

BH CONFERENCE & AIRPORT HOTEL

POLICY ON THE PROCESSING, PROTECTION, STORAGE AND ANNIHILATION OF PERSONAL DATA

1. INTRODUCTION

1.1 PURPOSE AND SCOPE OF THE POLICY

This Policy on the Processing, Protection, Storage and Annihilation of Personal Data (“**Policy**”), has been prepared by Hayat Otel İşletmeciliği Turizm ve Yatırım Ticaret A.Ş. (hereinafter referred to as the “**Company**”) as the data controller pursuant to the Turkish Personal Data Protection Law numbered 6698 (“**PDPL**”) and its relevant legislation in order to comply with the PDPL, to fulfill our obligations and to inform the data subjects. This Policy sets forth the main principles adopted by the Company relating to processing of personal data.

The personal data of the Company’s employees, potential employees, service providers, visitors and other third parties are within the scope of this Policy and such Policy applies to all recording mediums and activities for processing personal data owned or managed by the Company.

The Company is within the Bilgili Holding Group (You may find the list of companies within Bilgili Holding Group at <http://www.bilgiliholding.com/en/bilgili-group-companies.html>) Therefore, this Policy is a supplement to Bilgili Holding A.Ş.’s Policy on the Processing, Protection, Storage and Annihilation of Personal Data (“**Bilgili Holding Group’s Policy**”), which is in the framework policy for the processing, storage and annihilation of personal data which may be found at <http://www.bilgiliholding.com/i/assets/contents/documents/kvkk/policy.pdf>

1.2 ABBREVIATIONS AND DEFINITIONS

You may find the abbreviations and definitions in Bilgili Holding Group’s policy.

2. MATTERS RELATING TO PROCESSING OF PERSONAL DATA

2.1 PROCESSING PERSONAL DATA IN COMPLIANCE WITH THE PRINCIPLES SET OUT IN THE LEGISLATION

You may find information relating to such principles in Bilgili Holding Group’s policy.

2.2 DATA SUBJECT CATEGORIES

The categories of data subjects whose personal data is processed specifically by the Company are listed in the table below. You may find the other data subject categories whose personal data is being processed in Bilgili Holding Group’s policy.

CATEGORIES OF DATA SUBJECTS	DEFINITIONS
Relatives	Relatives of employees and guests
Guests	Real persons who stay in the hotel operated by the Company
Legal Guardian	Real person who has legal custody of and who represent Guests under -18
Visitors	Real persons who visit the hotel operated by the Company

2.3 PROCESSING CONDITIONS OF PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA

You may find information relating to such processing conditions in Bilgili Holding Group's policy.

2.4 PROCESSING PURPOSES OF PERSONAL DATA

In accordance with Article 10 of the PDPL and its relevant legislation, the Company informs the data subjects and processes their personal data in line with the principles set forth in Article 4 of the PDPL and the general principles determined in the PDPL based on at least one of the personal data processing conditions set forth in Article 5 and 6 of the PDPL and explicit consent when needed to obtain such consent and limited to the personal data processing purposes determined hereinbelow.

In this respect, our Main and Sub-Objectives regarding Personal Data Processing are detailed hereinbelow:

MAIN OBJECTIVES	SUB-OBJECTIVES
To plan and/or to carry out the Company's human resources policies and processes	<ul style="list-style-type: none"> • To plan and effectuate the allowances and benefits of its employees • To plan and carry out internal training activities • To manage salaries • To plan human resources procedures • To carry out recruitment processes • To plan and carry out the appointment, promotion and dismissal processes • To fulfill its obligations towards its employees arising from the employment contracts and relevant legislation
To carry out the necessary works and to plan and/or carry out the Company's business strategies by the respective departments of the Company for the execution of the Company's commercial and operational activities	<ul style="list-style-type: none"> • To manage the relationships with business partners and suppliers • To plan and carry out business activities • To plan and execute the institutional communication activities • To create and manage the IT infrastructure • To implement information security • To follow-up finance and accounting works • To plan and execute events and organizations • To carry out investment relationships • To carry out and follow-up contract negotiations • To advertise new or existing products, services and promotions • To execute marketing activities • To execute strategic planning activities • To plan and carry out the advertisements relating to the Company's activities
To ensure the legal, technical and financial-institutional security of the Company and of those who have a business relationship with the Company	<ul style="list-style-type: none"> • To follow-up legal procedures • To form and follow-up visitor records • To plan and execute the emergency management procedures • To plan and execute occupational health and safety procedures • To ensure that the data are accurate and up to date • To ensure the security of the hotel • To create personal data inventory • To inform the competent public institutions and organizations as well as companies in accordance with the relevant legislation

To carry out the necessary works in order to have the relevant persons benefit from the services provided by the Company	<ul style="list-style-type: none"> • To plan and execute procedures relating to the relationship with Guests • To plan and execute the processes between the Company and Legal Guardians • To carry out the processes relating to the services provided to the Guests
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3. MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA

You may find information relating to the technical and administrative measures taken by the Company in Bilgili Holding Group's policy.

4. RIGHTS OF THE DATA SUBJECTS AND USING THESE RIGHTS

You may find information regarding such matter in Bilgili Holding Group's policy.

5. TRANSFER OF PERSONAL DATA

Our Company can transfer the data subject's personal data and special categories of personal data to third parties (companies, public and private authorities, natural persons) by taking the necessary security measures in accordance with the lawful personal data processing purposes. You may find information regarding such matter in Bilgili Holding Group's policy.

6. STORING AND ANNIHILATING PERSONAL DATA

Personal data of data subjects are stored safely electronically or physically by Bilgili Holding Group as determined in the table below in accordance with the limits specified in the PDPL and other relevant legislation for the purposes determined above and especially in order to (i) carry out its business activities, (ii) fulfill its legal obligations, (iii) determine and fulfill its obligations relating to its employee's rights and benefits, and (iv) manage its relationships with its customers. You may find information regarding such matter in Bilgili Holding Group's policy. The table relating to the storage and annihilation periods of our Company, determined in compliance with the Personal Data Processing Inventory, is determined hereinbelow:

PROCESS	STORAGE TERM	ANNIHILATION PERIOD
Planning and execution of corporate communication activities	10 years following the termination/expiry of the business relationship	Within 30 days of the data subject's application regarding the request for annihilation
General assembly	10 years	180 days following the expiry of the
Responding to courts and enforcement offices requests regarding information of personnel	10 years following the termination/expiry of the business relationship	180 days following the expiry of the storage term
Execution of contracts	10 years	180 days following the expiry of the
Payroll and personnel file processes relating to employment	10 years following the termination/expiry of the business relationship	180 days following the expiry of the storage term
Human resources processes relating to job applications of potential	1 years following the termination/expiry of the business relationship	180 days following the expiry of the storage term
Personnel attendance control system	1 years following the termination/expiry of the business relationship	180 days following the expiry of the storage term

Occupational health and safety practices	10 years following the termination/expiry of the business relationship	180 days following the expiry of the storage term
Log / Recording / Tracking Systems	2 years	180 days following the expiry of the storage term
Master data generation processes	10 years following the termination/expiry of the business relationship	180 days following the expiry of the storage term
Information on the Company's shareholders and board members	10 years	180 days following the expiry of the storage term
Payment procedures	10 years following the expiry/termination of the business/commercial relationship	180 days following the expiry of the storage term
Visitor records	5 years following the date visited	180 days following the expiry of the storage term
Guests information given at registration	5 years following the last date they stayed	180 days following the expiry of the storage term
Sharing meeting minutes with participants	10 years	180 days following the expiry of the storage term
Emergency preparations	1 year	180 days following the expiry of the storage term
Video / audio records	30 days following the date recorded	180 days following the expiry of the storage term

PERSONAL DATA RECORDING MEDIUMS

ELECTRONIC MEDIUMS	NON-ELECTRONIC MEDIUMS
Personal computers (Laptop and desktop)	Manual data records (Surveys, guestbooks)
Mobile devices	Written / printed / visual presentation documents
Servers: Web, E-mail (Office 365), Back-up, Data Base, File Sharing	Documents stored in archives physically
Software: Office Software, Portal Plus, Opera, Netsis, My Fidelio, POS System (Micros), Possible (Stock Control), Portal	
Applications: TIS, KBS	
Equipment such as printers, scanners, photocopy machines	

7. ENFORCEMENT DATE AND UPDATING THE POLICY

This policy contains information in accordance with the PDPL and other legislation on personal data and will enter into force on 18.02.2020 on the www.bhistanbulhotel.com website ("Website"). The policy may be updated from time to time due to legal amendments, changes to the Bilgili Holding Group's personal data processing purposes or for other reasons. Updates will be effective as of the date of publication of the new updated Policy on the Website.