

This notice is provided under Personal Data Protection Law No. 6698 (the "Law"). Beşik İnşaat Taahhüt Turz. Tic. Ve İth. İhr. San. Ltd. Şti. is referred to as the "Company". The Company, as data controller, or its authorised person, provides this notice when obtaining personal data supplied within our contractual relationship about you or the representatives of the company you represent, to explain the procedures and principles for processing those data.

Principles for Processing Personal Data

Your personal data will be processed in accordance with the principles in Article 4 of the Law:

- Lawfully and fairly.
- Accurately and, where necessary, kept up to date.
- For specific, explicit and legitimate purposes.
- In a manner connected with, limited to and proportionate to the purposes of processing.
- Retained for the period prescribed by legislation or required for the purpose of processing.

We also process your personal data, as defined in the Law, only for the purposes and under the conditions specified in Article 5(2) and Article 6(3).

Accordingly, the Company processes personal data where:

- Processing is necessary for the Company's legitimate interests within our commercial or business relationship, provided that the data subject's fundamental rights and freedoms are not harmed.
- Processing is directly related to and necessary for the establishment or performance of a contract.
- Processing is necessary for the Company to fulfil a legal obligation.
- You have made the data public, and the Company's processing is limited to the purpose of making them public.
- Processing is necessary to establish, exercise or protect the rights of the Company, you or third parties.
- Processing is necessary to protect the life or physical integrity of the data subject or another person, and the data subject cannot express consent because of factual incapacity or the consent is not legally valid.
- Processing of special categories of personal data other than health and sexual life is provided for by law.

Purposes of Processing

Your personal data are processed for:

- Conducting activities in accordance with legislation.
- Following and conducting legal affairs.
- Conducting and auditing business activities.
- Managing contractual processes.
- Purchasing goods and services.
- Providing after-sales support for goods and services.
- Selling goods and services.
- Production and operational processes for goods and services.
- Customer relationship management.
- Customer satisfaction activities.
- Receiving and evaluating suggestions to improve business processes.
- Advertising, campaign and promotional processes.
- Following requests and complaints.
- Marketing goods and services.
- Marketing analysis.
- Providing information to authorised persons, institutions and organisations.
- Financial and accounting operations.

- Other purposes: ensuring reservation services, arranging rooms and managing the supply chain.

Processing, Retention and Collection Methods

We inform you that your personal data will be processed within our commercial or business relationship, in a manner connected with, limited to and proportionate to the purpose requiring processing, while preserving their accuracy and currency as provided by you or notified to us. They may be recorded, stored, retained, reorganised, shared with legally authorised institutions, transferred or assigned to third parties in Türkiye or abroad under the conditions prescribed by KVKK, classified and otherwise processed as listed in KVKK.

The Company attaches particular importance to personal data security and takes all necessary technical and administrative measures. After the service ends, identity and contact data detailed below will be retained for 10 years; special categories of personal data, visual and audio data, and family and relative data will be retained for 2 years, with all necessary technical and administrative measures.

Depending on the Company's services and commercial activities, personal data may be collected by automated or non-automated methods, orally, in writing or electronically, through Company units and offices, group companies, websites, social media, mobile applications, agencies and similar channels. They may be created, updated and processed as long as you benefit from products and services offered by the Company and its group companies.

Data may also be processed when you use our call centres or website to obtain services, visit the Company or its website, request Company services through agencies or attend Company training, seminars or events.

Personal Data Processed

Identity: First and last names, Turkish identity number, serial and sequence numbers.

Contact: Telephone and corporate telephone numbers, postal code, billing address, full address where you are a sole trader, workplace address, email and corporate email addresses.

Visual and Audio Records: Photographs of the natural person, audio and CCTV recordings.

Location: Room number where accommodation is needed, travel details, transfer details and transfer stop data.

Transaction Security: Internet access logs and entry and exit logs.

Physical Premises Security: Company employee entry and exit dates.

Other: Vehicle registration plate, supplier product acceptance information, agency or company information, occupation; and, for sole traders, bank account number, commencement date of activities and profit or loss for the last three years.

Recipients and Purposes of Transfers

With the necessary safeguards and subject to the conditions in this notice, collected personal data may be transferred to business partners, suppliers, Company officers, shareholders, legally authorised public bodies and private persons for:

- Work by business units to enable you to benefit from Company products and services.
- Customising and recommending those products and services according to your preferences, usage habits and needs.
- Ensuring the legal and commercial security of the Company, its group and business contacts, including communications-related administrative operations, physical security and supervision of Company locations, assessment of business partners, customers and suppliers and their representatives or employees, reputational research, legal compliance, auditing and financial affairs.
- Determining and implementing commercial and business strategies and carrying out guest service policies.

Where statutory obligations or the conditions in Articles 8(2) and 9(2) of KVKK apply, collected data are shared lawfully and fairly, accurately and currently, for specific, explicit and legitimate purposes and in a limited and proportionate manner. Recipients include banks, the Company's lawyer, judicial and administrative authorities

Personal Data Processing and Protection Supplier, Business Partner and External Service Provider Notice

requesting information, third parties providing services needed to achieve the stated purposes, and public bodies legally authorised to request the data.

Purposes include payments and collections, performance of contracts, exercising legal defence rights in potential disputes, investigations, judicial or administrative audits and similar matters, and responding to official or other lawful information and document requests.

Recipient	Definition	Purpose of transfer
Business partner (agency, customer, etc.)	Parties with which the Company establishes partnerships in its commercial activities, for purposes such as obtaining or selling services.	Limited to fulfilling the purpose of the partnership and assessing its representatives or employees.
Supplier	Parties providing products or services to the Company under a contract and in accordance with its instructions in the course of commercial activities.	Limited to ensuring the supply of outsourced products and services needed for the Company's commercial activities.
Company officers	Board members and other authorised natural persons.	Limited to physical security and supervision of Company locations, designing commercial strategies under applicable legislation, ensuring senior management and financial affairs.
Legally authorised public institutions and organisations	Public bodies authorised by legislation to obtain information and documents from the Company.	Limited to the purpose requested within their legal authority.
Legally authorised private-law persons	Private-law persons authorised by legislation to obtain information and documents from the Company.	Limited to the purpose requested within their legal authority.

Method and Legal Basis for Collecting Personal Data

When contracts, undertakings, protocols and similar documents are signed, we collect signature circulars submitted by authorised signatories as attachments. We process data by keeping printed copies and digital copies on a virtual server, transferring them to the relevant authorities in a possible dispute, and transferring them to authorised persons and institutions during contractual performance. Depending on the work and the data requested or requiring processing, automated or non-automated processing includes creating databases or lists, completing documents and forms and drafting petitions.

Measures to Protect Personal Data

Protecting personal data is important to the Company. Necessary technical and administrative measures are taken against unauthorised access, loss, misuse, disclosure, alteration or destruction. The Company undertakes to keep data confidential, exercise due care and take all necessary technical and administrative measures for confidentiality and security.

If personal data are damaged or acquired by third parties through attacks on the website or systems despite the Company's information security measures, we will immediately notify you and the Personal Data Protection Board.

Keeping Personal Data Accurate and Current

Persons sharing personal data with the Company acknowledge that accuracy and currency are important both to their rights under Law No. 6698 and under other legislation. They accept and declare that they bear responsibility arising from providing incorrect information.

You may notify the Company of changes or updates to the data you have shared by email or physical post.

Your Rights under Article 11 of the Law

- (a) Learn whether your personal data are being processed.
- (b) Request information if your personal data have been processed.
- (c) Learn the purposes of processing and whether your data are used accordingly.
- (ç) Learn the third parties to whom your data are transferred in Türkiye or abroad.
- (d) Request correction of incomplete or inaccurate data.
- (e) Request deletion or destruction of your data.
- (f) Request that the actions taken under subparagraphs (d) and (e) be notified to third-party recipients.
- (g) Object to a result to your detriment arising from analysis of your data exclusively by automated systems.
- (h) Request compensation for damage caused by processing contrary to the Law.

Depending on their nature, requests in your application will be concluded free of charge within thirty days at the latest. If the procedure incurs an additional cost to the Company, the fee in the tariff set by the Personal Data Protection Board in the Communiqué on the Procedures and Principles for Applications to the Data Controller may be charged.

For matters concerning the processing of personal data, complete the Company's application form and submit it in writing, by registered electronic mail, secure electronic signature, mobile signature or an email address previously notified to us and recorded in our records.

Depending on the reason for your request and the submission method, we may require additional verification, such as messaging or calling your registered telephone number, to establish that the application is yours and protect your rights. For example, if you apply through your registered email address, we may contact you through another registered channel and ask you to confirm the application.

How to Submit an Application

Under Article 13(1) of KVKK, you may submit a request to exercise the above rights in writing or by other methods determined by the Personal Data Protection Board. The channels and procedures for written applications under Article 11 are set out below.

You may obtain the KVKK Application Form, provide the information necessary to establish your identity, sign it and submit it to the Company.

- (i) Complete the form and deliver a copy bearing your handwritten signature in person or through a notary to the Company's postal address.
- (ii) Complete the form and send it to the Company's email address using your secure electronic signature under Electronic Signature Law No. 5070, mobile signature, or an email address previously notified to the data controller and recorded in its system.

A third party applying on a data subject's behalf must hold a special power of attorney issued through a notary by the data subject in that person's name.

Beşik Turizm may request information to establish whether the applicant is the data subject and may ask questions to clarify the matters stated in the application.

Requests submitted through the methods specified in the policy will be evaluated and concluded within 30 (thirty) days. Requests are normally free of charge, but the Company reserves the right to charge under the tariff determined by the Personal Data Protection Board.

Deletion, Destruction or Anonymisation of Personal Data

Under Article 7(1) of KVKK, when the purpose requiring processing ceases and any statutory periods have expired, personal data processed for the purposes in this notice will, on the Company's initiative or at your request, be deleted or destroyed, or anonymised and used thereafter in anonymised form, in accordance with the Company's Personal Data Retention and Disposal Policy.



CONTACT INFORMATION

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