periods of personal data,
- h. The rights of **Data Subjects** over their personal data and how they can exercise these rights,

III. Matters Related to the Protection of Personal Data

ENSURING THE SECURITY OF PERSONAL DATA

In accordance with Article 12 of the Law, our Company takes necessary measures, in line with the nature of personal data, to prevent unlawful processing, access, transfer, or any other security vulnerabilities, and to ensure its safekeeping. In this regard, our Company implements administrative measures and conducts or commissions audits to ensure the appropriate level of security, pursuant to the guidelines published by the Board.

PROTECTION OF SENSITIVE PERSONAL DATA

Personal data that carries a higher risk of causing harm or discrimination if processed unlawfully is granted special importance under the Law. Pursuant to Article 6 of the Law, sensitive personal data includes:

- Race,
- Ethnic origin,
- Political opinions,
- Philosophical beliefs,
- Religion, sect, or other beliefs,
- Appearance and attire,
- Membership in associations, foundations, or trade unions,
- Criminal convictions and security measures,
- Biometric and genetic data,
- Health and sexual life data.

Our Company ensures that the technical and administrative measures adopted for the protection of personal data complies with the **adequate precautions outlined in the Board's Decision No. 2018/10 dated 31/01/2018** regarding the Processing and Security of Sensitive Personal Data. The implementation of these measures are monitored and audited within our Company.

Detailed information regarding the processing of sensitive personal data is provided in **Section 3.3** of this Policy.

INCREASING AWARENESS AND AUDITING OF BUSINESS UNITS REGARDING THE PROTECTION AND PROCESSING OF PERSONAL DATA

Our Company organizes training programs for business units to raise awareness to prevent unlawful processing of personal data, unauthorized access, and to ensure data security. The training programs and awareness activities are structured in accordance with the "Personal Data Security Guide" published by the Board on its official website. The purpose of the training programs and awareness activities is to ensure that personal data processing activities carried out by employees during the course of their duties complies with the Law and secondary regulations.

To establish and maintain awareness of personal data protection among both existing and newly recruited employees, our Company implements the necessary systems and, if needed, consults with external experts. In this regard, our Company evaluates participation in relevant training programs, seminars, and information sessions and organizes new training programs in line with updates in the applicable legislation.

IV. Matters Related to the Processing of Personal Data

PROCESSING OF PERSONAL DATA IN COMPLIANCE WITH PRINCIPLES SET FORTH IN THE LEGISLATION

- **Processing in Compliance with the Law and the Principle of Good Faith**
Personal data is processed in a manner that does not infringe individuals' fundamental rights and freedoms, adhering to the general principle of trust and good faith. In this context, personal data is processed to the extent necessary for the purposes of our Company's business activities.
- **Ensuring the Accuracy and Updating of Personal Data When Necessary**
Our Company takes the necessary measures to ensure that personal data remains accurate and up-to-date throughout the processing period. Mechanisms are established to periodically verify and maintain the accuracy and present status of personal data.
- **Processing for Specific, Explicit, and Legitimate Purposes**
Our Company clearly defines the purposes for which personal data is processed and processes such data only within the scope of legitimate purposes related to its business activities.
- **Processing Data in a Manner that is Relevant, Limited, and Proportionate to the Purpose**
Our Company collects personal data only to the extent necessary for its business activities and processes it strictly for the designated purposes.
- **Retention Period Prescribed in Relevant Legislation or Required for Processing Purposes**
Our Company retains personal data for the duration necessary for processing purposes and for the minimum retention period prescribed by applicable laws and regulations. Accordingly, our Company first determines whether a retention period is specified in the relevant legislation and, if so, complies with that period. If no legal retention period is stipulated, personal data is stored only for as long as necessary for processing purposes. Once the retention period expires, personal data is securely destroyed at the end of the designated periodic destruction intervals or upon the request of the data subject, using applicable data destruction methods (deletion, destruction, or anonymization).

CONDITIONS FOR PROCESSING PERSONAL DATA

Apart from obtaining explicit consent from the data subject, the legal basis for processing personal data may be based on one or more of the conditions specified below. If the processed data qualifies as sensitive personal data, the conditions outlined in Section 3.3 ("Processing of Sensitive Personal Data") of this Policy shall apply.

(i) Presence of the Data Subject's Explicit Consent

One of the conditions for processing personal data is obtaining explicit consent from the data subject. The explicit consent of the data subject must be provided for a specific matter, be based on adequate information, and given freely.

In the presence of the following conditions for processing personal data, personal data may be processed without the explicit consent of the data subject.

(ii) Explicitly Prescribed by Law

If the processing of personal data is explicitly prescribed by law, meaning that there is a clear provision in the relevant legislation regarding the processing of personal data, this condition shall be deemed to exist.

(iii) Inability to Obtain the Data Subject's Consent Due to Actual Impossibility

If obtaining explicit consent from the data subject is not feasible due to actual impossibility—such as when the data subject is unable to express consent or when consent lacks legal recognition—personal data may be processed if it is necessary to protect the life or physical integrity of the data subject or another person.

(iv) Necessity for Contractual Establishment or Performance

The processing of personal data is permitted when it is necessary for the conclusion or performance of a contract in which the data subject is a party.

(v) Compliance with the Company's Legal Obligations

Personal data may be processed if it is mandatory for the Company to fulfill its legal obligations.

(vi) Public Disclosure of Personal Data by the Data Subject

If the data subject has publicly disclosed their personal data, such data may only be processed for the purpose for which it was made public.

(vii) Necessity for the Establishment, Exercise, or Protection of a Right

Personal data may be processed if it is necessary for the establishment, exercise, or protection of a legal right.

(viii) Necessity for Processing in Pursuit of the Company's Legitimate Interests

Personal data may be processed if it is necessary for the legitimate interests of the Company, provided that such processing does not harm the fundamental rights and freedoms of the data subject.

PROCESSING OF SENSITIVE PERSONAL DATA

Sensitive personal data is processed by our Company in accordance with the principles set forth in this Policy, with the necessary administrative and technical measures taken, and under the following conditions:

(i) Presence of the Data Subject's Explicit Consent

One of the conditions for processing sensitive personal data is to obtain explicit consent from the data subject. Explicit consent must be given for a specific matter, based on adequate information, and is given freely.

(ii) Explicitly Prescribed by Law

If processing sensitive personal data is explicitly prescribed by law, meaning that there is a clear provision in the relevant legislation regarding the processing of such data, this condition shall be deemed fulfilled.

(iii) Inability to Obtain the Data Subject's Consent Due to Actual Impossibility

If obtaining the explicit consent of the data subject is not feasible due to actual impossibility—such as when the data subject is unable to express consent or when consent lacks legal recognition—personal data may be processed if it is necessary to protect the life or physical integrity of the data subject or another person.

(iv) Disclosure of Personal Data by the Data Subject

If the data subject has publicly disclosed their personal data public, such data may be processed only for the purpose for which it was made public.

(v) Necessity for the Establishment, Exercise, or Protection of a Right

Personal data may be processed if it is necessary for the establishment, exercise, or protection of a legal right.

(vi) Necessity for the Protection of Public Health

Personal data may be processed by persons or authorized institutions and organizations, under a confidentiality obligation, if it is necessary for the protection of public health, preventive medicine, medical

diagnosis, treatment, and care services, as well as the planning, management, and financing of healthcare services.

(vii) Necessity for Compliance with Legal Obligations

Personal data may be processed if it is necessary for fulfilling legal obligations in the areas of employment, occupational health and safety, social security, social services, and social assistance.

(viii) Processing by Foundations, Associations, and Other Non-Profit Organizations

If personal data is processed by foundations, associations, or other non-profit organizations established for political, philosophical, religious, or trade union purposes—provided that it is in compliance with the relevant legislation, limited to their field of activity, and not disclosed to third parties—such data may be processed in relation to their existing or former members, affiliates, or persons who regularly engage with these organizations.

INFORMATION OF THE DATA SUBJECT

In accordance with Article 11 of the Law and secondary regulations, our Company as the data controller, ensures transparency by informing data subjects at the time of data collection. This includes details such as the purposes of the processing, with whom it is shared for those purposes, the methods used to collect it, its legal basis, and the rights that data subjects have in relation to the processing of their personal data.

V. Collection and Processing of Personal Data

1. Processing of Personal Data of Website Users (Online Visitors) and Call Centre Users

1.1. Processing of Personal Data of Website Users (Online Visitors)

When users visit <https://bonusparkorman.com.tr/> and complete the “Contact” form, they may provide their personal information, such as first name, last name, email address, phone number, gender, date of birth, address, message, industry, and the subject of the form. Users acknowledge that they are providing their personal data voluntarily and for the purpose of submitting requests or suggestions. They agree that these data are collected solely for the purpose of evaluating the requests and suggestions they submit.

Additionally, traffic data of website visitors are processed in accordance with Law No. 5651.

1.2. Processing of Personal Data of Call Centre Users

Doğuş Hospitality collects and stores the personal data of users calling the call centre, which is handled by the call centre company with whom Doğuş Hospitality has a contractual relationship. The call centre company shares the same legal and technical responsibilities as Doğuş Hospitality regarding data protection and security and adheres to the relevant legal regulations.

Personal data, such as the caller's first name, last name, phone number, and email address, are collected during the call. Such data is processed for the purposes of providing the products and services offered by our company, customizing and recommending products and services based on the users' preferences, usage habits, and needs, planning and executing necessary activities for the promotion and customization of products and services, carrying out the required tasks for the relevant business units involved in the company's commercial activities, ensuring the security of the company's and its business partners' legal, strategic, and commercial interests.

The personal data shared during the call is collected for the purpose of processing requests, suggestions, and complaints, providing information about the outcome of these processes, and improving the services and products offered, and are stored by the call centre company.

VI. Data Categories and Sample Data Types

1. Online Visitors

- **Transaction Security Information:** IP address information, website login/logoff information.

- **Legal Transaction and Compliance Information:** Start and end time of the service provided, type of service utilized, amount of data transferred.
2. **Website Users**
- **Identity Information:** First name, last name.
 - **Contact Information:** Email address.
 - **Marketing Information:** Information obtained through advertisements, promotions, surveys, and campaign activities.

VII. Security, Transfer, and Exercise of Rights Regarding Your Personal Data

Doğuş Hospitality is committed to taking all necessary technical and administrative measures to ensure the confidentiality, integrity, and security of your personal data and to exercising due diligence.

Doğuş Hospitality takes necessary measures to prevent unauthorized access, misuse, unlawful processing, disclosure, alteration, or destruction of personal data. When processing personal data, Doğuş Hospitality uses commonly accepted security technology standards, such as firewalls and Secure Socket Layer (SSL) encryption. Furthermore, when submitting your personal data to Doğuş Hospitality via the website, mobile application, or mobile site, these data are transmitted using SSL encryption.

In relation to the prevention of unlawful access to personal data, unlawful processing of personal data, and ensuring the preservation of personal data, Doğuş Hospitality ensures the following:

- All sections of the website where personal data is collected are secured with SSL encryption.
- Access authorization and control matrices are established and enforced for employees to prevent the unauthorized processing of personal data collected through the website.
- Personal data in paper format is stored in locked cabinets and can only be accessed by authorized individuals.
- Personal data processed through cookies from third-party services are managed and protected in accordance with according to the guidelines rules defined in the cookie policy.
- Although Doğuş Hospitality takes necessary information security measures, in the event of an attack on the platforms operated by Doğuş Hospitality or its systems, resulting in personal data being damaged or accessed by unauthorized third parties, Doğuş Hospitality will immediately notify you and the Personal Data Protection Authority (KVKK) and take necessary corrective actions.

Rights of Data Subjects Under Article 11 of the Personal Data Protection Law (KVKK Law)

In accordance with Article 11 of the Personal Data Protection Law (KVKK Law), individuals whose personal data processed by Doğuş Hospitality, are entitled to the following rights:

- To learn whether personal data is processed,
- To request information regarding the personal data if it has been processed,
- To understand the purpose of processing personal data and whether it is used for its appropriately ,
- To be informed about the third parties, both domestic and international, to whom personal data has been transferred,
- To request the correction of personal data if it is incomplete or inaccurate,
- To request the deletion or destruction of personal data under the conditions specified in Article 7 of the KVKK Law,
- To request the notification of the actions taken pursuant to (d) and (e) to third parties to whom personal data has been transferred,
- To object to any outcome arising from the analysis of processed data exclusively through automated systems, if it has a negative impact on the individual,
- To seek compensation for damages caused by the unlawful processing of personal data.

To exercise your rights regarding your personal data, you can submit your request and exercise your rights by using the "Application Form" regulated under Article 13 of the KVK Law, which is available on the website or mobile application of the electronic commerce platform operated by Doğu Hospitality.

VIII. Transfer of Personal Data to Third Parties and the Purpose of Such Transfers

Our company, in accordance with the lawful purposes of processing personal data, takes the necessary security measures and may transfer the personal data and sensitive personal data of the data subject to third parties (including third-party companies, group companies and individuals). In doing so, our company acts in compliance with the provisions set forth in Article 8 of the Law.

Transfer of Personal Data to Third Parties Located Within Turkey

- Even in the absence of the data subject's consent, personal data may be transferred to third parties if one or more of the following data processing conditions ("Data Processing Conditions") apply, provided that all necessary security measures, including those prescribed by the Personal Data Protection Authority (KVKK), are taken: The relevant activities related to the transfer of personal data are explicitly foreseen in the laws.
- The transfer of personal data is directly related and necessary for the establishment or performance of a contract.
- The transfer of personal data is necessary for our company to fulfill its legal obligations.
- Personal data that has been made public by the data subject may be transferred by our company, provided that the transfer is limited to the purpose for which the data was made public.
- The transfer of personal data by our company is necessary for the establishment, exercise, or protection of the legal rights of our company, the data subject, or third parties.
- The transfer of personal data by our company is necessary for our legitimate interests, provided that it does not harm the fundamental rights and freedoms of the data subject.
- In case it is not physically possible, for the data subject to express consent, or if the consent is legally invalid, or if the transfer is necessary for the protection of the life or physical integrity of the data subject or another person.

International Transfer of Personal Data

Our company transfers personal data to foreign countries in accordance with the Personal Data Protection Authority (KVKK) ("Authority") laws, based on whether the country of transfer is recognised as having adequate data protection by the Authority, as described below.

1. Transfers to Countries Without Adequate Protection

In the recipient country is not listed among those with adequate protection as declared by the Authority, personal data may be transferred to third parties abroad provided that:

- at least one of the Data Processing Conditions exists,
 - the data subjects are able to exercise their rights and access effective legal remedies in the recipient country,
 - one of the following adequate safeguards is implemented in compliance with the fundamental principles outlined in Article 4 of the Law:
- An international agreement (not necessarily a formal treaty) exists between relevant Turkish and foreign public institutions approved by the Authority.
 - The use of binding corporate rules approved by the Authority, containing provisions related to the protection of personal data, which companies within an economic enterprise group are obliged to comply with.

- A standard contract declared by the Authority, specifies data categories, purposes of the data transfer, recipients, technical and administrative measures to be taken by the data recipient, and additional measures for sensitive personal data.
- A written undertaking ensuring adequate protection, subject to the Authority's approval.

2. Transfers to Countries with Adequate Protection

If the recipient country is designated as a secure country by the Authority, personal data may be transferred provided that one of the Data Processing Conditions exist.

Transfer of Sensitive Personal Data

Sensitive personal data may be transferred abroad in accordance with the principles outlined in this Policy and necessary administrative and technical measures, provided that the following conditions are met:

- The explicit consent of the data subject for the transfer of personal data is obtained.
- The transfer of personal data is explicitly provided for by law.
- The transfer of personal data is necessary for the protection of the life or physical integrity of the data subject or another person, where the data subject cannot give valid consent due to physical impossibility, or where their consent is not legally valid.
- The transfer of personal data by our company has been publicly disclosed by the data subject.
- The transfer of personal data by our company is necessary to establish, use, or protect the rights of our company, the data subject, or third parties.
- The transfer of personal data is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment, or care services, as well as the planning, management, and financing of health services by persons or authorized institutions and organizations under confidentiality obligations.
- The transfer of personal data is necessary to fulfill legal obligations in the areas such as employment, occupational health and safety, social security, social services, and social assistance.
- The transfer of personal data is related to foundations, associations, or other non-profit organizations formed for political, philosophical, religious, or union purposes, provided it complies with their relevant regulations and purposes, limited to their activities, and is not disclosed to third parties. This transfer can concern current or former members and individuals regularly in contact with these organizations.

Doğuş Hospitality, in compliance with lawful personal data processing purposes, will transfer personal data to third parties as outlined in this Privacy and Personal Data Protection Policy and in accordance with Articles 8 and 9 of the Law on the Protection of Personal Data.

Data Recipients and Transfer Purposes

The collected personal data may be shared with :

- Relevant departments of Doğuş Hospitality for reporting purposes.
- Relevant departments of Doğuş Information Technology and Technology Services Inc. for data collection and analysis purposes.
- Doğuş Holding Inc., its subsidiaries and affiliates, and third parties within Turkey and/or abroad with whom we have a contractual relationship.
- Member businesses, who are our program partners, for necessary reservations.
- Market research companies to improve customer satisfaction and for loyalty enhancement purposes..
- Relevant departments of Doğuş Tourism Group brands, if you give consent for the processing purposes outlined in the "Personal Data Processing Consent Form".

- Doğuř Information Technology and Technology Services Inc. with respect to your reservation information by the member businesses where reservations are made post registration.

For more information about Doğuř Information Technology and Technology Services Inc., visit “<https://www.d-teknoloji.com.tr/>” and for Doğuř Holding Inc., all subsidiaries, and affiliates, visit “www.dogusgrubu.com.tr.”

The personal data transferred, both within Turkey and abroad, is legally protected through the data protection clauses in our contracts, ensuring security through technical measures, and based on the assessment whether the recipient is a data controller or processor.

When sharing information as mentioned above, all international data transfers are carried out in accordance with this policy and within the limits of the applicable data protection laws.

IX. Accuracy and Currency of Your Personal Data

The individuals whose personal data is processed by our company, whether by submitting information through our Website and/or directly providing personal data through contractual relationships, acknowledge and declare that they are aware of the importance of ensuring the accuracy and currency of their personal data, in accordance with the Law on the Protection of Personal Data (KVKK). They also accept full responsibility for any consequences that may arise from providing incorrect information. This is essential for individuals to exercise their rights over their personal data as stipulated under KVKK and other relevant regulations.

X. Retention Period of Personal Data

Our company retains personal data for the period required to fulfil the purpose for which it was collected and for the minimum duration stipulated by relevant legal regulations. Our company first determines whether a specified retention period for personal data is defined under applicable regulations. If a statutory period exists, we comply with it. If no legal period is prescribed, personal data is retained for the duration necessary to achieve the intended purpose of processing.

Doğuř Hospitality retains personal data in compliance with the Law on the Protection of Personal Data (KVKK) for the period prescribed by the applicable regulations or as required by the purpose of processing. The relevant retention periods for personal data are outlined in our Personal Data Retention and Destruction Policy.

All records related to accounting and financial transactions	10 years	Turkish Commercial Code No. 6102, Tax Procedure Law No. 213
Traffic information related to online visitors	2 years	Law No 5651

Personal data of customers	10 years after the termination of the legal relationship; 3 years in accordance with Law No. 6563 and relevant secondary legislation; 90 days for CCTV recordings	aw No. 6563, Turkish Commercial Code No. 6102, Code of Obligations No. 6098, Tax Procedure Law No. 213, Consumer Protection Law No. 6502
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XII. Deletion, Destruction, or Anonymization of Your Personal Data

The website [<https://bonusparkorman.com.tr/>] retains personal data processed in accordance with Articles 7 to 17 of the Law on the Protection of Personal Data (KVKK) and Article 138 of the Turkish Penal Code, for the durations prescribed by the relevant laws and/or the necessary duration for processing purposes. Once these periods expire, the personal data will be deleted, destroyed, or anonymized in accordance with the relevant regulations on the Deletion, Destruction, or Anonymization of Personal Data.

The deletion of personal data by Doğuş Hospitality means making the personal data inaccessible and unusable for any purpose by the relevant users. To achieve this, Doğuş Hospitality establishes and enforces access rights and control matrix at the user level and takes necessary measures and precautions to perform the deletion operation within the database.

The destruction of personal data by Doğuş Hospitality means rendering the personal data inaccessible, irretrievable, and unusable by anyone, in any way.

Anonymization of personal data by Doğuş Hospitality means ensuring that the personal data can no longer be associated with any identifiable or identifiable real person, even if matched with other data.

Doğuş Hospitality sets forth the methods and technical and administrative measures it takes for deletion, destruction, and anonymization in its Personal Data Retention and Destruction Policy, which was prepared in accordance with the Regulation on the Deletion, Destruction, or Anonymization of Personal Data. This policy also specifies that the periodic destruction, as required by the regulation, will be performed every 6 months.

XIII. Changes and Updates to the Policy

Doğuş Hospitality may make changes or updates to this Policy in accordance with legal regulations and company policy. Such changes shall become effective immediately upon publication of the updated policy. Relevant individuals will be informed of such changes and updates through the website.