

Orange County Hotels (TOROS-HAN RESTAURANT TURİZM SANAYİ VE TİCARET A.Ş.)

PERSONAL DATA PROTECTION AND PRIVACY POLICY

Website Confidentiality Agreement

During your visit to this website and your use of the service through this Site, how the information that we receive regarding you and the services you request will be used and protected are subject to this “Confidentiality Agreement”. You hereby accept the conditions stipulated in this “Confidentiality Agreement” when you visit this website and request to use the services we provide through this Site.

PURPOSE OF PERSONAL DATA PROTECTION AND PROCESSING POLICY

Until today, data and information of our customers or potential customers are kept confidential and have never been shared with third parties by virtue of the sensitivity of our business as Orange County Hotels. Personal data protection is our essential policy. Even before any legal regulation, our company and subsidiaries had attached a great importance to the confidentiality of personal data, adopted as a working principle and gave working instructions to the employees in compliance with this principle. As “Orange County Hotels”, we undertake to adhere to all responsibilities of Privacy Act. The principle of our companies to protect personal data also covers our subsidiaries.

SCOPE AND CHANGE OF PERSONAL DATA PROTECTION AND IMPLEMENTATION POLICY

This Policy prepared by our Company has been regulated in accordance with “Law on Protection of Personal Data” no. 6698 (“KVKK”). The Law has entered into force with all of its provisions as of today. The data received with your consent or pursuant to the other regulations as per to the Law shall be used to make our service more quality and to improve our services and quality policy. Again, some of the data we obtain are removed from the scope of personal data and anonymized. These data are used for statistical

purposes and not subject to the enforcement of Law and our Policy. “Personal Data Protection and Implementation Policy of Orange County Hotels” aims and regulates the protection of the data which are automatically obtained from our customers, potential customers, employees and the customers and employees of the companies in cooperation with us for solution partnership and the other parties. Our company reserves the right to change our Policy and Regulation – provided to comply with the Law and protect the personal data in a better way.

PURPOSE OF DATA PROCESSING

Collection and processing of personal data by “Orange County Hotels” shall be executed in line with the purposes stipulated in the letter of clarification. The data are collected and processed to draw up contracts and provide better services to the customers.

GENERAL PRINCIPLES ON PROCESSING OF THE PERSONAL DATA

- a) Being in compliance with the law and good faith: “Orange County Hotels” questions the source of the data it collects or sent by other companies and attaches importance to handling these in compliance with the law and good faith. Within this framework, it warns and notifies the third parties (agencies and other intermediary firms) that sell the services provided by “Orange County Hotels” to protect the personal data.
- b) Being accurate and up to date, if necessary: “Orange County Hotels” attaches importance to the accuracy of all of the data kept within the organization, to the fact that they don’t include any misinformation and that personal data are updated only if the changes are notified.
- c) Being processed for specified, explicit, and legitimate purposes: “Orange County Hotels” processes the data limited to the services and purposes for which consent of the persons are taken during the services. It shall not process, use and make use of the data out of business purposes.
- d) Being relevant, limited and proportionate to the purposes for which data are processed: “Orange County Hotels” uses the data only for processing purposes and to the extent what the service requires.
- e) Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected: “Orange County Hotels” keeps the contractual data as long as it’s required by the commercial and taxation law as well as the periods of conflicts of law. Nevertheless, it shall delete or anonymize the data in case the reasons necessitating their processing cease to exist.

It's crucial to state that whether "Orange County Hotels" collects or processes the data by one's will or in compliance with the law, the abovementioned provisions shall apply anyhow.

You shall have the following rights pursuant to Article 11 of Law on Protection of Personal Data. A separate application shall be prepared by "Orange County Hotels" for you to facilitate your related rights.

Maximum Savings Policy/Scrimping Policy

Pursuant to our policy called as maximum savings policy or scrimping policy, the data received by "Orange County Hotels" are processed into the system as required. Thus, which data we will collect shall be determined according to the purpose. Unnecessary data shall not be collected. Other data submitted to our company are transferred to the information system of the company in the same way. Redundant information is not stored in the system, they are deleted or anonymized. These data may be used for statistical purposes. Health data among the special quality data are only kept in the system to provide better service to the customers and to protect their health.

Deletion of personal Data

When the retention period necessitated by the Law expires, judicial procedures are completed or other requirements no longer exists, these data shall be deleted, removed or anonymized automatically, by the company or upon the request of the relevant person.

Accuracy and Currency of Data

The data within the body of "Orange County Hotels" are processed as declared by the relevant persons as a rule. "Orange County Hotels" is not obliged to check up on the accuracy of the data declared by the customers or the persons in touch with "Orange County Hotels" and it's also contrary to the Laws and our working principles. The declared data are regarded as correct and accurate. The principle of accuracy and currency of personal data has also been adopted by "Orange County Hotels". The personal data processed upon the request of the relevant person or from official documents that are submitted to our company are updated. Necessary precautions are taken for this purpose.

Confidentiality and data security

Personal data are confidential and "Orange County Hotels" obeys the rule of confidentiality. Only authorized persons shall access the personal data. All necessary technical and administrative measures are taken to protect the

personal data collected by “Orange County Hotels” and to prevent the damage on our customers and potential customers. Within this framework, it shall be ensured that the software complies with the standards, third parties are selected with caution and data protection policy is observed within the company.

DATA OF CUSTOMER, POTENTIAL CUSTOMER AND BUSINESS AND SOLUTION PARTNERS

As “Orange County Hotels”, we process your personal data in the capacity of data supervisor within the scope of Personal Data Protection Law no. 6698 and other relevant legislations.

In this sense, categories and explanations of personal data to be processed are as follows:

- Identity Information: Name-surname, name-surname of accompanying guest/guests; nationality, birth place and date, T.R. Identity, driver’s license and passport numbers (including date and place of issue).
- Contact Information: Address, telephone number, e-mail address.
- Financial Information: Mobile invoice information, bank account information, payment card information, Loyalty Program memberships, information about purchased product or services.
- Customer reviews, feedbacks and complaints: Special preferences in accommodation, marketing and communication fields; reviews, opinions or complaints about the brands and properties.
- Other: Reservation details, travel history; information on participation in competitions, draws or marketing programs, information of vehicles used to access the property; booked hotel, airline and rental car packages; associated groups to stay in the properties, frequent-flyers or Travel Partnership Program memberships and member numbers, information provided during membership and account applications.

Collection and processing of data for contractual relationship

In case of a contractual relationship with our customers and potential customers, the collected personal data may be used without the approval of the customers. However, this use shall be for the purpose of the contract. The data shall be used for better execution of the contract and as required by the services and updated, if necessary, by contacting the customers. Nevertheless, the data provided to us by our potential customers shall be processed to easier and more quality services later. These data shall be deleted upon requests in case of lack of any contractual relationship.

Data of Business and Solution Partners | “Orange County Hotels” adopts as a principle to act in compliance with the laws when exchanging the data both with business and solution partners. The data are shared with the business and solution partners with the understanding of data confidentiality and as required by the services and it’s definitely ensured that these parties take measures regarding the data security.

Processing data to manage, analyse and improve the services provided in the properties

- Carrying out a questionnaire study with the aim of measuring the services provided,
- Communicating with guests for marketing purposes in line with the communication permits within the scope of miscellaneous laws,
- Exchanging internal correspondences with guests violating the property and general codes of conduct during the accommodations at the hotel and preparing a list in line with these information,
- Recording the comments of guests on social media, blogs, review portals etc. into the system to analyse the feedback of the service provided,
- Carrying out Sales and Marketing activities to offer a tailor-made holiday experience by processing the data of services provided to the guests.

Managing relations with guests before, during and after the accommodation

- Calling guests before check-in,
- Customer Loyalty Program management,
- Answering questions of guests on Loyalty Program, card categories, how to upgrade your card etc.,
- Doing segmentation by analysing the data about reservation history, travel preferences and services purchased with the aim of correctly managing the marketing activities,
- Managing allegations/complaints about our properties and services on review portals, complaint pages, social media etc.,
- Keeping personal information of guests up-to-date and combining with data to be obtained from third party sources for analytical purposes.

Survey delivery and data processed with this form

Survey deliveries are made within the framework of ARTICLE 6 – (1) of the Law on the Regulation of Electronic Commerce No. 6563, regarding the commercial electronic message transmission clause.

Your valuable opinions will be processed in order to increase our existing service quality, collect plannings and insights regarding new services and enable property officials to evaluate the services they provide from your perspective. Your information, limited only to the e-mail address, will be shared with Related Marketing Cloud (RMC) and QuestionPro Survey Software companies in order to enable survey delivery.

In addition, our guests accept and undertake that they write their reviews according to their own experience, they are their own sincere opinions about the hotel, they have no personal or commercial ties to the property and no material/moral incentive or payment is offered to write such review.

E-invoicing & E-Archive Invoice

Within the scope of this program, customer is automatically enrolled in e-invoicing program and invoices are sent to the e-mail address he/she has provided to the property. It's the responsibility of the customer to ensure that the e-mail address is accurate and preferred one for this communication, which is provided during check-in or updated later. If a reservation is made for another family member or other persons using this e-mail address, e-invoice of the relevant invoice is sent to the address of the e-mail address.

e-Invoice is an invoice that is issued in electronic environment, not printed on the paper and sent to the receiver and/or vendor through the servers. It has entered into force with TPL communique with order no. 397 of Turkish Republic's Tax Procedure Law and has been put into practice since March 5, 2010.

As per TPL, e-Invoice contains all information required to be present in an invoice and mutual invoice submission between the receiver and vendor are realized in electronic environment.

e-Archive Invoice is an implementation that ensures the invoice which must be issued, kept and submitted on paper as per Tax Procedure Law is issued in electronic environment and its secondary copy is kept and submitted in electronic environment in compliance with General Communique on Tax Procedure Law with order no. 433. In e-Archive Invoice, all invoices except for the invoices issued for taxpayers registered in e-Invoice Implementation are designated as e-Archive Invoice.

Data processing for advertisement purposes

Electronic messages for advertisement purposes can only be sent to the persons with prior consent in compliance with the Law on the Regulation of E-Commerce and the Law on Commercial Communication and Commercial Electronic Messages. An explicit consent of the person is required to send advertisements. "Orange County Hotels" obeys the details of "the consent" specified in the same legislation. The consent to be obtained should cover all commercial electronic messages that are sent to the electronic communication addresses of the recipients to promote and market the goods and services of the company, to promote the business or to increase the recognition level of the company with contents including greetings and wishes. This consent may be obtained via any electronic communication channel or at physical medium in written. The important thing is to obtain the declaration of the recipient that he/she accepts to receive commercial

electronic messages and to have his/her full name and electronic communication address.

Data processing due to legal obligations of the company or being stipulated explicitly in the Law

Personal data may be processed without prior consent when it's stipulated explicitly in the relevant legislation or to fulfill a legal obligation specified in the legislation. Type and scope of the data processes are required for data processing activity that is permitted by the Laws and they should comply with the relevant legal provisions.

Personal data may be processed pursuant to the legal purposes and the services of the company. However, the data shall not be used for services contrary to the laws under any circumstances.

Processing of special quality data

In order to provide better services, Orange County Hotels may, with the consent of the individuals, process special data exclusively for the purpose for which it was collected. In accordance with the circulars issued under Covid-19 and statutory provisions, our hotel facilities may request certain personal data, including special personal data such as health data from you and your relatives. These personal data can be passed on to authorities and health facilities if required.

Pursuant to the Law, race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothes, membership of association, foundation or union, health, sexual choice, juridical sentence and data regarding safety measures and biometric and genetic data are among the special quality data. "Orange County Hotels" also takes adequate measures determined by the Board for the processing of special quality data. "Orange County Hotels" may process the special quality data only for the corresponding purposes to provide better services.

Data processed with automatic systems

"Orange County Hotels" acts in compliance with the Law for data processed with automatic systems. The information obtained from these data without the explicit consent of the persons shall not be used against the person. However, "Orange County Hotels" may take decisions regarding the persons that it will perform process by using the data within the system.

Purpose of Collecting and Processing Safety Data from Properties

Security footages taken due to your visit to Orange County Hotels that act in the capacity of data controller within the scope of Law no. 6698 are collected to ensure security of both you and our company and to provide service to you securely. Your personal data are not used for the purposes other than stated and processed based on the cause of action of the data

controller for its legitimate interests as per clause (f) of article 5/2 of The Law on Protection of Personal Data. Collected personal data cannot be shared with any third person or entity pursuant to the rules. However, they can be shared to meet the demands of state institutions and organizations authorized by law to fulfil the legal obligations stipulated in clause (ç) of article 5/2 of the Law. When the purpose of collecting your data isn't deemed valid anymore, your data will be destroyed.

Use of Thermal Imaging Camera

At the entrance to our property, a Thermal Imaging Camera/Thermometer is used to measure the body temperature and the relevant information is not used for purposes other than the protection of Public Health.

TRANSFERRING OF THE PERSONAL DATA DOMESTICALLY AND INTERNATIONALLY

Personal data may be shared with business and solution partners for the purpose of providing the services by "Orange County Hotels".

"Orange County Hotels" will be entitled to transfer the personal data for certain purposes to the following person and institutions;

- » Business partners of "Orange County Hotels" limited to the purpose of execution of the aims of the establishment of the business partnership,
- » The suppliers of "Orange County Hotels" to the extent of providing the necessary services by our company to fulfill its commercial activities and procured by the supplier as external sources,
- » Solution partners of "Orange County Hotels" limited to ensuring the execution of the commercial activities which require the participation of the affiliates of the company,

"Orange County Hotels" is authorized to transfer the personal data domestically and internationally within the conditions determined by the Board and in compliance with the other provisions in the Law and depending on the consent of the person.

RIGHTS OF THE RELEVANT PERSON

"Orange County Hotels" hereby agrees that the relevant person must provide his/her consent before processing the data within the scope of the

Law and he/she reserves the right to determine the destiny of the data after the data is processed.

Regarding the personal data, the relevant persons holds the right to do the following by applying to our official announced on the web page by “Orange County Hotels”;

- a) To be informed whether his/her personal data are processed or not,
- b) To request information if the personal data are processed,
- c) To learn the purpose of processing the personal data and whether the data are used for the corresponding purposes,
- ç) To get information on the third parties to whom the personal data are transferred in the country and abroad,
- d) In case the personal data are processed incompletely or inaccurately, to request the correction,
- e) To request that personal data are deleted or removed within the framework of the conditions stipulated in article 7,
- f) To request that the processes performed as per clause (d) and (e) are notified to the third parties to whom the personal data are transferred,
- g) To appeal to the negative results against himself/herself arising from the analysis of the data processed exclusively through the automatic systems,
- ğ) In case the personal data are damaged due to the processing of the data contrary to the Law, to request that the damages are indemnified.

Nevertheless, the persons don't reserve any right on the anonymized data within the company. “Orange County Hotels” may share the personal data as required by a juridical function or governmental authority as per the business and contractual relationship.

The owners of the personal data shall submit their requests regarding the above-mentioned rights to the following contact address by completely filling out and putting their wet signatures on the application form given at www.orangecounty.com.tr, the official website of the company, through registered letter with return receipt with the copies of their identity cards (only front page for birth certificate). The applications shall be replied within the shortest time according to the content of the application ow within 30 days at the latest after the delivery to the company. You need to apply with registered letter with return receipt. Besides, only the questions about you shall be replied and any applications made regarding your spouse, relative or friends shall not be accepted. “Orange County Hotels” can only request information and document from the application holders.

CONFIDENTIALITY PRINCIPLE

The data of the employees and other persons within “Orange County Hotels” are confidential. Nobody can use, copy, reproduce, transfer these data for other purposes apart from the business purposes.

PROCESS SECURITY

All necessary technical and administrative measures are taken to protect the personal data received by “Orange County Hotels” and to prevent the retention of them by unauthorized persons and to prevent the damage on our customers and potential customers. Within this framework, it’s ensured that the software complies with the standards, third parties are selected with care and data protection policy is followed within the company.

INSPECTION

“Orange County Hotels” carries out the internal and external inspections for protection of the personal data.

NOTIFICATION OF VIOLATIONS

“Orange County Hotels” shall immediately act to remedy the violations in case a violation of personal data is notified. It shall mitigate or indemnify the damage of the relevant person. In case the personal data are obtained by the unauthorized persons, this case should be immediately notified to the Board of Personal Data Protection.

Regarding the notification of the violations, you can also make an application as per the procedures provided at <https://www.orangecounty.com.tr/en/kvkk>

Requests made pursuant to the Act on the Protection of Personal Data As announced on <https://www.orangecounty.com.tr/en/kvkk> to put your application into process, please complete the form on the websites, attach a copy of your identity card, and send it to the address written on the form via registered mail.

The rights concerning personal data will only be used for one's own data. Requests regarding the personal data of others will not be taken into

consideration. Forms without identity card photocopies will not be taken into consideration. Please be informed that even if data deletion requests are fulfilled, we are required to share data with the authorities if requested.

[Click for application form](#)

VERBIS (DATA SUPERVISOR INFORMATION)

You can access Data Supervisor Information that were notified to the Personal Data Protection Board by “Orange County Hotels” from the following links.

[TOROS-HAN RESTAURANT TURİZM SANAYİ VE TİCARET A.Ş.](#)

CHANGES TO BE MADE IN PERSONAL DATA PROTECTION AND PRIVACY POLICY:

Orange County Hotels reserves the right to make changes on the declarations here.

There is a link attached on the homepage of the website to access the up-to-date ‘Personal Data Protection and Privacy Policy’.

When the last time this Policy was updated and update number are given at the end of this text.

Each change made on the Policy becomes effective upon the publication of the changed declaration on the website.

By using the website or any of our products and services following such changes, you accept the changed declaration that is effective at that time.

Policy Update: 25 09 2020

CONTACT

You can contact us for further questions on the confidentiality agreement by using the following contact information.

Orange County Hotels

Head Office

Aspendos Bulvarı Mehmetçik Mah. No:89 Nar Plaza B blok Kat 3

07300 Muratpaşa / Antalya

TURKEY