

POLICY ON PROTECTING PERSONAL DATA

This policy explains the principles for the processing of personal data that should be known by the website users of **DOĞUŞ OTEL YATIRIMLARI VE TURİZM A.Ş.** 's ("D Hotelier") reservation management system www.dhotelier.com.tr

I. Definitions

Under this policy;

D Hotelier: Means **DOĞUŞ OTEL YATIRIMLARI VE TURİZM A.Ş.**, the owner of the site.

Data subject/natural person: Means the personal data owner.

Recording medium: Means any medium containing personal data that is fully or partially automated or processed non-automatically provided that it is a part of any data recording system.

Site: The website <http://www.dhotelier.com.tr>

Data Processor: Means natural or legal person who processes personal data on behalf of the data controller.

Data Controller: Means 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.

Law No. 5651: Means the Law on Regulating Broadcasts Made on the Internet and Combating Crimes Committed Through These Publications

Law No. 6698/LPPD: Means the Law on Protection of Personal Data.

II. Privacy and Scope and Purpose of the Personal Data Protection Policy

This Policy on Protecting Personal Data and Privacy explains;

- a. Methods and legal reasons for collecting personal data,
- b. The personal data of which groups of people are processed (Data Subject Person Group Categorization),
- c. In which category personal data are processed in relation to these groups of persons (Data Categories) and sample data types,
- d. In which business processes and for what purposes this personal data is used to.
- e. Technical and administrative measures taken to ensure the security of personal data,
- f. To whom and for what purpose personal data can be transferred,
- g. Retention periods of personal data,
- h. What are the rights of the Data Subjects on their personal data and how they can exercise these rights,
- i. How the Data Subjects can change their positive or negative preferences in receiving electronic commercial messages,

III. Collection and Processing of Your Personal Data

1. Processing of Personal Data of Website Users (Online Visitors) and Call Center Users

1.1. *Processing of Personal Data of Website Users (Online Visitors)*

Users who use the site to make requests and suggestions; can submit the information such as name, surname, e-mail, telephone, gender, date of birth, address, message, sector and subject of the form by filling out the form on the "Contact" page at <http://www.dhotelier.com>.

Users accept that they share this personal data with the Site with their own free will, and that this data is only requested for the purpose of evaluating the requests and suggestions they have submitted.

In addition, traffic information of users visiting the Website is processed in accordance with Law No. 5651.

1.2. Processing of Personal Data of Call Center Users

Personal data of users calling the call center with +90 0212 354 22 95 phone number are collected and stored by the Call Center company which is in a contractual relationship with D Hotelier and has the same legal and technical responsibilities as D Hotelier on data protection and security and complies with the provisions of the relevant legislation.

Personal data such as name, surname, telephone number and e-mail address are collected during the call from the users who call the Call Center. These data are processed for carrying out the necessary work and carrying out the relevant business processes to benefit you from the products and services offered by our company, planning and execution of the activities required for the recommendation and promotion of the products and services offered by the company by customizing them according to your tastes, usage habits and needs, carrying out the necessary work by our relevant business units for the realization of the commercial activities carried out by our company and carrying out the related business processes, planning and execution of our company's commercial and / or business strategies, ensuring the legal, strategic and commercial job security of our company and those who are in business relations with our company

Your personal data, which you have shared by calling our call center, is collected and stored by the call center company in order to process your requests, suggestions and complaints, to inform you about the result of the transaction and to improve the services and products offered within this scope.

IV. Data Categories and Sample Data Types

1.	<p>Online Visitor</p> <ul style="list-style-type: none"> • Transaction Security Information: Password, mobile phone, password information • Legal Transaction Information/Risk Management Information: IP address • Legal Procedure and Compliance Information: Start and end time of the service provided, the type of service used, the amount of data transferred. • Reservation Information: Reserved hotel, number of guests, reservation time, special requests • Post-Booking Assessment: Satisfaction assessment, comments, loyalty scores
2.	<p>Web site users</p> <ul style="list-style-type: none"> • Identity Information: Name, surname, date of birth, • Contact Information: mobile phone, e-mail address, address

V. Security and Transfer of Your Personal Data and Exercise of Your Rights on Your Personal Data

All your personal data you have shared with us will be kept confidential in the database of D Hotelier in accordance with Article 12 of the Law numbered 6698 on Personal Data Protection and will not be shared with third parties for commercial purposes.

D Hotelier undertakes to take all necessary technical and administrative measures and show due diligence to ensure the confidentiality, integrity and security of your personal data.

D Hotelier takes the necessary measures to prevent unauthorized access, misuse, illegal processing, disclosure, alteration or destruction of personal data. D Hotelier uses generally accepted security technology standards such as firewalls and Secure Socket Layer (SSL) encryption when processing personal data. In addition, when sending your personal data to D Hotelier through the website, mobile application and mobile site, these data are transferred using SSL.

Regarding the prevention of unlawful access to the personal data that D Hotelier processes, the prevention of unlawful processing of these data and the protection of personal data:

- The website where personal data is taken protects all domains with SSL,
- Creates and implements access authorization and control matrices for its employees in order to prevent unlawful processing of personal data collected from the website,
- It ensures that personal data in paper is kept in lockers and can only be accessed by authorized persons.
- Personal data processed through cookies belonging to third parties from which the service is received is managed and protected within the rules determined by cookie policies.
- Although D Hotelier takes the necessary information security measures, in the event that personal data is damaged or obtained by unauthorized third parties as a result of attacks on platforms operated by D Hotelier or the D Hotelier system, D Hotelier immediately notifies you and the Personal Data Protection Board and takes necessary precautions.

The rights of the Data Subject on personal data processed by D Hotelier in accordance with the Article 11 of the LPPD are listed below:

- to learn whether personal data is processed or not,
- to request information if personal data has been processed,
- to learn the purpose of processing personal data and whether they are used appropriately for their purpose,
- to know the third parties to whom personal data is transferred within or outside the country,
- to request correction of personal data in case of incomplete or incorrect processing,
- to request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of LPPD,
- to request notification of the transactions carried out in accordance with sub-paragraphs (d) and (e) to third parties to whom personal data have been transferred,
- to object to the occurrence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
- to demand the compensation of the damage in the event of damage due to the processing of personal data illegally.

In order to exercise your rights over your personal data; you can make your application and use your rights with the methods specified in the "Application Form" on the website or mobile application of electronic commerce platforms operated by D Hotelier and arranged in accordance with the Article 13 of the LPPD.

VI. To Whom Personal Data Can Be Transferred for What Purpose

D Hotelier transfers personal data only to the third parties specified in accordance with the 8th and 9th articles of the LPPD and in line with the purposes specified in this Policy on Protecting Personal Data and Privacy.

Your collected personal data will be shared with;

- The relevant departments of D Hotelier in order to carry out reporting activities,
- The relevant departments of Doğuş Technology in order to collect data and perform analysis activities,
- Doğuş Holding A.Ş., all of its subsidiaries and affiliates, to third parties in Turkey and/or abroad with whom we have contractual relationship,
- The member businesses that are our program partners to which you will make reservations, to the extent required
- In order to increase customer satisfaction and loyalty, Customer data is shared with companies that will conduct market research.
- If you allow the processing purposes specified in the “Consent Text on the Processing of Personal Data”, it will be transferred to Dogus Tourism Group brands,
- In addition, your reservation information will be shared with Doğuş Bilgi İşlem ve Teknoloji Hizmetleri A.Ş. by our program partner member businesses, with whom you will make a reservation after you become a member.

Please click on <https://www.d-teknoloji.com.tr/> for information about Doğuş Bilgi İşlem ve Teknoloji Hizmetleri A.Ş., www.dogusgrubu.com.tr for Doğuş Holding A.Ş., all of its subsidiaries and affiliates, www.dhotelier.com.tr for the up-to-date member business list.

Personal data subject to transfer within and outside the country mentioned above; in addition to the technical measures to ensure their security, are also legally protected by the LPPD compliant provisions included in our agreements, considering that the counterparty of the legal relationship is a data controller or a data processor.

As said above, during sharing information when transferring personal data to countries other than Turkey, the transfer of data is ensured in accordance with this policy and as permitted by the applicable law on data protection.

VII. Retaining Your Personal Data Correct and Updated

The Data Subject groups whose personal data we process accepted and declared that they know that the correct and up-to-date personal data shared on the Website and/or provided by themselves due to the contractual relationship are important for them to be able to exercise their rights on their personal data in the sense of LPPD and other relevant legislation and that the responsibility arising from providing false information will be entirely theirs.

VIII. How Data Subjects Can Change Their Positive or Negative Preferences About Receiving Electronic Commercial Messages

The consent of the customer regarding the Commercial Electronic Message is obtained through the information form on the website www.dhotelier.com. Commercial message delivery is carried out by D Hotelier under the name of “D Hotelier”.

You can change or update your positive or negative preferences for receiving commercial electronic messages at any time, which you have given while signing up or at a later time, through the website www.dhotelier.com operated by D Hotelier.

IX. Personal Data Retention Period

D Hotelier keeps the personal data it processes in accordance with LPPD for the periods stipulated in the relevant legislation or required by the processing purpose. These periods are approximately as follows in our Policy on Personal Data Storage and Destruction:

All records regarding accounting and financial transactions	10 years	Law No. 6102, Law No. 213
Commercial electronic message confirmation records	1 year from the date of withdrawal of approval	Law No. 6563 and related secondary legislation
Traffic information for online visitors	2 years	Law No. 5651
Personal data about customers	0 years after the legal relationship ends; 3 years in accordance with Law 6563 and related secondary legislation; 90 days for CCTV recordings	Law No. 6563, Law No. 6102, Law No. 6098, Law No. 213, Law No. 6502

X. Deletion, Destruction or Anonymization of Your Personal Data

The www.dhotelier.com website stores the personal data processed through its mobile application for the periods stipulated by the relevant laws and/or the periods required by the processing purpose pursuant to Article 7, 17 of the LLPD and Article 138 of the Turkish Penal Code. In the event that these periods expire, they will delete, destroy or anonymize in accordance with the provisions of the Regulation on Deletion, Destruction or Anonymization of Personal Data.

Deletion of personal data by D Hotelier refers to the process of making personal data inaccessible and unavailable in any way for the relevant users. D Hotelier creates and implements user-level access authorization and control matrix for this. It takes the necessary measures to perform the deletion in the database.

The destruction of personal data by D Hotelier means the process of making personal data inaccessible, irrevocable and unusable in any way by anyone.

The anonymization of personal data by D Hotelier means making personal data unrelated to an identified or identifiable natural person under any circumstances, even if they are matched with other data.

D Hotelier explains in detail the methods for deletion, destruction and anonymization and the technical and administrative measures taken within the scope of the Personal Data Storage and Destruction Policy prepared in accordance with the Regulation on the Deletion, Destruction or Anonymization of Personal Data. In this Policy, the period of periodic destruction stipulated by the Regulation is also determined as 6.

XI. Possible Changes and Updates to the Policy

D Hotelier may always make changes or updates in this Policy in line with the legal regulations and Company Policy. These changes become effective immediately upon publication of the new policy. Relevant people are informed about the new Policy text, which reflects all these changes and updates, via the website.

D HOTELIER

LPPD APPLICATION FORM

Scope of the Right to Apply

In the Law Numbered 6698 on Personal Data Protection ("LPPD"), personal data owners ("Hereinafter referred to as" Applicant ") have been granted the right to make certain requests regarding the processing of their personal data in Article 11 of the LPPD:

- a. To learn whether personal data is processed or not,
- b. To request information if personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used appropriately for their purpose,
- d. To know the third parties to whom personal data is transferred within or outside the country,
- e. To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data are transferred,
- f. Although it has been processed in accordance with the provisions of LPPD and other relevant laws, in the event that the reasons requiring its processing disappear, to request the deletion, destruction or anonymization of your personal data and to notify the third parties to whom the personal data is transferred,
- g. To object to any unfavorable result arising from the analysis of the processed data exclusively through automated systems,
- h. To request the compensation of the damage in case of damage due to unlawful processing of your personal data.

Application Method

The Law Numbered 6698 on Personal Data Protection ("**LPPD**") states that the application to be made by the natural persons ("**Data Subject**") whose personal data is processed to the data controller in order to exercise their rights on their personal data will be transmitted *"in writing or by other methods determined by the Personal Data Protection Board"*.

Pursuant to the first paragraph of Article 13 of the LPPD; the applications to be made to D Hotelier, who is the Data Controller, regarding these rights must be submitted to us by the following application methods or other methods determined by the Personal Data Protection Board ("Board"). The applications to be made to D Hotelier in "writing" will be made by printing out this form and using one of the methods in the table. There is no need to print this form for applications made via e-mail. The applicant should pay attention to the following explanations in written applications.

APPLICATION METHOD	APPLICATION ADDRESS	MANDATORY INFORMATION TO BE SUMITTED IN THE APPLICATION
Registered Receivable Letter / Notary Channel	D Hotelier Merkez Ofisi: Maslak Mah. Büyükdere Cad. No:249/9 Sarıyer/İstanbul	"Request for Information within the Scope of the Law on Protection of Personal Data" will be written on the envelope / notification.

Personal Application		"Request for Information within the Scope of the Law on Protection of Personal Data" will be written on the envelope.
Via Registered Electronic Mail (REM)	[...] @hs03.kep.tr	"Request for Information within the Scope of the Law on Protection of Personal Data" will be written in the subject section of the registered e-mail.
Via Electronic Mail	kisiselverilerim@dhotelier.com.tr	"Protection of Personal Data" in the subject section of the e-mail Information Request within the Scope of the Law "will be written. Applicant; while signing up to www.dhotelier.com.tr , the requests made using this e-mail address will be accepted by confirming whether it was done using the e-mail address registered in the system.
Via Electronic Mail Signed with Secure Electronic Signature	kisiselverilerim@dhotelier.com.tr	"Protection of Personal Data" in the subject section of the e-mail Information Request within the Scope of the Law "will be written.

I. Contact Information of the Data Subject:

Name surname:

CKN:

Phone or Mobile Phone Number:

E-mail address (If the reply is requested to be sent electronically):

Personal REM Address (If the answer is requested to be sent electronically):

Address (if the reply is requested to be sent by mail):

II. Explanations regarding the relationship of the data subject with our company (such as candidate employee, supplier, customer, visitor):

III. Please specify your request within the scope of LPPD in detail:

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IV. Signature of the Data Subject:

V. Finalization of Applications

In the event that the Applicant submits his/her request regarding his/her personal data to D Hotelier in writing and by the methods described in this application form; depending on the nature of the request, D Hotelier will finalize the request within (30) days from the date of receipt of the request to D Hotelier and send it to the Applicant electronically.

In order to ensure the security of personal data and to prevent illegal data sharing, D Hotelier may request information from the Applicant for identity verification. D Hotelier may also ask a question to the Applicant about the application in order to ensure that the application is concluded in accordance with the request. In case the request requires an additional cost, the fee in the tariff to be determined by the Board may be reflected to the Applicant (Communiqué on Application Procedures and Principles for Data Supervisor - Article 7).

The Applicant agrees that D Hotelier will not be liable for the requests arising from the application in question if the information regarding the requests submitted under this form is not accurate and up-to-date or if an unauthorized application is made.

Applicant (Data Subject) Name - Surname:

Application Date:

Signature:

D HOTELIER
ENLIGHTENMENT TEXT ON THE PROCESSING OF PERSONAL DATA

a) Data Controller

In accordance with the Law Numbered 6698 on Protection of Personal Data (“**Law No. 6698**”), your personal data can be processed by **DOĞUŞ OTEL YATIRIMLARI VE TURİZM A.Ş.** (“**D Hotelier**”) as the Data Controller within the scope of the briefly explained below, the details of which are available in the “Policy on Processing and Protection of Personal Data” at www.dhotelier.com.tr

b) Purposes for Processing Personal Data

Your collected personal data can be processed within the personal data processing conditions specified in Articles 5 and 6 of Law No. 6698 in order to provide better service to the members of “D Hotelier”, the hotel reservation management system of **DOĞUŞ OTEL YATIRIMLARI VE TURİZM A.Ş.**, one of Doğuş Holding A.Ş.’s affiliates, and for the purposes listed below:

- Planning and/or execution of corporate communication activities, customer/potential customer relations management processes,
- Surveys and customer satisfaction surveys,
- By contacting according to your request, making all kinds of communication/making all kinds of electronic communication and sending other communication messages; regarding the requested product and/or service,
- Saving accommodation preferences in the system and analyzing the recorded data in order to ensure customer satisfaction,
- Fulfillment of a legal obligation specified in the law,

c) Legal Reasons for Processing Personal Data

Your personal data is electronically collected and processed based on the following legal causes ; ; “Clearly stipulated in the laws” specified in the clause (a) of paragraph 2 of Article 5 of the Law on Protection of Personal Data; “It is necessary to process personal data as it is directly related to the establishment and execution of the agreement”, specified in paragraph (c) and “Provided that it does not harm the fundamental rights and freedoms of the data subject, it is compulsory to process data for the legitimate interests of the data controller” specified in paragraph (f) and your explicit consent, in case you give such explicit consent.

d) Your Personal Data Categories We Process

Your personal data in the following categories are processed by “D Hotelier” and “Doğuş Teknoloji”:

- Identity data (Name, surname, TR identity number, date of birth, gender)
- Contact information (Mobile phone number, e-mail address, information that the member approves to be shared via those channels in case of connection with social media accounts)
- Reservation information (Which member businesses, reservation point and time, how much payment was made, which campaign was benefited from, the discount amount received, the navigation and click information on the application, the location information where the application was opened)

In order to benefit from the benefits of "D Hotelier" membership, these personal data are processed in accordance with your explicit consent, will be processed and stored, and also by taking information security measures, provided that they are not used outside the purposes and scope specified by the Policy on Personal Data Protection on www.dhotelier.com.tr

e) Recipient Groups to Which Your Processed Personal Data Can Be Transferred and for Which Purposes

Your personal data will be shared with;

- The relevant departments of D Hotelier in order to carry out reporting activities,
- The relevant departments of Doğuş Technology in order to collect data and perform analysis activities,
- Doğuş Holding A.Ş., all of its subsidiaries and affiliates, to third parties in Turkey and/or abroad with whom we have contractual relationship,
- The member businesses that are our program partners to which you will make reservations, to the extent required,
- If you allow the processing purposes specified in the “Consent Text on the Processing of Personal Data”, it will be transferred to d.ream group brands,
- In addition, your reservation information will be shared with Doğuş Bilgi İşlem ve Teknoloji Hizmetleri A.Ş. by our program partner member businesses, with whom you will make a reservation after you become a member.

Please click on <https://www.d-teknoloji.com.tr/> for information about Doğuş Bilgi İşlem ve Teknoloji Hizmetleri A.Ş., www.dogusgrubu.com.tr for Doğuş Holding A.Ş., all of its subsidiaries and affiliates, www.dhotelier.com.tr for the up-to-date member business list.

f) Measures We Take to Ensure the Security of Your Personal Data

Detailed information regarding the security of your personal data we process can be found in the Policy on Processing and Protection of Personal Data” at www.dhotelier.com.tr

g) Retention Periods of Your Personal Data

Your personal data are stored for the periods specified in D Hotelier’s Policy on Protection of Personal Data. It is possible to summarize our personal data retention periods as follows:

- As long as the purpose of processing personal data requires,
- According to Article 8 of the Law Numbered 5549 on the Prevention of Laundering Proceeds of Crime, documents related to identification are kept for a period of 10 years from the date of the last transaction.

h) Your Rights as a Data Subject stipulated in Article 11 of the Law No. 6698

The rights you have over the personal data you have shared with us, pursuant to Article 11 of Law No. 6698, are as follows:

- a) to learn whether personal data is processed or not,
- b) to request information if personal data has been processed,
- c) to learn the purpose of processing personal data and whether they are used appropriately for their purpose,
- ç) to know the third parties to whom personal data is transferred within or outside the country,
- d) to request correction of personal data in case of incomplete or incorrect processing,
- e) to request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7,
- f) to request notification of the transactions carried out in accordance with sub-paragraphs (d) and (e) to third parties to whom personal data have been transferred,

g) to object to the occurrence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,

gh) to demand the compensation of the damage, in the event of a damage due to the processing of personal data illegally.

To exercise these rights, you can always contact us using the “Application Form” under the Protection of Personal Data section on our website (www.dhotelier.com.tr) and the methods specified in this form.

In addition, if you have incomplete or incorrectly processed personal data, or if there is any change in your processed personal data, you can access your profile from the “settings” section in D Hotelier application and perform necessary changes and/or update in order to change and update your personal data. You can apply to D Hotelier at kisilverilerim@dhotelier.com.tr in order to request notification of this situation to third parties whom your personal data is transferred and to use all your other rights you have in accordance with Article 11 of the Law Numbered 6698 on Protection of Personal Data.

i) To withdraw your consents;

You can withdraw your consents given to D Hotelier and Doğuş Grubu companies within the scope of Personal Data Protection at any time.

- Follow the processes in the sms or e-mails sent to you to withdraw the commercial electronic message approval.
- You can access the “Website Terms of Use and Cookie Policy” at www.dhotelier.com to edit or withdraw your personalized advertising applications consent.
- You can also send an e-mail to kisilverilerim@dhotelier.com.tr at any time to withdraw your explicit consent to the processing of your personal data.

j) Leaving the message list;

If you wish to withdraw your consent and do not wish the messages sent to you for campaign promotions or information purposes, you can send an e-mail to info@dhotelier.com.tr or click the exit link in the messages sent to you.

DHOTELIER.COM

CONSENT TEXT ON THE PROCESSING OF CUSTOMER PERSONAL DATA

In accordance with the Law Numbered 6698 on Protection of Personal Data (“Law No. 6698”), my personal data will be transferred to **DOĞUŞ OTEL YATIRIMLARI VE TURİZM A.Ş.** A.Ş. (“D Hotelier”) in accordance with the “Policy on Processing and Protection of Personal Data”, details of which are available at www.dhotelier.com, and within the scope of “D Hotelier Enlightenment Text on Processing of Personal Data”:

Yes No

I consent to sharing of my personal data in order to be able to send electronic commercial messages to me so in terms of marketing the goods and services offered by D Hotelier, being informed about campaigns, promotions and events:

Yes No

I allow processing my likes and preferences in order to provide services such as personalized advantage, advertisement, promotion, marketing, information, promotion, campaign notification within the scope of customer satisfaction, to provide services in accordance with my personal preferences and to share them with the persons specified in the D Hotelier Enlightenment Text on Processing of Personal Data for these purposes:

Yes No

Name Surname:

Date:

Signature: