



## GUEST CLARIFICATION TEXT ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

The purpose of this clarification text is to inform our guests about the procedures and principles regarding the processing of personal data stored by Infinity Seyahat İşletmeleri A.Ş.(hereinafter referred to as the **"Company"**) as the authorized data controller, in accordance with the provisions of the Law on the Protection of Personal Data No. 6698 (hereinafter referred to as the **"Law"**).

Your personal data shall be processed in accordance with the principles listed in Article 4 of the Law;

- In compliance with the Law and rules of good faith,
- Accurate and up-to-date,
- Processed for specific, explicit and legitimate purposes,
- Being relevant, limited and restrained to the purpose for which it is processed,
- Stored for the period of time stipulated by the relevant legislation or for the purpose for which it is processed.

In addition, we shall process your personal data as defined in the Law limited to the purposes and conditions set out in the personal data processing conditions specified in paragraph 2 of Article 5 and paragraph 3 of Article 6 of the Law.

Accordingly, we shall process your personal data in the following circumstances:

- It is explicitly ordered by the laws during the continuation of the service offered by our company,
- Processing your personal data is directly related to and necessary for the establishment or performance of a contract,
- Processing your personal data is mandatory for our Company to fulfil its legal obligations,
- Provided that your personal data has been made public by you; processing your data is limited by the purpose of your publicization,
- It is mandatory for the establishment, exercise or protection of the rights of our Company, yourself or third parties,
- It is mandatory for the legitimate interests of our Company, provided that it does not harm your fundamental rights and freedoms
- Personal data processing is mandatory for protecting the life or physical integrity of the data subject or of any other person, where the data subject is legally or physically incapable of giving consent
- Processing sensitive data excluding those relating to health or sexual life, is provided for by the Law

In this context, our company shall process your personal data for the following purposes:

- Planning and execution of corporate sustainability activities
- Event management
- Guest / customer relationship management



- Management of relations with business partners or suppliers
- Execution / follow-up of company financial reporting and risk management processes
- Execution / follow-up of company legal affairs
  
- Planning and execution of corporate communication activities
- Execution of corporate management activities
- Demand and complaint management
- Ensuring the security of community values
- Conducting studies to protect the reputation of the company.
- Managing investor relations
- Providing information to authorized institutions arising from legislation
- For creating and tracking visitor records

We declare that your personal data may be processed;

1. Within the scope of our commercial relations or our business relationship with you,
2. Within the scope of the purpose that requires them to be processed and with regard to this purpose in a related, limited and restrained manner,
3. By maintaining the personal data which you have submitted to us or was submitted to us accurate and up-to-date
4. May be recorded, stored, maintained, reorganized, shared with the institutions authorized by law to request such personal data, transferred to domestic or foreign third parties, transferred, classified our processed in other ways as specified in the Law.

The Company shall pay particular attention to the security of personal data and shall take all necessary technical and administrative measures. Following the termination of the service, by taking all necessary administrative and technical measures, the identification and communication data specified under the heading of Processed Personal Data below shall be kept for 10 years, your personal and audio-visual data and the personal data of your family and relatives shall be kept for 2 years.

While your personal data may vary depending on the services provided by the Company and the commercial activities of the Company; it may be collected verbally, in writing or electronically by automated or non-automated means, through the Company's business units and offices, group companies, website, social media channels, mobile applications, agencies and similar means. Throughout your use of our Company or group companies' products and services, your personal data may be generated and updated.

Furthermore, your personal data may be processed when you use our call centres or website to utilize company services, when you visit the Company or our website, request services from the Company through agencies, and participate in training, seminars or events organized by the Company.



#### PROCESSED PERSONAL DATA

**Identification:** Name, surname, date of birth, nationality, place of birth, gender, marital status, passport number, license information, Turkish Identification ( Turkish ID number, series number, ID number, father's name, mother's name, place of birth, province, county, district, volume number, family serial number, serial number, section number, page number, record number, place of issue, reason for issue, date of issue, maiden name), copy of identification card; name, surname, Turkish ID number, passport number, date of birth, phone number of spouse and children; name, surname and e-mail address of relatives who can be contacted in case of emergency

**Contact Information:** Telephone number, work phone number, postal code, full address information, work address, e-mail address and work e-mail address

**Health Information:** Health data, Food allergy, Disease surveillance date information, Disease symptoms information, Disease Surveillance rate information,

**Audio - Visual Records:** Audio recordings, camera recordings (video shots such as birthday celebration etc.) belonging to a natural person

**Location:** Room number, travel related information, transfer information, transfer stop-over data

**Processing Security:** : internet access logs, input and output logs

**Physical Environment Security:** Guest check-in and check-out dates

**Other:** License plate, Guest product acceptance information, agency / company information, profession

#### To Whom and For What Purposes Processed Data May Be Transferred

Within the framework of the conditions specified in this clarification text and by taking necessary measures, your personal data may be transferred to our business partners, suppliers, company officials, shareholders, legally authorized public institutions and private persons for the purpose of conducting necessary studies in order for you to benefit from the products and services offered by our Company, to customize our products and services according to your likes, usage habits and needs, to ensure the legal and commercial security of the persons in a business relationship with our Company and group companies (the administrative operations carried out for communication, ensuring the physical security and surveillance of the sites of our Company, evaluation processes of business partner / customer / supplier (authorized personnel or employees), reputation management processes, legal compliance process, audit, financial affairs etc.), for determining and implementing the business strategies of our Company and ensuring the execution of the guest services policies of our Company

Persons to Whom Data May Be Transferred	Description	Purpose for Data Transfer
Business Partner (agency, customer etc.)	Defines the parties that the Company has established a business partnership with for the purpose of buying or selling services during the course of the Company's commercial activities.	Limited to the purpose of; Ensuring that the establishment objectives of the business partnership are fulfilled, to evaluate authorized personnel or employees
Supplier	Defines the parties that offer	



	products / services to the Company on a contractual basis in accordance with the Company's orders and instructions, during the course of the Company's commercial activities.	Limited to the purpose of providing the products and services that the company acquires from external sources for conducting its commercial activities .
Company Officials	Company board members and other authorized natural persons	Limited to the purpose of ensuring the physical security and surveillance of the sites of the company, to develop strategies for the commercial activities of the company in accordance with the provisions of the relevant legislation, to ensure the highest level of management, financial affairs etc.
Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized to receive information and documents from the Company according to the provisions of the relevant legislation	Limited to the purpose requested by the relevant public institutions and organizations within their legal authority
Legally Authorized Private Legal Persons	Private legal persons authorized to receive information and documents from the Company according to the provisions of the relevant legislation	Limited to the purpose requested by the relevant private law persons within their jurisdiction

#### **Method and Legal Reason for Personal Data Collection**

Your personal data is collected in all verbal, written or electronic environments in line with the aforementioned purposes with the aim of offering our products and services in accordance with the legal framework and, within this scope, with the aim of fulfilling our Company's contractual and legal obligations in a complete and accurate manner. For these legal reasons, your personal data is collected using manual or electronic media within the scope of the terms and purposes of processing personal data specified in this clarification document.

#### **According to Article 11 of the Law, you have the following rights:**

- a) To learn whether personal data has been processed or not,
- b) To request information regarding personal data if it has been processed,
- c) To learn the purpose of the processing of personal data and whether it is used for its intended purpose,
- ç) To know the third parties to whom personal data has been transferred to at home or abroad,
- d) To request the rectification of incomplete or incorrect personal data, if any,
- e) To request the deletion or destruction of personal data,



- f) To request the notification of operations carried out as per subparagraphs (d) and (e) to third parties to whom personal data has been transferred,
- g) Object to the occurrence of any result that is detrimental to your interests by means of analysis of personal data exclusively through automated systems,
- h) To request compensation for the damage arising from the unlawful processing of your personal data.

Your requests in your application shall be concluded free of charge within thirty days at the latest, depending on the nature of the request. However, if the transaction necessitates an additional cost for the Company, the fee determined by the Personal Data Protection Board in the “Communique on the Procedures and Principles on the Application to the Data Controller” may be charged.

You are required to submit your application to our Company regarding the processing of your personal data by filling out the application form on our Company's internet address, in writing or by using your registered e-mail address, secure electronic signature, mobile signature or by using your e-mail address which you have previously submitted to us and which is kept in our records. Depending on the reason of your request and your application method, additional verifications (such as sending a message to your registered phone, or a phone call) may be requested by our Company in order to determine whether the application belongs to you and thus to protect your rights. For example; if you apply through your e-mail address registered at the Company, we may contact you using another contact method registered in the Company and request confirmation of whether the application belongs to you.

#### **What are the methods for application?**

Pursuant to paragraph 1 of Article 13 of the Law, you may submit your request regarding the exercise of your aforementioned rights to our Company in writing or via other methods determined by the Personal Data Protection Board. In this context, the channels and procedures by which you shall submit your written application within the scope of Article 11 of the Law are explained below.

In order to exercise your aforementioned rights, you can fill and sign the KVKK Application Form at <https://www.regnumhotels.com/en/personal-data-protection/> and send it to the Company along with the necessary information for verifying your identity

(i) After filling the application form, you may submit the signed copy of the form in person or via public notary to Infinity Global Tours’s mailing address.

(ii) You may fill the application form and send it to the e-mail address [kvkk@regnumhotels.com](mailto:kvkk@regnumhotels.com) with your “secure electronic signature” under the Electronic Signature Law No. 5070 or your mobile signature or by using the e-mail address previously submitted to the data controller by the data subject and registered in the data controller’s system.

In order for third parties to submit applications on behalf of the personal data owners there must be a special power of attorney issued by a notary public to the person submitting the application on behalf of the data subject.



Carya Turizm may request information from the relevant applicant in order to determine whether he/she is the personal data owner, and may ask a question to the personal data owner about his/her application in order to clarify the issues specified in the application.

Such rights shall be evaluated and concluded within 30 (thirty) days if they are submitted by the methods specified in the policy. Although it is essential that no fee is charged for the requests, the Company reserves the right to ask for a fee determined by the Personal Data Protection Board.

#### **CONTACT INFORMATION**

**ADDRESS:** Regnum Carya- Kadriye Bölgesi Üçkumtepesi Mevkii, Belek Antalya

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