

Data Protection Notice

Data Controller: Adilbey Holding A.Ş.

Address: Bodrum Branch, Kaynar Mevkii 48400 Bodrum, Muğla, Turkey.

As "Nikki Beach" (Adilbey Holding A.Ş. Bodrum Branch), we approach the matter of securing and processing the personal data entrusted to our Company, within the framework of applicable legislation, foremost the Law on the Protection of Personal Data No. 6698 ("KVKK" or "Law"), the Constitution of the Republic of Turkey and relevant international conventions on human rights that our country is a party to, sensitively. This Data Protection Notice has been prepared to inform you regarding our activities within the scope of the Law.

As a customer, supplier, contractor, business associate, visitor, employee or applicant for employment, the personal data you share with our Company is processed, and maybe transferred to domestic and foreign third persons within the scope of our activities and purposes for processing, and in compliance with the Law.

Categories of Personal Data Collected, and Purposes of Processing

We collect the following categories of personal data within the scope of our lodging and tourism services:

1. Identity Information
2. Contact Information
3. Information Regarding Family Members
4. Financial Information
5. Employment Information

Category	Identity Information
Description	Information relating to a person's identity.
Collected from	Customers, suppliers, business associates, employees, employees, applicants for employment, contractors and third parties we collaborate with.
Content	Name, surname, ID number, passport number, vehicle license plate number, etc.
Purpose of Processing	We collect our customers' identity information as required by applicable legislation, and for the purpose of ensuring security. We are obligated to collect and retain our employees' identity information as required by applicable labour and social security legislation. We collect the identity information of our suppliers, contractors and other persons we are engaged in a similar business relationship with to the extent it is required within the scope of our commercial relationship, and in order to perform our contractual obligations, if any.
Legal basis	The primary purpose of processing is to meet our obligations per applicable legislation. Additionally, identity information is processed within the scope of our contractual relationship with the data subject. Occasionally, identity information is processed to the

extent necessary for our legitimate interests (for instance, to adhere by our corporate principle of providing a secure and pleasant experience, we collect the identity information of all individuals who make a daily visit to our premises; we conduct customer satisfaction surveys).

Method of Collection We gather such information via printed forms, and occasionally via electronic forms.

Category	Contact Information
Description	Personal information required in order to communicate with a person.
Collected from	Customers, suppliers, business associates, employees, applicants for employment, contractors and third parties we collaborate with.
Content	Home and work address, mobile phone number, home phone number, postal address, e-mail address, etc.
Purpose of Processing	<p>We collect our customers' contact information in order to ensure the security of our guests; for the purpose of advertising and to keep you informed of our special offers and promotions; to render our lodging services, and per our obligations under applicable legislation.</p> <p>We are obligated to collect and retain our employees' contact information as required by applicable labour and social security legislation.</p> <p>We collect the contact information of our suppliers, contractors and other persons we are engaged in a similar business relationship with to the extent it is required within the scope of our commercial relationship, and in order to perform our contractual obligations, if any.</p>
Legal basis	<p>The primary purpose of processing is to meet our obligations per applicable legislation. Additionally, contact information is processed within the scope of our contractual relationship with the data subject. Occasionally, contact information is processed to the extent necessary for our legitimate interests (for instance, to adhere by our corporate principle of providing a secure and pleasant experience, we collect the identity information of all individuals who make a daily visit to our premises; we conduct customer satisfaction surveys).</p>
Method of Collection	We gather such information via printed forms, and occasionally via electronic forms.

Category	Information Regarding Family Members
Description	Personal information relating to a person's family members.

Collected from	Customers and employees.
Content	Name, surname, ID number, passport number, home and work address, mobile phone number, postal address, e-mail address, etc.
Purpose of Processing	We collect information regarding the family members of our customers per our obligations under the applicable legislation, and in order to ensure the safety of our guests. We are obligated to collect and retain information regarding our employees' family members to the extent required by applicable labour and social security legislation.
Legal basis	The primary purpose of processing is to meet our obligations per applicable legislation. Additionally, information regarding family members is processed within the scope of our contractual relationship with the data subject. Occasionally, information regarding family members is processed to the extent necessary for our legitimate interests (for instance, in order to contact in case of emergencies).
Method of Collection	We gather such information via printed forms, and occasionally via electronic forms.

Category	Financial Information
Description	Information required for the processing of payments, or relating to the finances of the data subject.
Collected from	Customers, employees and third parties we collaborate with.
Content	Salary, document of authorized signature, bank account details, billing information, information related to taxation etc.
Purpose of Processing	We collect our customers' financial data to meet our obligations under the applicable legislation, and in order to render our services. We are obligated to collect and retain the financial information to the extent required by applicable labour and social security legislation. We collect the financial information of our suppliers, contractors and other persons we are engaged in a similar business relationship with to the extent it is required within the scope of our commercial relationship, and in order to perform our contractual obligations, if any.
Legal basis	The primary purpose of processing is to meet our obligations per applicable legislation. Additionally, financial information is processed within the scope of our contractual relationship with the data subject. Occasionally, financial information is processed to the extent necessary for our legitimate interests (for instance, in order to ensure ease of payment with our frequent guests).
Method of Collection	We gather such information via printed forms, and occasionally via electronic forms.

Category	Employment Information
Description	Information required within the scope of an employment relationship.
Collected from	Employees and applicants for employment.
Content	Identity information, contact information, financial information, sex, height and weight, social security number, blood type, documents relating to family status, residence address, bank account details, proof of address, documents from previous employer, criminal record, curriculum vitae, military service status, disability status, information required for tax exemption, insurance information, accommodation and rent information, foreign language proficiency, education status, vocational information, previous address, signature, etc.
Purpose of Processing	We collect our employees' information as required by the employment contract, applicable legislation, and per our legitimate interests. We collect such information from applicants for employment to the extent necessary for the evaluation of their suitability for employment.
Legal basis	The primary purpose of processing is to meet our obligations per applicable legislation, and the execution of the employment contract. Occasionally, employment information is processed to the extent necessary for our legitimate interests (for instance, insurance purposes, contact in case of emergencies, placing applicants in other suitable positions).
Method of Collection	We gather such information via printed forms, and occasionally via electronic forms.

Transferring of Your Personal Data

Your personal data may be transferred at home and abroad for the above-mentioned purposes, in compliance with the Law and other applicable legislation, to our affiliate partners and related entities/group companies, as well as our business partners, other business associates, subcontractors for the purpose of rendering our services, or with supervisory institutions and official authorities where stipulated by law.

Your personal data shall only be transferred abroad,

- Provided you have given your explicit consent, or
- Where one of the conditions laid out in Article 5(2) or Article 6(3) of the Law is met, and the destination country offers adequate protection of personal data, or
- Where one of the conditions laid out in Article 5(2) or Article 6(3) of the Law is met, and there is a written statement, approved by the Data Protection Authority, by both the data controller established in Turkey and the party that shall receive the personal data in the third country.

Your Rights as a Data Subject

Within the framework of the Law and other applicable legislation, you have the right to

- learn whether your personal data are being processed,
- request information in case your personal data has been processed,

- find out the reason for processing of your personal data and whether they are processed accordingly,
- learn about the domestic and foreign third parties who have received your personal data,
- demand the correction of your personal data if such data is incomplete or faulty,
- demand the deletion or destruction of your personal data to the extent permitted by the Law,
- demand that the third persons your personal data is transferred to is notified pursuant to your demand for correction or deletion of your personal data,
- object to a decision taken against you based solely on automatic processing,
- demand compensation should you suffer a loss due to the processing of your personal data in breach of the law
- withdraw your explicit consent for the processing or transfer of personal data without reason, and at any time
- apply to the Data Protection Authority within 30 days of the rejection of your application to our Company regarding the exercise of any of your rights listed above, and within 60 days of your application in any case.

You can send your written request with wet signature to the address of Kaynar Mevkii 48400 Bodrum/Muğla, with secure electronic signature to the registered electronic mail address adilbey@hs02.kep.tr, or by any other means postulated by the Data Protection Authority.

In the application which you will file to exercise the above-specified rights as a personal data owner, and which shall include elaborations regarding the right you wish to exercise, the subject matter of your request must be clear and comprehensible, your application must relate to you as the data subject, or in the case you act on behalf of any other person, you must be specially authorized in this regard, and documents proving such authorization must be submitted, and your application must include details of identity and your address, along with documents certifying your identity.

Your application shall be evaluated and finalized within 30 days. Should your application be rejected, the reasons for such rejection shall be communicated to you at the address or e-mail address you specify in your application. We reserve the right to reject your application should the information or documentation you provide with your application prove to be false, or if you are not authorized to make such an application.

Retention Periods of Your Personal Data

The retention periods of your personal data is as follows:

- If a minimum period of retention has been stipulated by the Law or other applicable legislation, your personal data shall be retained for at least this period of time.
- In consideration of a possible situation where the official request of a Court of competent authority or an administrative body is received by our Company with a delay, or a possible situation where a dispute may arise to which we are a party, a period of 6 months to a year is added to any minimum retention period stipulated by Law, after which your personal data shall be deleted, destroyed or anonymized.
- If a minimum period of retention is not stipulated by applicable legislation, your data shall be retained for the period of time determined in the applicable contract. Upon the termination of said contract, or when your data is no longer necessary, your data shall automatically be deleted, destroyed or anonymized without the requirement of further action from your part.
- Should you demand the deletion or destruction of your data prior to the lapse of the legally mandated minimum period of retention, your demand shall be rejected. If a minimum period

of retention is not stipulated by applicable legislation, should you demand the deletion or destruction of your personal data, your personal data shall be deleted, destroyed or anonymized on the first date of periodic deletion, or within 6 months the latest.