

DISCLOSURE TEXT ON THE PROCESSING OF PERSONAL DATA

1. Data Controller, Personal Data Categories and Collection Methods

In accordance with the Personal Data Protection Law No. 6698 (“PDPL No. 6698”), your personal data in the form of identity information, contact information, legal procedure information, customer transaction information, financial information and transaction security information are collected by you or third parties by fully automatic methods via written data transfer in electronic environment and processed by us, Elit Turizm Yatırım Anonim Şirketi (“Company”), as the data controller, within the scope detailed below.

2. Purposes and Legal Grounds for Processing Your Personal Data

Your personal data collected by the Company is processed based on the following purposes and legal grounds.

Purpose of Data Processing	Data Category	Legal Grounds
To carry out goods/service sales and after-sales support services	Identity, Contact, Customer Transaction, Legal Procedure, Financial	PDPL No. 6698 art. 5/2-c Where processing of personal data belonging to parties to a contract is necessary, provided that it is directly related to entering into or performing the contract
To carry out production and operational processes for goods/services		
To carry out contractual processes		
To carry out reservation processes		
To carry out the activities in accordance with the legislation	Identity, Contact, Customer Transaction, Financial, Transaction Security	PDPL No. 6698 art. 5/2-a Expressly prescribed by the laws.
To carry out financial and accounting procedures	Identity, Contact, Customer Transaction, Financial	PDPL No. 6698 art. 5/2-ç It is mandatory for the data controller to fulfill its legal obligations.
To carry out the information security processes	Transaction Security	
To carry out communication activities	Identity, Contact, Customer Transaction	PDPL No. 6698 art. 5/2-f When such data processing is required for the legitimate interests of the data controller, provided this does not infringe relevant person’s fundamental rights and liberties
To carry out customer satisfaction processes		

For storage and archiving	Identity, Contact, Customer Transaction, Financial, Legal Procedure, Transaction Security	<p>PDPL No. 6698 art. 5/2-c Where processing of personal data belonging to parties to a contract is necessary, provided that it is directly related to entering into or performing the contract</p> <p>PDPL No. 6698 art. 5/2-f When such data processing is required for the legitimate interests of the data controller, provided this does not infringe relevant person's fundamental rights and liberties</p> <p>PDPL No. 6698 art. 5/2-ç It is mandatory for the data controller to fulfill its legal obligations.</p>
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3. Transfer of Personal Data

Your personal data may be transferred to third parties under the following conditions;

Legal Grounds for Transfer	Purpose of Transfer	Party Receiving the Transfer
<p>PDPL No. 6698 art. 8/2-a It is mandatory for the data controller to fulfill its legal obligations</p>	To carry out the activities in accordance with the legislation	Authorized Public Institutions and Authorized Private Persons
<p>PDPL No. 6698 art. 8/2-a Where processing of personal data belonging to parties to a contract is necessary, provided that it is directly related to entering into or performing the contract</p>	To transfer the necessary information to our business partners to fulfill the contract processes	Business Partners
<p>PDPL No. 6698 art. 9/4-c Presence of a standard contract declared by the Board, which includes matters such as data categories, purposes of data transfer, recipient and recipient groups, technical and administrative measures to be taken by the data recipient, and additional measures taken for special category of personal data.</p>	To carry out contractual processes	Business Partners Residing Abroad

4. Procedures and Principles for Application

As the relevant person, you can submit your requests regarding your rights stipulated in Article 11 of PDPL No. 6698 by filling out the Application Form Regarding the Protection of Personal Data, which you can access on the Company's 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.

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