



CROWNE PLAZA İSTANBUL ASIA HOTEL – VIA OTELCİLİK YÖNETİMLERİ A.Ş. PERSONAL DATA PROTECTION AND PROCESSING POLICY

PART 1

1.1. PURPOSE AND SCOPE OF THE POLICY

Law No. 6698 on the Protection of Personal Data, which entered into force in 2016 after the protection of personal data became a constitutional right in 2010, is a legal protection that shows the procedures and principles on this subject, which has been developed in order to protect the principle of privacy during the processing of personal data and to prevent damage to fundamental rights and freedoms.

Pursuant to Article 16 of Law No. 6698 ("KVKK" or "Law"), data controllers who are obliged to register with the Data Controllers Registry are obliged to prepare a Personal Data Protection and Processing Policy in accordance with the personal data processing inventory.

This Personal Data Protection and Processing Policy Crowne Plaza Istanbul Asia Hotel - Via Otelcilik Yönetimleri A.Ş. has been prepared in order to determine the procedures and principles to be applied by our Company regarding the protection and processing of personal data in accordance with Law No. 6698 and other legislation.

1.2. DEFINITIONS

Registry; the registry of data controllers called VERBIS kept by the Personal Data Protection Authority.

Explicit Consent; a declaration of consent on a specific subject, based on information and expressed with free will.

Data Recording System is the recording system where personal data is structured and processed according to certain criteria.

Data Controller is the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

Relevant User; persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except for the person or unit responsible for the technical storage, protection and backup of the data.

Recipient Group is the category of natural or legal person to whom personal data is transferred by the data controller.

Data Subject is the natural person whose personal data is processed.

Inventory is the inventory that data controllers create by associating the personal data processing activities they carry out depending on their business processes with the personal data processing purposes and legal grounds, data category, transferred recipient group and data subject group, and detail the maximum retention period required for the purposes for which personal data are processed, personal data foreseen to be transferred to foreign countries and the measures taken regarding data security.

The reason for the obligation to prepare an inventory is to ensure compliance with the Law and the relevant legislation in all processes related to the activities of data controllers, in other words, to ensure that it can be easily determined whether there is a personal data processing situation contrary to the Law. Thus, the data controller will be able to perform a kind of self-auditing process regarding the compliance of personal data processing activities with the Law and the relevant legislation. According to the Regulation on the Data Controllers' Registry, Crowne Plaza Istanbul Asia Hotel, as a minimum in the inventory;

- ❖ Data category,
- ❖ Purposes and legal grounds for processing personal data,
- ❖ Transferred recipient/recipient groups,
- ❖ Data subject groups,
- ❖ Maximum retention period of personal data necessary for the purposes for which they are processed,
- ❖ Personal data foreseen to be transferred to foreign countries,
- ❖ Technical and administrative measures taken regarding data security are included.

PART 2

2.1. CONDITIONS FOR PROCESSING PERSONAL DATA

Processing of personal data is defined in Article 3 of the Law. Accordingly, as the data controller Crowne Plaza Istanbul Asia Hotel, we, as the data controller Crowne Plaza Istanbul Asia Hotel, accept all kinds of operations performed on personal data, such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system, as the processing of personal data.

The conditions for processing personal data are listed in Article 5 of the Law. We act accordingly and process personal data legally in the presence of at least one of the following conditions.

- ❖ Explicit consent of the person concerned,
- ❖ Explicitly stipulated in the law,
- ❖ It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid,
- ❖ It is necessary to process personal data of the parties to a contract, provided that it is directly related to the conclusion or performance of the contract,
- ❖ It is mandatory for the data controller to fulfill its legal obligation,
- ❖ It has been made public by the person concerned,
- ❖ Data processing is mandatory for the establishment, exercise or protection of a right,
- ❖ Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

The conditions for the processing of personal data, i.e. the cases of compliance with the law, are determined by enumeration in the Law and these conditions cannot be expanded.

As the Company as the Data Controller, we process data by meeting the conditions listed above.

2.2. EXPLICIT CONSENT

As the Data Controller, the Company first evaluates whether one of the other data processing conditions can be relied upon in the realization of the data processing activity, and if none of these are available, we resort to obtaining the explicit consent of the data subject.

2.3. EXPLICIT PROVISION IN THE LAW

One of the conditions for data processing is that it is explicitly stipulated in the laws. A provision in the laws stipulating that personal data may be processed will constitute a data processing condition. For example, the processing of data regarding the fingerprinting of suspects by law enforcement officers due to a criminal investigation pursuant to Article 5 of the Police Duties and Powers Law No. 2559 (PVSK) is within this scope.

2.4. ACTUAL IMPOSSIBILITY

The personal data of a person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid may be processed if it is mandatory for the protection of his/her or someone else's life or physical integrity.

2.5. NECESSITY FOR THE CONCLUSION AND PERFORMANCE OF THE CONTRACT

Provided that it is directly related to the establishment or performance of a contract, it is possible to process the personal data of the relevant persons limited to this purpose if it is mandatory to process the personal data of the parties to the contract.

2.6. MANDATORY FOR THE DATA CONTROLLER TO FULFILL ITS LEGAL OBLIGATION

Personal data of the data subject may be processed in cases where data processing is mandatory for the data controller to fulfill its legal obligation.

As Crowne Plaza Istanbul Asia Hotel, obtaining and processing data such as the employee's bank account number, dependents, whether his/her spouse is working or not, social insurance number in order to pay salaries to employees can be given as an example.

As an employer, submitting the information of our employees to the examination of the relevant public officials during tax audits can also be evaluated within this scope.

2.7. PUBLICIZATION OF PERSONAL DATA BY THE DATA SUBJECT

Personal data that are made public by the data subject himself/herself, in other words, disclosed to the public in any way, may be processed. An example of this situation is when a person publicly announces his/her contact information in order to be contacted in certain circumstances. Publicization can also be mentioned in the event that the workplace telephone numbers and corporate e-mail addresses of employees are shared on corporate websites in a way that is accessible to third parties. However, in order for personal data to be considered public, the person to whom it belongs must want it to be public. In other words, in order for publicization to take place, there must be a will to make it public.

These reasons, in principle, do not perceive the fact that a person's personal data is in a place where everyone can see it as publicizing, and accepts that the person makes the data public only for that purpose.

2.8. PROCESSING OF PERSONAL DATA IS MANDATORY FOR THE ESTABLISHMENT OR EXERCISE OF A RIGHT

It is possible to process the personal data of the person concerned if it is mandatory for the establishment, exercise or protection of a right. In addition, after the contracts we have established as Crowne Plaza Istanbul Asia Hotel are terminated, the storage of documents such as invoices, contracts, surety bonds for these purposes until the end of the statute of limitations against possible legal proceedings will be considered within this scope.

2.9. DATA PROCESSING IS MANDATORY FOR THE LEGITIMATE INTERESTS OF THE DATA CONTROLLER, PROVIDED THAT IT DOES NOT HARM THE FUNDAMENTAL RIGHTS AND FREEDOMS OF THE DATA SUBJECT

Provided that it does not harm the fundamental rights and freedoms of the data subject, it is possible to process personal data if data processing is mandatory for the legitimate interests of the data controller. In some cases, data processing may be in question for the legitimate interest of the data controller. For example, provided that it does not harm the fundamental rights and freedoms of our employees, we consider the processing of personal data of our employees to be taken as a basis for their promotions, salary increases or social rights or for the distribution of duties and roles in the process of restructuring the enterprise within the scope of the legitimate interest of the data controller.

PART 3

3.1. BASIC PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Crowne Plaza Istanbul Asia Hotel adopts the following basic principles within the scope of ensuring and maintaining compliance with the personal data protection legislation.

There are basic principles regarding the processing of personal data that are accepted in international documents and reflected in many country practices. In Article 4 of the Law, the procedures and principles regarding the processing of personal data are regulated in parallel with Convention No. 108 and European Union Directive 95/46/EC.

Accordingly; the general (basic) principles enumerated in the processing of personal data in the Law are as follows:

- ❖ Compliance with the law and good faith,
- ❖ Being accurate and up to date when necessary,
- ❖ Processing for specific, explicit and legitimate purposes,
- ❖ Being relevant, limited and proportionate to the purpose for which they are processed,
- ❖ Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

The principles regarding the processing of personal data should be at the core of all personal data processing activities and all personal data processing activities should be carried out in accordance with these principles.

3.1.1. The Principle of Compliance with the Law and Good Faith

Compliance with the law and the rule of good faith refers to the obligation to act in accordance with the principles



introduced by laws and other legal regulations in the processing of personal data. In accordance with the principle of compliance with the rule of good faith, Crowne Plaza Istanbul Asia Hotel always takes into account the interests and reasonable expectations of the data subjects while trying to achieve our goals in data processing. In addition, in principle, we act in a way that prevents the emergence of consequences that the data subject does not expect and should not expect. In accordance with the aforementioned principle, we also act in accordance with the transparency of the data processing activity in question for the data subject and the information and warning obligations of Crowne Plaza Istanbul Asia Hotel.

3.1.2. The Principle of Being Accurate and Up-to-Date When Necessary

As Crowne Plaza Istanbul Asia Hotel, we are aware that we have an active duty of care to ensure that personal data is accurate and, where necessary, up-to-date. Accordingly, we always keep the channels open to ensure that the relevant person's information is accurate and up-to-date.

3.1.3. Processing for Specific, Explicit and Legitimate Purposes

The principle that the purposes of processing personal data are specific, legitimate and clear;

- The personal data processing activities are clearly understandable by the data subject,
- Determination of the legal processing conditions on the basis of which personal data processing activities are carried out,
- It ensures that the personal data processing activity and the purpose of this activity are set out in detail to ensure the determination.

In this respect, as Crowne Plaza Istanbul Asia Hotel, we, as Crowne Plaza Istanbul Asia Hotel, show a high sensitivity in compliance with the principle of certainty and clarity in legal transactions and texts (explicit consent, disclosure, answering the applications of the data subject, application to the data controller registry) in which the purposes of personal data processing are explained, and we keep the use of technical-legal terminology to a minimum level in order to be easily understood by everyone while presenting the legal texts in question to the other party. Compliance with this principle is also important in terms of compliance with the principle of honesty.

3.1.4. The Principle of Being Relevant, Limited and Proportionate to the Purpose for which they are Processed

As Crowne Plaza Istanbul Asia Hotel, we, as Crowne Plaza Istanbul Asia Hotel, ensure that the processed data is suitable for the realization of the specified purposes, and we avoid unnecessary processing of personal data that is not related to the realization of the purpose or is not needed. At this point, we process a minimum level of personal data in order to serve the specified purpose. Likewise, we do not process data in order to meet the needs that may arise later. In addition, the processed data will be limited only to the personal data required for the realization of the purpose. In principle, Crowne Plaza Istanbul Asia Hotel avoids data processing that is not necessary for the purpose other than this, after providing sufficient data to fulfill the purpose.

3.1.5. The Principle of Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

Crowne Plaza Istanbul Asia Hotel retains personal data for the period required for the purpose for which they are processed as a requirement of the "purpose limitation principle". As stated in Article 12 of the Law, the data controller is obliged to take all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to ensure the preservation of personal data. In this regard, as Crowne Plaza Istanbul Asia Hotel, we are aware that we are obliged to take administrative and technical measures.

In addition to the retention periods determined as Crowne Plaza Istanbul Asia Hotel in accordance with the principle of limitation of purpose for the storage of personal data, we also have retention periods determined within the scope of the relevant legislation to which we are subject. Accordingly; if there is a period stipulated in the legislation for the relevant personal data, we will comply with this period; if no such period is stipulated, we store the data only for the period required for the purpose for which they are processed.

If there is no valid reason for further storage of a data, that data will be deleted or destroyed.



It has been mentioned above that personal data cannot be retained by considering that it can be reused in the future or for any other reason.

In addition, as the Hotel, while applying for registration to the registry in accordance with Article 16 of the Law, we have determined the maximum period required for the purpose of processing personal data, taking into account Article 9 of the Regulation on the Registry of Data Controllers, and the required periods have been published in our legal texts.

PART 4

4.1. PROCESSING CONDITIONS OF SENSITIVE PERSONAL DATA

Sensitive personal data are data that, if learned, may cause discrimination or victimization of the person concerned. For this reason, as Crowne Plaza Istanbul Asia Hotel (Via Hotel), we are aware that the protection and processing of such data should be protected much more strictly than other personal data. As a matter of fact, the Law attributes a special importance to these data and introduces a different regulation regarding these data. The Law recognizes them as special categories of personal data or sensitive data. Special categories of personal data may be processed with the explicit consent of the data subject or in limited cases listed in the Law. According to the Law, as Via Otel, we process sensitive personal data with the explicit consent of the data subject. However, according to the Law, the processing of sensitive personal data is also possible in the following cases other than the explicit consent of the data subject:

- Sensitive personal data other than health and sexual life, only in cases stipulated by law,
- Personal data relating to health and sexual life may only be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

PART 5

5.1. PERSONAL DATA CATEGORIES

A) Identity Data

Personal data containing information about the identity of the person; documents such as driver's license, identity card and passport containing information such as name, surname, Turkish ID number, nationality, mother's name, father's name, place of birth, date of birth, gender, and information such as tax number, SSI number, signature information, vehicle license plate, etc.

B) Contact Data

Contact information is personal data such as telephone number, address, e-mail address, fax number.

C) Personal Data

As Via Hotel, all kinds of personal data entered into the personal files of our employees within the scope of the Labor Law.

D) Legal Transaction Data

Personal data processed within the scope of determination and follow-up of Crowne Plaza Istanbul Asia Hotel's legal receivables and rights and performance of its debts and compliance with legal obligations and the Company's policies.

E) Customer Transaction Data

Personal data belonging to our guests staying in our hotel or real persons who benefit from our meetings, invitations, spa and similar services.

F) Physical Space Security Data

Personal data regarding the records and documents taken at the entrance to the premises of our hotel and during the stay in the physical space; camera records and records taken at the security point.

G) Transaction Security Data

Personal data processed to ensure the technical, administrative and legal security of the data subject while Via Otelcilik carries out its activities.

H) Risk Management Data

Personal data processed through methods used in accordance with generally accepted legal, customary and honesty rules in these areas for the management of technical and administrative risks.

I) Finance Data

Personal data processed regarding information, documents and records showing all kinds of financial results created within the scope of the legal relationship between Crowne Plaza Istanbul Asia Hotel and the person concerned, and personal data such as bank account number, IBAN number, credit card information, financial profile, asset data, income information.

J) Professional Experience Data

Personal data relating to education, certificates, diplomas and similar professional experience.

K) Marketing Data

It refers to personal data related to satisfaction surveys regarding our guests or service recipients, marketing information and analysis studies obtained from our potential service recipients in events, fairs and similar organizations.

L) Audiovisual Recording Data

It refers to photographs, videos, sound recordings and similar visual and audio recordings. In our company, for example; visual or auditory personal data of employee candidates and employees through the job application form, and of our service recipients in case of photo shooting or video recording in organizations and invitations can be processed.

M) Special Categories of Personal Data

Data such as health data, including blood type, religion, criminal record and criminal conviction information specified in Article 6 of the Law. In our company, health data and criminal record information of employees are processed as special quality data.

N) Employee Candidate Data

Refers to personal data on employee candidates obtained through documents such as interviews with employee and intern candidates and resumes submitted for the purpose of establishing an employment contract.

O) Family Member Data

Personal data relating to the family members of employees in cases such as the provision of fringe benefits such as family subsistence allowance provided to employees and obtaining emergency contact information.

P) Request / Complaint Management Data

Personal data regarding the receipt and evaluation of any requests or complaints directed to our hotel.

PART 6

6.1. DISCLOSURE TO DATA SUBJECTS (PERSONAL DATA SUBJECTS)

Crowne Plaza Istanbul Asia Hotel carries out the necessary processes to ensure that data subjects are informed during the acquisition of personal data in accordance with Article 10 of the Law and the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform. In this context, the clarification texts provided by the Hotel to the data subjects include the following;

- ❖ The identity of our Data Controller Company, in this context, our full title, address and contact information,
- ❖ The purposes for which personal data will be processed,
- ❖ To whom and for what purposes the processed personal data may be transferred,
- ❖ Method and legal grounds for collecting personal data,
- ❖ Rights of the data subject;
 - To learn whether their personal data is being processed,
 - To request information if personal data has been processed,
 - To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
 - To know the third parties to whom personal data is transferred domestically or abroad,
 - To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction to third parties to whom personal data is transferred,
 - To request the deletion or destruction of personal data within the framework of the stipulated conditions and to request notification of the transaction to third parties to whom personal data is transferred,
 - To object to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
 - In case of damage due to unlawful processing of personal data, they have the right to demand compensation for the damage.

It is one of our basic principles to fulfill our disclosure obligation to the data subject fully and accurately by taking



into account the necessary procedures and principles.

6.2. FINALIZATION OF THE REQUESTS OF THE PERSONS CONCERNED

In the event that the data subjects submit their requests regarding their personal data to Crowne Plaza Istanbul Asia Hotel in writing or by other methods determined by the PDP Board, the requests submitted by the data subject to us in order to exercise any right written in Article 11 of the Law in accordance with Article 13 of the Law as the Company data controller are finalized within 30 (thirty) days at the latest and the data subject is informed.

Data subjects should make their requests regarding their personal data in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller.

Crowne Plaza Istanbul Asia Hotel may request information to determine whether the applicant is the owner of the personal data subject to the application within the scope of ensuring data security. In addition, in order to ensure that the application of the personal data owner is finalized in accordance with the request, the personal data owner may ask questions about the application.

PART 7

7.1. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

Crowne Plaza Istanbul Asia Hotel takes all necessary measures to prevent unlawful disclosure, access, transfer of personal data or security deficiencies that may occur in other ways, according to the nature of the data to be protected within the means of our company. In this context, necessary administrative and technical measures are taken by the hotel, an audit system is established within the Hotel and in case of unlawful disclosure of personal data, the measures stipulated in the Law are acted in accordance with.

A. Administrative Measures Taken by Crowne Plaza Istanbul Asia Hotel to Ensure Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data

- ❖ The Company limits internal access to the stored personal data to the personnel who are required to access it due to their job description. In limiting access, whether the data is of special nature and the degree of importance are also taken into consideration.
- ❖ In case the processed personal data is obtained by others through unlawful means, this situation is notified to the relevant person and the Board as soon as possible.
- ❖ Regarding the sharing of personal data, it signs a framework agreement on the protection of personal data and data security with the persons with whom personal data is shared, or data security is ensured with the provisions added to the existing agreement.
- ❖ Employs personnel who are knowledgeable and experienced in the processing of personal data and provides necessary trainings to its personnel within the scope of personal data protection legislation and data security.
- ❖ Carries out and has carried out the necessary audits in order to ensure the implementation of the provisions of the Law within its own legal entity. Confidentiality and security weaknesses that arise as a result of the audits are eliminated.

B. Technical Measures Taken by the Data Controller Crowne Plaza Istanbul Asia Hotel to Ensure Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data

- ❖ Necessary internal controls are carried out within the scope of the established systems.
- ❖ Within the scope of the established systems, information technologies risk assessment and business impact analysis processes are carried out.
- ❖ It is ensured that the technical infrastructure to prevent or monitor the leakage of data outside the organization is provided and the relevant matrices are created.
- ❖ Control of system vulnerabilities is ensured by obtaining penetration testing services on a regular basis and when the need arises.
- ❖ It is ensured that the access authorizations of employees working in information technology units to personal data are kept under control.
- ❖ Destruction of personal data is ensured in a way that cannot be recycled and leaves no audit trail.
- ❖ Pursuant to Article 12 of the Law, all kinds of digital media where personal data are stored are protected by encrypted or cryptographic methods to ensure information security requirements.

C. Enforcement

This policy has entered into force as of the date of publication and is updated annually within the framework of the procedures and principles set out above.