"ÜÇYÜZ ALTMIŞ TURİZM ve TİC. A.Ş"

Website Privacy Notice

Pursuant to Law No. 6698 on the Protection of Personal Data ("LPPD"), your personal data may be processed by "ÜÇYÜZ ALTMIŞ TURİZM ve TİC. A.Ş." within the scope described below.

Identity	Name, Surname, Turkish ID number
Contact	Phone number, e-mail address, address
Customer	Reservation information, request and
Transaction	complaint information
Transaction	IP address, website login and logout
Security	details
Marketing	Behavioral and transactional information
	obtained through surveys and campaigns
	and tracking technologies

How Do We Collect Your Personal Data? On What Legal Grounds and For What Purposes Do We Process Your Personal Data?

Your personal data may be collected through our websites, communication channels, membership application forms and online forms including suggestions, complaints, information request, and our mobile applications.

Your personal data is collected and processed by the Company based on the personal data processing conditions specified in Article 5 of the LPPD for the purposes ("Purposes") and legal grounds set out below.

- Based on the legal ground that processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract (Article 5/2/c of the LPPD): Your identity, contact and customer transaction data may be processed for the purposes of carrying out and completing the reservation processes making through our website and providing relevant communication within this scope; and fulfilling the post-reservation support services.
- Based on the legal ground that it is expressly provided for by the laws and is necessary for compliance with a legal obligation to which the Company is subject (Article 5/2/a and ç of the LPPD): Your identity, contact, customer transaction and transaction security data may be processed for the purposes of fulfilling the legal obligations to which our Company is subject; ensuring compliance with the storage obligations stipulated in the legislation; providing information/documents to the component official authorities pursuant to the legislation, conducting all kinds of official correspondence, and responding to data subject applications in accordance with the legislation and taking necessary actions.
- Based on the legal ground that data processing is necessary for the establishment, exercise or protection of any right (Article 5/2/e of the LPPD): Your identity, contact, customer transaction and transaction security data may be processed for the purposes of evaluating requests and complaints, storing of personal data during the general statute of limitations in order to constitute evidence in possible future disputes.

- Based on the legal ground that processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject (Article 5/2/f of the LPPD): Your identity, contact, customer transaction and transaction security data may be processed for the purposes of executing commercial activities conducted out by the Company to carry out the necessary activities by our relevant business units; planning business strategies and conducting business processes; Carrying out personalized advertising activities for the purpose of serving customers in accordance with their tastes, executing the necessary controls to ensure the security of our website; carrying out strengthening activities in terms of information security; planning and executing of the management processes of corporate communication activities; managing of the customer/potential customer relations; carrying out the necessary activities to enable the data subjects to benefit from the products and services offered by our Company, including the sales and marketing activities of our products and services; following customer acquisition activities; providing information to third parties or legal entities who have a business relationship with our Company within the scope of conducting commercial activities; ensuring the legal, technical, commercial and business security of our Company and the parties who have a business relationship with our Company; determining and implementing our Company's commercial and business strategies; finalizing your requests, questions, suggestions and complaints and carrying out all necessary research, development, corrective and preventive activities to prevent reoccurrence of the incidents subject to the complaint; and evaluating suggestions to enhance our services provided.
- Based on the legal reason of explicit consent (KVKK article 5/1): Identity, communication, in order to carry out the marketing processes of our company's products and services, to recommend and promote the products and services offered, including profiling and analysis activities, by customizing them according to your tastes, usage habits and needs. and your marketing data may be processed. In addition, your identity and contact data may be processed in order to send advertisements, promotions, campaigns and similar commercial electronic messages to the contact information you share with our Company.

With Whom and For What Purposes May We Transfer Your Personal Data?

Your collected personal data may be transferred to our business partners, suppliers and, if you give explicit consent, within the scope of our legitimate interest within the framework of the realization of the above-mentioned Purposes, to "ÜÇYÜZ ALTTIŞ TURİZM ve TİC." for the purpose of providing personal advertising services. A.Ş." In accordance with the rules regarding the transfer of personal data specified in Article 8 of the KVKK, within the scope of the data processing conditions set out in Article 5 of the KVKK, to legally authorized public institutions and legally authorized private persons, within the scope of the purpose of creating a common data pool created on behalf of our company, as clearly stipulated in the law and to fulfill our legal obligations. can be transferred.

What Are Your Rights as a Data Subject?

We would like to inform you that you are entitled to following rights set forth under Article 11 of the LPPD. (i) learning whether your personal data are being processed, (ii) requesting information if your personal data have been processed, (iii) learning the purpose of the processing of your personal data and whether they have been used accordingly, (iv) learning which third parties domestic or abroad your personal data has been transferred to, (v) requesting rectification in case your personal data has been processed incompletely or inaccurately and notification of the operations made within this scope to third parties to whom your personal data and the notification to third parties whom your personal data has been transferred, (vi) demanding the erasure or destruction of your personal data and the notification to third parties whom your personal data has been transferred to in case the reasons requiring its processing have disappeared, although it has been processed in accordance with the LPPD and other relevant provisions of other laws (vii) objecting to negative consequences to you that are concluded, as a result of analysis of the processed personal data through solely automatic systems, (viii) demanding compensation for the damages that you have suffered as a result of unlawful processing of your personal data.

You may convey your requests concerning your rights listed above to our Company via <u>360istanbul@360istanbul.com</u> Depending on the nature of your request, your application will be concluded by the data controller you have applied for free of charge and as soon as possible, within 30 (thirty) days at the latest. However, if the process requires additional costs, a fee may be demanded according to the tariff determined by the Personal Data Protection Board.