

PRIVACY POLICY

Bodrum Hotel Management JSC –Duja Didim (hereinafter the “**Duja**”) as a data controller will explain how our company uses the personal data we collect from you when you use our web-site via this Privacy Policy (hereinafter the “**Policy**”) within the scope of the Turkish Personal Data Protection Law No. 6698 and General Data Protection Law.

Hereby with this policy, as a data controller **Duja** will be fulfilled its obligation to data subjects regarding to their right to be informed under the Article 10 of the Turkish Personal Data Protection Law No. 6698 regarding to personal data that you have shared with us via our services that we provide you during your stay at **Duja**. This Policy contains references to other key **Duja** policies and processes relevant to data protection, including information security policies.

HOW DO WE COLLECT YOUR DATA?

For each of the categories of personal information and purposes which will be described beloved, we collect your personal information with our set of operations which is performed whether or not by automated methods, tools and services, including comment cards and email communications sent to and from **Duja**.

Otherwise, we gather information when you provide it to us, or interact with us directly, for example:

- when you visit our website
- from documentations that we use when you buy services and products from **Duja**.
- E-bulletins that we have sent within your legal consent for marketing purposes.
- Business cards that we have received from you during expos and events
- Guest surveys
- Online forms (online reservation forms, surveys, **Duja’s** social media accounts)
- Loyalty Programs
- Your contact info that we have received from our local and global business partners
- Requests and complaints that we received from you such as via **Duja’s** social media etc
- Contacting with you via phone, e-mail etc
- Tour operators, travel agent and reservation systems etc
- Forms that needs to be filled by you due to our legal obligations

WHAT DATA DO WE COLLECT AND USE YOUR DATA AND ON WHAT LEGAL BASIS DO WE USE THEM?

Personal Data means any information relating to an identified or identifiable natural person such as a name, surname, address or e-mail address.

The personal information that we process includes:

Identity information such as Name, Signature, Identification Number, Passport Information, Birth Year

Contact information – such as your Phone Number Email Address and Home Address

Guest/Consumer information – such as Special Requests, Service Issues and Other Preferences for Your Stay, Legal Consents, Room Number, Call Centre Records

Financial information – such as your credit card details, CVV number, Expire date

Physical Place Security- CCTV Recordings, Entrance and Exit Information of Guests

Location- Places that you have been in last 14 days

Marketing- Shopping History, Surveys, Cookies, Information that we collect during your marketing exercises, Information that we collect before and during your stay at **Duja**.

Health information – where Disclosed and Relevant to The Provision of Services Such as Your Disability Status, Chronic Disease Info, Temperature Info, COVID-19 Symptoms Info

Other – License Plate

*As **Duja** due to, the current pandemic, our Hygiene and Quality Operations and Certifications which supported by Turkish Ministry of Tourism and Culture regarding to a Special Certification of COVID-19 Application for Hotels and Restaurants, your health data will be processed within your consent in order to provide you a healthier and secure service and protect our staff. Processing will be performed under the article 6 of Turkish Personal Data Protection Law No. 6698 which comprehends, where we only perform processing within the public interest to do so, including for health purposes such as public health and social protection and the management of health care services, by private law, such as a professional association.*

*It is important to mention that during your bookings and reservation processes to **Duja**, the data that you have shared with us which concerns health will be processed to provide the best service for your health and safety within your consent*

under the article 6 of the Turkish Personal Data Protection Law No. 6698 which comprehends, where we only perform processing within the public interest to do so, including for health purposes such as public health and social protection and the management of health care services, by private law, such as a professional association.

*If you contact with **Duja** via our Call Centre, you can find our Privacy Policy for our call centre within the auto-answer service.*

The personal information that processed by **Duja** which have mentioned above are under the article 4 of Turkish Personal Data Protection Law No. 6698 which concerns General Principles Relating to Processing of Personal Data. Therefore, the processing by **Duja** will be performed lawfully, fairly and in a transparent manner in relation to the data subject ; adequate, accurate, relevant and limited to what is necessary in relation to the purposes for which they are processed, collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes where necessary, kept up to date. Furthermore, every reasonable step is taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay by the Erasure, Destruction, Anonymisation and Privacy Policy of **Duja**.

Within this context, **Duja** collects your data so that we can;

- to provide superior customer service to you with your wishes and recommendations,
- to manage customer relationships,
- to help us identify you and any accounts you hold with us,
- to contact you in relation to matters that arise from your stay with us,
- in order to address you formally by your name in order to avoid misunderstandings during contacting with you,
- to index your requests by titles, order to provide better customer service to you with based on your recommendations,
- to return you about your requests and recommendations, regarding to the information that you have provided to us with our internal analyses,
- to complete your booking process,
- to assist us in making your reservation and providing the services you request during your bookings,
- to process transactions through our website and to assist in any inquiries about your transaction;
- for billing purposes in relation to your stay with us for the purchases above 5.000 Turkish Liras,
- to confirm prior transactions and reconcile statements, invoices or e-invoices,
- to send you newsletters regarding our properties and to advise you of promotions or to inform you of offers or other information that may be of interest to you
- to conduct our services abided by the Law on Regulation of Publications on The Internet and Suppression of Crimes Committed by Means of Such Publications No. 5651 and monitoring and networking Internet usage under the provisions of the aforementioned Regulation,
- maintain our services regarding to legal consents that we received from you and storing your consents in a lawful and adequate manners,
- to conduct marketing exercises or focus groups to receive your views of **Duja** and service delivery,
- to enable a better use of our website
- to link Social Media accounts to our website in order to enable a superior use of it,
- to operate our business, including for internal purposes such as auditing, data analysis, statistical and research purposes and troubleshooting to help us improve our services,
- to take necessary precautions means in both technical and administrative regarding to Personal Data Protection
- to provide a certain level of hygiene for our facility to maintain a healthy holiday experience for you and secure work environment for our staff and to inform local and governmental bodies in case of COVID-19 case

Duja processes your data lawfully, fairly and in a transparent manner in relation to the data subject; adequate, accurate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Furthermore, when the processing is necessary; for compliance with a legal obligation to which the controller is subject, for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, order to protect the vital interests of the data subject, for the purposes of the legitimate interests pursued by the controller or by the third party or parties to whom the data are disclosed, except where such interests are overridden by the interests for fundamental rights and freedoms of the data subject which require protection under and finally, for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or in a third party to whom the data are disclosed under the Article 5 of the Turkish Personal Data Protection Law No. 6698. Besides, in order to provide you

higher quality service, improve our marketing and quality policies and offer you a tailor-made holiday experience which adjusts best for you, we evaluate certain personal aspects relating to our guests, in particular to analyse or predict aspects concerning your personal preferences, interests, habits and needs. Hence, your personal data will be processed legitimately to serve these aims which have mentioned earlier, in order to inform you for our campaigns, special offers, advertisements, discounts and similar commercial based activities. Additionally, **Duja** may contact you, for your reviews, opinions, feedbacks and complaints, special for marketing purposes alongside, improving our research and development works, management of your information technology and data security systems under the provisions of Turkish Personal Data Protection Law No. 6698.

HOW DO WE USE AND SHARE YOUR DATA

We use and transfer your personal information on the following basis under the Article 9 of the Turkish Personal Data Protection Law No. 6698,

For legitimate business purposes by the laws we are obligated to abide your personal data helps us to operate and improve our business and minimise any disruption to the services that we may offer to you. It also allows us to make our communications with you more relevant and personalised to you, and to make your experience of our services more efficient and effective;

- To Banks; in order to perform of contracts to which the data subject is party or taking steps at the request of the data subject prior to entering into a contract,
- To attorneys, tax advisors and our auditors regarding to for the establishment, exercise or defence of legal claims or proceedings,
- To government regulators, public authorities, courts, enforcement offices in order to the comply with legal and regulatory obligations, including financial reporting requirements imposed by the laws,
- To your delegates and attorneys, in order to perform your requests and wishes.

YOUR DATA PROTECTION RIGHTS

Regarding the personal data, data subjects holds the rights which mentioned below,

- to learn whether his personal data are processed or not,
- to request information if his personal data are processed,
- to learn the purpose of his data processing and whether this data is used for intended purposes, to know the third parties to whom his personal data is transferred at home or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of his personal data under the conditions laid down in Article 7,
- to request notification of the operations carried out in compliance with sub- paragraphs (d) and (e) to third parties to whom his personal data has been transferred,
- to object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- to request compensation for the damage arising from the unlawful processing of his personal data.

Regarding to your rights aforementioned, you are entitled to apply personally or with notary under the "The Declaration of Procedures and Principles of Applying to the Data Controller" to our registered e-mail address via secure electronic signature, mobile signature or with your registered e-mail address.

Your application will be responded under the provisions of the Turkish Personal Data Protection Law No. 6698 and in order to confirm your application, **Duja** may request further information for authentication purposes Our company keep this Privacy Policy under regular review and places any updates on this web page. This Privacy Policy was last updated on 30 April 2020.

HOW TO CONTACT US

Bodrum Hotel Management JSC – DUJA DİDİM

Central Registration System Number: 0178121720500004

E-mail link: kvkk@dujahotels.com

Address: Altinkum, 240. Sk. No : 13/ 2, 09270 Didim/Aydın