

## PREMIST CLARIFICATION TEXT

Inma Tur. Ins. Teks. San. Ve Tic. Ltd. Sti. (“Premist”, “Company”) shows maximum care for the security of your personal data. Premist, processes the personal data of its customers, if customers are legal entities, their employees' and authorities' several personal data within the scope of their commercial relationship and services provided to its customers. The purpose of this clarification text is to fulfill the obligation of clarification against our dear valued customers within the scope of the Law on Protection of Personal Data No. 6698 (“Law”, "KVKK").

### 1. DATA CONTROLLER IDENTITY

Premist acts as a data controller within the scope of KVKK. Premist's contact information is below:

Central Registration System No : 0478051679900017

Internet Address : www.premisthotels.com

Phone Number : 0212 455 84 24/25/26

E-Mail Address : muhasebe@premishotels.com

Address : Cankurtaran Mah.Ishakpaşa Cad.no:12/14/16 Fatih/Istanbul

### 2. CATEGORIES OF PERSONAL DATA BEING PROCESSED CUSTOMERS:

Data Categorization	Explanation
<b>Identification</b>	Name, surname, date and place of birth, photocopy of ID/passport, name of parents, T.R. ID/passport number,nationality,signature
<b>Contact Information</b>	Telephone number, full address information, e-mail address
<b>Customer Transaction Information</b>	The date of arrival and departure at the hotel, room number and number of days, information about the people who is with the customer (name-surname, degree of relationship, etc.), room type, records of guests which display inappropriate behavior
<b>Financial Information</b>	Information on the invoice, bank account information, credit card information
<b>Legal Transaction</b>	Documents which can be used in the process of a possible lawsuit/execution (correspondence, etc.)
<b>Visual Information</b>	Camera record
<b>Demand/Complaint Management Information</b>	Information and records collected about complaints and/or requests made by a person about products and services
<b>Reputation Management Information</b>	Complaint information received/collected through the internet and social media; action information for complaints received/collected from online channels.

### 3. PURPOSES AND LEGAL REASONS OF PROCESSING OF PERSONAL DATA

Personal data of customers are processed for the following purposes:

- The execution or performance of the contract/business relationship between customer and the Company,
- Providing accommodation services to customers,

- For the performance of our legal obligations ( to perform our other legal obligations to competent institutions and organizations, the use of all kinds of lawsuit, answer, and objection rights against official institutions and organizations such as the court, the execution office, the arbitration committee in legal disputes, conducting negotiation and settlement processes regarding disputes, performing notification processes, if customers request information from the Company, the necessary information can be delivered to the customer, determining suspicious transactions and illegal uses),
- Planning, supervision and execution of information security processes,
- Supervision of physical places and fulfillment of security,
- Conduct of communication activities,
- Development of products and services, providing rights and benefits to customers in accordance with the activities developed in relation to the use of products / services,
- Performance of activities in accordance with the legislation
- Maintaining and developing intracompany activities, implementing the necessary procedures in process, conducting accounting and financial business / transactions, execution and follow-up of our business relationship, completion of payments and collection processes, performance of current account and BA/BS reconciliations,
- Execution of customer accommodation processes,
- Providing request/complaint/suggestion tracking and reputation management, sending a commercial electronic message to the customers if the customer gives their consent and lastly your data are processed in accordance with the conditions in Article 5 of the KVKK in order to provide promotion and notifying regarding the services provided by our Company.

In the above scope, according to Article 5/2 of the KVKK the data which belong to the customers are processed for the legal reasons of “the requirement of processing for execution or performance of a contract “, "the requirement of processing for legitimate interest of data controller”, “it is expressly provided for by the laws”, “ necessity of processing for compliance with a legal obligation to which the data controller is subject”, “necessity of processing for the establishment, exercise or protection of any right.” and " explicit consent of the customers”.

#### **4. TO WHOM AND FOR WHAT PURPOSES THE PROCESSED PERSONAL DATA MAY BE TRANSFERRED**

The personal data of customers, in line with the realization of the above-mentioned purposes and limited to the fulfillment of these purposes; may be transferred to our third-party service providers located in Turkey and/or abroad, (suppliers who provide product/hosting services regarding the software(s) used, e-mail server service, e-archive and e-invoice billing service providers, lawyers, financial advisors), our business/solution partners, affiliates, shareholders, company officials and suppliers.

In addition, in order to fulfill our legal notification, declaration, supervision and other obligations, conducting judicial/official correspondences, execution of legal disputes, exercise of our legal rights, such as litigation and response rights, the information requested from us may be transferred to official institutions and organizations, the courts, the prosecution offices, law enforcers, the Personal Data Protection Board and other judicial/administrative authorities.

#### **5. METHOD AND LEGAL REASON OF COLLECTİNG PERSONAL DATA**

Your personal data are collected through company web address, mobile applications, social media accounts, email address such as electronic/digital media directly from customers; in accordance with the correct use of the services and the needs of customers in order to the realization of the necessary improvements in the services from customers, the services that the customer uses and the potential consumer candidates; through our solution partners and other business partners who ensure that our Company's services are used by our customers; through written or electronic channels, including fax, notifications from administrative and judicial authorities and other communication channels, contracts, camera systems.

Your personal data may be collected for the following legal causes according to Article 5 and 6 of the KVKK:

- Within the scope of the execution or performance of the service contract, providing accommodation services to customers and execution of customer accommodation processes for the legal reasons of “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.”, “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.” and “necessity of processing for the establishment, exercise or protection of any right”,
- Regarding the performance of our legal obligations, Performance of activities in accordance with the legislation and other judicial processes for the legal reasons of “it is necessary for compliance with a legal obligation to which the data controller is subject.”, “it is expressly provided for by the laws”, “necessity of processing for the establishment, exercise or protection of any right” and “the requirement of processing for legitimate interest of data controller”,
- Regarding planning, supervision and execution of information security processes and supervision of physical places and fulfillment of security for the legal reason of “the requirement of processing for legitimate interest of data controller”,
- Within the scope of conduct of communication activities, maintaining and developing intracompany activities, implementing the necessary procedures in process, conducting accounting and financial business / transactions, execution and follow-up of our business relationship, completion of payments and collection processes, performance of current account and BA/BS reconciliations, providing rights and benefits to customers in accordance with the activities developed in relation to the use of products for the reasons of “it is expressly provided for by the laws”, “necessity of processing for the establishment, exercise or protection of any right” and “the requirement of processing for legitimate interest of data controller”,
- Within the scope of providing request / complaint / suggestion tracking and resolution of customer complaints for the legal reasons of “necessity of processing for the establishment, exercise or protection of any right” and “the requirement of processing for legitimate interest of data controller”,
- Regarding the data processing processes that require your explicit consent for the reason of “explicit consent”. You may terminate your personal data processing activities based on explicit consent by withdrawing your explicit consent at any time and without any justification.

## 6. DATA SUBJECT’S RIGHTS

Personal data subjects have the following rights;

- Right to acknowledge whether the personal data is processed,
- Right to request information on the matter, if the personal data is processed,
- Right to acknowledge the purpose of processing of personal data and whether the personal data is used in accordance with such purpose,
- Right to know the third parties to which the personal data are transmitted domestically or in abroad,
- If the personal data is processed wrongfully or deficiently, right to request for correction of the personal data and to request notification of the transaction performed in this respect to third parties, to which personal data is transferred,
- Request that their personal data are deleted or destroyed, if the reasons for processing are no longer available, even if they are processed in accordance with the provisions of the Law and other related laws, and request that the third persons to whom such data are transferred are informed accordingly,
- Right to object to occurrence of a circumstance against the interest of the data subject, which came to existence as a result of analyzing the processed data exclusively by automatic systems,
- If the data subject incurs any damages due to unlawful processing of personal data, right to request for compensation for the incurred damages.

When you, as the data subjects, submit your requests regarding your rights to our Company with the methods set forth under this Information Note, our Company shall respond to such request without any charge and within 30 days at the latest, depending on the nature of the request. However, if the response will be provided in a recording environment such as CD, flash disk, an amount equal to the cost of the recording environment may be charged. For any query or request concerning your rights set out above, you may send your request in writing to the address of Cankurtaran Mah.Ishakpaşa Cad.no:12/14/16 Fatih/Istanbul or to the address of muhasebe@premishotels.com by using registered electronic mail (KEP) address, secure electronic signature, mobile signature or electronic mail address.