PRINCIPLES FOR CONFIDENTIALITY AND PERSONAL DATA PROTECTION

1. PURPOSE AND SCOPE

These Principles for Confidentiality and Personal Data Protection (hereinafter referred to as the "**Principles**") set out the principles regarding the protection of personal data, adopted by Elit Turizm Yatırım Anonim Şirketi and its group companies (hereinafter referred to as the "**Company**") and aim to inform all relevant person groups within the scope of the Personal Data Protection Law No. 6698 (hereinafter referred to as the "**PDPL No. 6698**").

2. PRINCIPLES FOR PROCESSING OF PERSONAL DATA

The Company processes your personal data in the capacity of Data Controller according to the following principles.

2.1. Processing in Compliance with Law and Principles of Honesty

Your personal data are processed in accordance with the principles which are introduced by legal regulations, and the rule of general trust and honesty. In accordance with this principle, when trying to achieve our personal data processing purposes, we take your interests and reasonable expectations into account, do not misuse our rights, and act in accordance with the principle of transparency in our data processing activities.

2.2. Ensuring that Personal Data are Accurate, and Up-To-Date when Necessary

Following this principle which emphasizes the importance of accuracy and up-to-dateness of personal data, we take your legitimate interests into consideration and make periodical verifications and updates in order to ensure that the data processed are accurate and up-to-date, and take the necessary measures accordingly. In this context, we set up systems for controlling the correctness of personal data and making necessary corrections within the corporate body of the Company. In addition, we check the accuracy of the sources from which personal data is collected and consider the requests arising from inaccuracies in personal data. Therefore, this principle is applied in accordance with your right to request correction of your personal data pursuant to PDPL No. 6698.

2.3. Processing for Specific, Clear and Legitimate Purposes

Your personal data are processed for clear, specific and legitimate purposes of data processing. In this regard, we ensure that our personal data processing activities are clearly understandable to the relevant persons, and we determine and clearly state the purposes and legal processing conditions on which they are based, as stated in Article 3 of these Principles.

2.4. Being Relevant, Limited and Proportionate to the Purpose of Processing

Your personal data are processed proportionately to the extent necessary for achieving the envisaged purpose/purposes, and in a manner that is relevant and limited to the purpose, and we abstain from processing any personal data which are not related to achieving the purpose or which are not needed in that respect. Again, under this principle, personal data is not collected or processed for purposes that do not currently exist and are considered to exist later.

2.5. Preserving for the Period Stipulated in the Relevant Legislation or the Period Required for the Purpose of Processing Thereof

Your personal data are preserved only for the period prescribed in the relevant legislation or the period required for the purpose of processing thereof. In this regard, the Company takes and implements the relevant administrative and technical measures. First of all, we identify whether a period is stipulated in the relevant legislation for the preservation of personal data, and if such a period is prescribed, we act in accordance with it, and if no such period is prescribed, we preserve the personal data for the period required for the purpose of processing thereof. If the relevant processes are not necessary anymore, access to your personal data by unrelated departments will be prevented within the scope of the deletion as specified in the PDPL No. 6698. In case of expiry of such period or in case the reasons requiring them to be processed cease to exist, provided there is no legal reason for allowing them to be processed for longer periods, your personal data are deleted, destroyed or anonymized in accordance with personal data protection legislation.

3. CONDITIONS FOR PROCESSING OF PERSONAL DATA

Your personal data and special categories of personal data under PDPL No. 6698 can be processed under the conditions set out below.

3.1. When Expressly Prescribed by the Laws

The fundamental rule is that personal data cannot be processed without the explicit consent of the relevant persons. And according to this exception, your personal data may be processed in cases where the processing of personal data is expressly stipulated in the laws.

3.2. Inability to Obtain Express Consent of the Relevant Person Due to Actual Impossibility

In case it is mandatory to process personal data of the relevant person, who is unable to give his/her consent or whose consent cannot be obtained, in order to protect the life or bodily integrity of that person or any other person, personal data may be processed.

3.3. Direct Relationship with Conclusion or Performance of a Contract

Where the processing of personal data belonging to the parties to a contract is necessary, such personal data may be processed provided that it is directly related to the conclusion or performance of the said contract.

3.4. The Company's Performance of its Legal Obligation

Your personal data may be processed if processing is mandatory in order to fulfill the legislation, contracts or similar legal obligations to which the Company is bound and responsible.

3.5. Personal Data Becoming Public

If your personal data is made public by you, that is, shared with the public, it may be processed in a manner that is proportionate and in connection with the purpose of making it public.

3.6. Obligation to Process Data for Establishment or Protection of a Right

To carry out and manage the processes related to the legal and commercial rights of the Company, your personal data may be processed if data processing is mandatory for the establishment, exercise or protection of the said right.

3.7. Processing of Data Based on Legitimate Interest

Your personal data may be processed if it is necessary based on legitimate interests of the Company. If our company needs to process data depending on the said processing condition, it will evaluate it by taking into account your fundamental rights and freedoms and make a decision according to the results of the evaluation.

3.8. Processing of Data Based on Express Consent

Although the main rule is that personal data is processed based on explicit consent, the explicit consent of the relevant persons is not relied upon if the other conditions specified in this article are met. Otherwise, it may be considered an abuse of rights. In this regard, your personal data may be processed on the basis of express consent in cases where they cannot be processed based on any of the conditions specified in these principles.

3.9. Processing of Special Categories of Personal Data

We process your special categories of personal data pursuant to Article 6 of the PDPL no. 6698 provided that you have given your explicit consent, it is clearly stipulated in the laws, it is in agreement with the will of the relevant person to make the data public and related to the personal data he/she has made public, it is mandatory for the establishment, exercise or protection of a right, and it is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance.

4. TRANSFER OF PERSONAL DATA

Your personal and special categories of personal data may be transferred to our domestic business partners, public institutions and organizations and the like, or to our business partners abroad, within the scope of Article 2 of these Principles. During such transfers, we observe the compliance with Articles 8 and 9 of the PDPL No. 6698. If necessary, your explicit consent is obtained and the transfer is made within this framework.

5. SAFETY OF PERSONAL DATA

In order to ensure the safety of personal data and prevent unlawful processing thereof, the Company takes any reasonable administrative and technical measures to prevent risks of unauthorized access, accidental data losses, deliberate deletion of data or damages to data.

To prevent access to personal data by persons other than those who have been granted authorization to access, all reasonable technical and physical measures are taken. In this context, the authorization system in particular is designed in such a way that it will be impossible for any persons or systems to access personal data to an extent which is more than required.

The company conducts and causes the carrying out of necessary audits in its institution or organization in order to ensure the implementation of the provisions of the PDPL No. 6698.

The measures taken are as follows.

- Network security and application security are ensured.
- A closed system network is used for personal data transfers over a network.
- Key management is implemented.
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems.
- The security of the personal data stored on the cloud is ensured.
- Disciplinary regulations containing data security provisions are in place with respect to the employees.
- Training and awareness-raising activities on data security are organized at regular intervals for the employees.
- An authorization matrix has been created for the employees.
- Other- A data breach response plan has been created and implemented.
- Other- A coordination committee has been established for the sustainability of the PDPL compliance process.
- Access logs are regularly taken.
- Corporate policies were prepared and started to be implemented about access, information security, usage, storage, and destruction.
- Letters of undertaking for confidentiality/privacy are obtained.
- Relevant authorizations of the employees whose position has changed, or who have left their job, are revoked.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- The executed agreements contain provisions on data security.
- Additional security measures are taken for personal data that are transferred in hard copy and the relevant documents are sent after being marked as classified.
- Personal data security policies and procedures have been determined.
- Personal data security issues are reported forthwith.
- Security of personal data is monitored.
- Necessary security measures are taken regarding the entry to - exit from physical sites containing personal data.

- Security of physical sites containing personal data is ensured against external risks (fire, flood, etc.).
- Security of media containing personal data is ensured.
- Personal data are minimized to the extent possible.
- Personal data are backed up and the backed-up personal data are protected.
- User account management and authorization control system are implemented and are monitored.
- In-house periodic and/or random inspections are carried out and procured to be carried out.
- Log records are taken in a way that will not allow user intervention.
- Current risks and threats have been identified.
- Protocols and procedures regarding security of special categories of personal data have been determined and are being implemented.
- If special category of personal data will be sent by electronic mail, it is always encrypted and sent through KEP *(registered electronic mail)* or corporate e-mail accounts.
- Secure encryption/cryptographic keys are used for special category of personal data, which are managed by different departments.
- Intrusion detection and prevention systems are used.
- Cyber-security measures have been taken, and their implementation is constantly monitored.
- Encryption is made.
- Special categories of personal data are copied on portable flash memory, CD and DVD environment and are encrypted for transfer.
- The data processor service providers are audited on data security at certain intervals.
- Awareness-raising activities are carried out to ensure data security of data processor service providers.
- Data loss prevention software is used.

6. RIGHTS OF THE RELATED PERSON AND APPLICATION PROCEDURES AND PRINCIPLES

As the relevant person, if you have a request regarding your rights stipulated in Article 11 of Law No. 6698 and if you are a citizen of the European Union, you can submit your requests regarding your rights such as withdrawing your explicit consent, obtaining information regarding your data and accessing your data, correcting or deleting your personal data or limiting the processing of your personal data in certain cases, data portability under certain conditions, objecting to the processing of your personal data, and similar rights within the scope of the GDPR by filling out the Application Form Regarding the Protection of Personal Data, which you can access on our website, or by submitting your application that meets the minimum conditions stipulated in the Communiqué on the Procedures and Principles of Application to the Data Controller, using the following methods. We will conclude your application on a free-of-charge basis within the shortest time possible depending on the nature of the request, but in any event within no later than thirty days. However, in case the process requires any additional cost, the Company will receive the fee in the tariff determined by the Board of Protection of Personal Data. If your application is rejected, the response is found insufficient or the response is not given on time upon your application, you can inform us about this and, as the relevant person, you have the right to apply to the competent data protection authority in your country within thirty days from the date you learn of our response and, in any case, within sixty days from the date you made your application in accordance with the procedure.

Application Method	Application Address

The message you will send through your e-mail registered in our system or bearing a secure electronic signature or mobile signature.	kvkk@eliteworldhotels.com.tr
Application submitted in writing, in person or through a notary public	Kocatepe Mah.Şehit Muhtar Bey Cad. N.40 40 Beyoğlu Istanbul