

1. Introduction

The Ritz Carlton Istanbul (“**Ritz Carlton**” or “**Company**”), aims to process the personal data of their natural person customers in accordance with the provisions of the Law on Personal Data Protection No. 6698 (“**PDP Law**”) and other related legislations.

Your personal data, which you provided/will provide to our Company by reason of you being a natural person customer of our company and / or obtained by our Company by any external means, may be processed by our Company as “Data Controller”,

- In the context of the objective of processing your personal data and in connection with this purpose, in a limited and measured manner,
- By maintaining the accuracy and currentness of the personal data as reported or notified to our Company,
- May be recorded, stored, preserved, reorganized, and be transferred to the institutions authorized to request such personal data by law and shall be transferred, shared with and classified to third parties within the country or abroad under the conditions stipulated by PDP Law, that they may be processed in other ways listed under PDP Law and that they be subject to other procedures referred to in PDP Law.

2. Legal Reasons Regarding Processing of Personal Data

As the Ritz Carlton, in accordance with Article 5 of the PDP Law, our legal reason for the processing of personal data for matters where we have obtained explicit consent will be your explicit consent.

Our legal reason for the processing of personal data for performance of the services provided to you by us and the execution of the contract will be Article 5, Paragraph 2, Clause (c) of the PDP Law.

Our legal reason for the processing of personal data for the fulfillment of our legal obligations will be Article 5, Paragraph 2, Clause (ç) of the PDP Law.

Our legal reason for the processing of personal data for the institution, usage, or protection of a right will be Article 5, Paragraph 2, Clause (e) of the PDP Law.

Our legal reason for the processing of personal data for the legitimate interest of our Company will be Article 5, Paragraph 2, Clause (f) of the PDP Law.

Our legal reason for the processing of your personal data within the context of the Covid-19 Pandemic Response will be Article 5, Paragraph 2, Clause (ç) of the PDP Law; and our legal reason for your personal data of a special nature will be explicit consent.

3. Collection of Personal Data and Method

Your personal data are collected through all kinds of information, records and documents obtained from your statements both before and after the establishment of the contractual relationship and during the contractual relationship, third parties and public institutions and organizations for reasons specified in the law and through all physical and electronic means and cameras placed in the Company building for reasons specified in the law. Your personal data to be processed within the context of the Covid-19 Pandemic Response shall be collected via physically or electronically filled forms, your communications with our Company, and the thermal camera located at our Company premises.

management of requests regarding your food and beverage choices and the services offered by us to provide customized service, providing parking lot usage, recording of membership entries, follow-up of the lost and found goods, implementation of Company polices. Your Personal Data are transferred to Ritz Carlton and Marriott Hotels within the country and abroad for carrying out of customer loyalty programs and transmission of membership record, to parking lot company for the provision of parking lot usage, to suppliers and our business partners for the fulfillment of requests and choices notified to our hotel and parking lot company and to group companies for notifications.

Your personal data to be processed within the context of the Covid-19 Pandemic Response may be shared with the Turkish Ministry of Culture and Tourism, Ministry of Health, Province/District Directorates of Health, and other institutions that must be notified as per relevant regulations (e.g. relevant Governor’s Offices and law enforcement), for the purpose of fulfilling our legal obligations such as preventing Covid-19 from spreading, mitigating its effects, and ensuring occupational health and safety at the workplace.

5. Rights of the Customer

Pursuant to Article 11 of the PDP Law, you can make the following request regarding your personal data by applying to our Company:

- a. Learn whether or not your personal data have been processed,
- b. Request information as to processing if your data have been processed,
- c. Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- d. Know the third parties in the country or abroad to whom personal data have been transferred;
- e. In case the personal data is processed incompletely or inaccurately; requesting notification of the transactions made under this scope to third parties to whom personal data have been transferred;
- f. Request deletion, destruction or anonymization of personal data if the reasons for the processing have disappeared and request notification of the transactions made under this scope to third parties to whom personal data have been transferred;
- g. Object to occurrence of any result that is to your detriment by means of analysis of personal data exclusively through automated systems;
- h. Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

Our Company will conclude your requests arising from the PDP Law through the “Personal Data Subject Application Form”. Our Company will conclude the applications of personal data subjects according to nature of the request and within 30 (thirty) days at the latest as per Article 13 of PDP Law free of charge. If the request is rejected, the reason(s) for rejection shall be notified to you in writing or electronically.

4. Objective of Personal Data Processing and Transfer

Your personal data are processed for the purpose of fulfilling the legal obligations, establishing the contractual relationship, providing accommodation service, carrying out the identity confirmation for payment transactions, performing the customer loyalty program processes carried out by our hotels,

This Privacy Statement may be revised by the Company if deemed necessary. The current and detailed version of the Privacy Statement can be found at <http://www.somotelcilik.com>.

For questions regarding your Personal Data, you can contact us via info@somotelcilik.com ; privacy@marriott.com.