

	<b>PROTECTION OF PERSONAL DATA</b>	Version	1.1
		First Issue Date	
	Customer Information Notice	Last Update	[*publishing date will be printed]
		Page No	1 / 6

## BURSA ÇELİK TURİZM A.Ş.

### CUSTOMER INFORMATION NOTICE

#### I. Identity of the Data Controller

This Information Notice is issued by **Bursa Çelik Turizm A.Ş.** (Çelik Turizm or the “Company”), as the Data Controller pursuant to Article 10 of the Protection of Personal Data Law Nr. 6698 (“KVKK”) and the Communiqué on the Procedures and Principles to be followed in the Fulfillment of the Information Obligation. Your Personal Data may be processed by **Sheraton** as the Data Controller according to the scope explained below.

#### II. Processed Data Categories and Sample Data Types

Related Person Upper Category	Related Person	Personal Data Upper Category	Personal Data Sub-Category
CUSTOMER	Real Person Customer	Identity Information	Name-Surname; Date of Birth; T.R. ID No; Father’s Name; Photocopy of the Identity Card; Nationality; Signature; Sex; Vehicle Plate No; Driving License No
		Contact Information	E-mail; Address; Last Residing Country/City; address at next destination of the customer
		Physical Place Information	CCTV (Camera) Records; Identity Verification Information (Password, Token etc.); Log in/out information to Websites; IP Address Information; Cookie Records
		Legal Procedure	Internet Access Logs (for everyone connecting to internet through

		<b>Information</b>	company web)
		<b>Procedure Safety Information</b>	Identity Verification Information (Password, Token etc.); Log in/out information to Websites; IP Address Information; Cookie Records*
		<b>Education and Job Information</b>	Profession Information
		<b>Customer Transaction Information</b>	Check in date; Check out date; lodged Room No and Number of Lodging Days; Information of persons with guests (Name-Surname, Level of Relationship etc.); Type of Room; Invoice/Check/Bill Information; Records of the Misbehaving Guests
		<b>Economic and Financial Information</b>	Credit Card Number; Tax No
		<b>Sensitive Personal Data *</b>	Allergy; Health Status/Report
		<b>Marketing Information*</b>	Survey Information; Cookies Records; Information and Assessment obtained through Direct Marketing Studies; Personal Interpretation-Preferences-Taste-Habits;
		<b>Claim/Complaint Management Information</b>	Information and Record collected regarding complaints made by the person for products and services; Information and Record collected regarding claims made by the person for products and services ;

		<b>Reputation Management Information</b>	Complaints Received/Collected through Internet and Social Media; Information on actions taken for complaints received/collected from online channels;
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Information contained in upper data category with “\*” sign are processed and transferred with explicit consent of our customers in order to provide better service to them.

### **III. Purpose of Processing the Personal Data**

Your personal data as mentioned above may be processed for following purposes, including but not limited to provide the services, which caused your disclosure of such data to **Bursa Çelik Turizm** and which are necessary for provision of the same to our customers, to improve our products and services, to provide rights and interests to you according to the activities developed for utilization of the products, to sustain and develop inter-corporate activities, and to manage business relations with you in particular, pursuant to provisions related to personal data processing of Articles 4, 5 and 6 of Law:

- Planning and Performance of Emergency Management Processes
- Planning, Audit and Performance of Information Safety Processes
- Carrying out the Activities in Conformity with the Legislation
- Company/Product/Service Loyalty Activities
- Audit of Physical Place and Provision of Safety
- Performance of Communication Activities
- Taking the Measures for Provision and Improvement of Work Processes
- Planning and/or Carrying out of Activities for Provision of Work Sustainability
- Planning and Carrying out of Corporate Communication Activities
- Performance of Product/Service Sales Processes
- Provision of Discounts to the Guests
- Pursuance of Guests Lodging Processes
- Planning and Performance of Customer Relations Management Processes

- Planning and/or Performance of Customer Satisfaction Activities\*
- Marketing Analysis Studies\*\*
- Agreement Processes/ Execution and/or Enforcement of Agreements
- Provision of Safety for Company Operations
- Planning and Performance of relevant Processes in order to obtain the Best Interest from Products or Services Provided by the Company
- Pursuance of Claims/Complaints/Suggestions
- Keeping the Record of Misbehaving Customers
- Planning and Performance of Market Research Activities for Sales and Marketing of the Products and Services
- Planning and Performance of Sales Processes of Products and/or Services
- Creation and/or Pursuance of Allocation and/or Assessment Processes of the Products and/or Services
- Performance of Marketing, Promotion, Change and Maintenance Activities related to Products and/or Services\*\*
- Ensuring that Data are updated and Correct

The purposes marked with “\*\*\*” refers to the processing purposes to be performed within the scope of explicit consents of the customers.

#### **IV. Information on to whom the processed personal data may be transferred for what purpose**

Your personal data collected by **Bursa Çelik Turizm** is transferred to Marriott International Inc., our local and/or foreign Business/ Solution Partners for storage purposes at domestic and/or international servers, our Company Executives, legally competent state/private entities, private persons or legal entities and third parties for the purpose of and limited to performing the above-mentioned purposes and they may be processed domestically or internationally limited to above-mentioned purposes pursuant to provisions related to personal data protection of Articles 8 and 9 of KVKK.

## **V. Methods and Legal Reasons for Collection of Personal Data**

**Bursa Çelik Turizm** collects the personal data, which are obtained verbally, electronically or in writing directly from customers through electronic/digital medias such as web site of the company, mobile applications, social media accounts and e-mails, from customers and services utilized by the customers for correct utilization of the services and performing necessary improvements in services according to needs of the customers, from potential customer candidates, from our solution partners and other business partners in order to provide our services to utilization of our customers, and from administrative and legal authorities through notices, fax messages and other communication means for following legal reasons pursuant to Articles 5 and 6 of the Law:

- Where your explicit consent exists when necessary (e.g. communication for purpose of marketing, promotion, changes and maintenance services related to products and/or services, processing of personal data to Marriott Group system within the scope of Marriott Group Loyalty program)
- Where processing of your personal data is expressly permitted by any law (e.g. processing of information contained in the service invoices etc.)
- Where processing of your personal data is necessary, provided that we have established a contractual relationship with you or processing is directly related to fulfillment of such liabilities under the contract (e.g. sharing of personal data by you during booking stage etc.)
- Where it is necessary for compliance with a legal obligation which we are subject to (e.g. requesting updated contact information from you within the scope of our legal obligation to keep your data updated etc.)
- Where you share your personal data (e.g. when you get in touch with our company regarding your suggestions and complaints etc.)
- Where a right is granted to you by us, and where we are obliged to process your data in order for us to grant or to ensure utilization of the same (e.g. processing of personal data according to Starwood Preferred Guest (SPG) application)
- Where we are obliged to process your data, provided that your fundamental rights and freedoms are not harmed (e.g. storing of your data by us until period of limitation ends against a possible legal dispute)

**VI. As the Data Subject, your rights are as follows pursuant to Article 11 of the Law**

Each person has the right to apply to the controller and; **(i)** To learn whether your personal data have been processed or not, **(ii)** To request information as to processing if your data have been processed or not, **(iii)** To learn the purpose of processing of the personal data and whether data are used in accordance with their purpose or not, **(iv)** To know the third parties in the country or abroad to whom personal data have been transferred, **(v)** To request rectification in case personal data are processed incompletely or inaccurately, **(vi)** to request deletion or destruction of personal data within the framework of the conditions set forth under Article 7 of KVKK, **(vii)** To request notification of the operations made as per sub-clauses (e) and (f) to third parties to whom personal data have been transferred, **(viii)** To object to occurrence of any result that is to your detriment by means of analysis of personal data exclusively through automated systems, **(ix)** To request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

As the owner of personal data, you may perform any change, update and/or deletion procedures or submit related requests by filling the “*Application Form for Personal Data Owners*” through website of **Bursa Çelik Turizm** and by sending e-mail to our official e-mail address: **kisiselveri@sheratonbursahotel.com** in order to inform your requests and utilize your rights on your personal data.

In case you contact us via specified methods, the Company shall conclude your request free of charge as soon as possible according to the nature of the request, but within maximum thirty days in any case. However, in case the process requires an extra cost, the fees determined by Personal Data Protection Board shall be collected by the Company.

*I hereby accept, represent and warrant that I have read and acknowledged above-mentioned information notice related to Processing of Personal Data, I have been enlightened by **Bursa Çelik Turizm A.Ş.** acting in capacity of Data Controller, and further that I will inform any changes in my Personal Data processed by the Company to the Company as soon as possible.*

Personal Data Owner’s Name-Surname:

Date:

Signature: