

**SOM OTELCİLİK VE TURİZM TİCARET ANONİM ŞİRKETİ- THE RITZ CARLTON
PRIVACY STATEMENT FOR CUSTOMERS RELATING TO THE PROTECTION AND
PROCESSING OF PERSONAL DATA**

Date of Revision:

13.02.2019

1. Objective

Som Otelcilik ve Turizm Ticaret Anonim Şirketi- The Ritz Carlton (“**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.

This Privacy Statement is adopted for the continuance and improvement of the activities carried out by Ritz Carlton in line with the principles set forth in the PDP Law.

2. Collection of Personal Data of Natural Person Customers and Method

Our company may process your personal data for the purposes specified in this Privacy Statement. If there are any changes in the purpose of processing your personal data, your consent will be obtained..

The personal data of customers collected and used by our company in particular are as follows:

	<i>Content of Personal Data</i>
Identification Data	Copy of driving license and ID containing information such as name-surname, T.R. ID number, tax ID number, citizenship, mother's and father's name, place of birth, date of birth, gender and signature/initial data
Communication Data	Telephone number, fax, address, country, city, e-mail address (including company e-mail)
Financial Data	Card number, type of card, expiry date, room number, provision receipt, payment information, information contained on the invoice, price
Special Categories of Personal Data	<ul style="list-style-type: none">• Health data• Blood type and religion section found on identity card/driving license
Other Data	Vehicle information, organization information, member number etc.
Professional Experience	Profession, occupational group, company name, title of the data subject etc.
Customer Transaction Data	Information about the use of products and services and the instructions and requests of the customer for the use of the products and services, information such as contract number, license plate, bank code, account number, duration of stay, room number, date of request
Physical Location Security Data	Vehicle photo, photo of the individual, camera recordings
Transaction Security Data	Personal data processed in order to ensure our technical, administrative, legal and commercial security when conducting business activities (Information used to associate the data subject with the transaction that is matched to said person and the information indicating that the person conducting the transaction is authorized to do so (password information)

Personnel Data	Photo
Marketing Data	The data from the booking screen during the booking process

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.

3. Objective of Personal Data Processing and Legal Reasons

Your Personal Data may be processed by our Company for, but not limited to, the following purposes.

Your personal data are processed with the aim of complying with The Regulation on the Relations of the Tourism Enterprises with the Ministry and with Each Other and Their Clients, Law on Reporting of Identity and fulfilling the legal obligations and requirements not limited with the abovementioned legislation.

In order to fulfill the obligations in accordance with The Regulation on the Relations of the Tourism Enterprises with the Ministry and with Each Other and Their Clients, Law on Reporting of Identity and other current legislation, laws, regulations and statements, in particular;

- Receiving customers' reservation requests,
- Making reservation transactions for the date requested by the customer,
- Receiving reservation information,
- Transferring the reservation confirmation to the customer and its storage,
- Check-in of the customer to the hotel and registration in the system,
- Reporting customer identification,
- Accommodation and check-out transactions,
- Conducting reservations via mobile application,
- Execution of bulk reservation transactions,
- Transfer reservations as per customer requests,
- Tour reservations as per customer requests,
- Providing laundry service to the customer

For the establishment of the contract, in particular;

- Delivery of the quote to the customer,
- Receiving credit card information for the payment,
- Identity authentication of the credit card information for the payment,
- Keeping the reservation information,
- Informing of VIP customers and customer preferences to hotel units,
- Tracking customer visitor information,
- Monitoring the check-out process through the mobile application,
- Delivery of daily analyses to units,
- Establishment of a contract with the agency,
- Mutual control of customer names,
- Delivery of provision information,
- Receiving specific requests of customers,
- Using pseudonyms for customer privacy,
- Notification of customer incidents and requests to hotel units,

- Monitoring of guest welcome process,
- Follow-up of newspaper preferences,
- Receiving invitation, meeting, wedding, organization requests,
- Giving price quotes,
- Notification of customer incidents to employees,
- Follow-up of customer feedback,
- Presentation of the leaders' meeting weekly,
- Evaluation of customers' comments,
- Making restaurant reservations as per customer requests,
- Issuance of customer card,
- Issuance of e-invoice to the customer,
- Inspection and classification by the income auditor,
- Reaching a consensus with transfer and touristic tour services and airport transportation services companies,
- Employee premium payments,
- Follow-up of the use of parking lot,
- Confirmation of guests who are attending the breakfast,
- Reservation at the hotel's bar, restaurant and spa services,
- Keeping the customer receipt,
- Follow-up of the housekeeping preference information of the guests to entering the hotel,
- Collection of information for the creation of spa membership and benefits,
- Identification of the customer membership,
- Follow-up of day-end closing,
- Tracking of lost and found goods,
- Record of the incident,
- Informing the head office,

For the, use and protection of a right, the necessity of data processing for the legitimate interest of the data controller and the application of our Company policies, in particular;

- Registration of the customer to the loyalty program for the collection of points according to the frequency of the accommodation,
- Collection of customer preferences,
- Collecting the information so that the customer can get maximum benefit from the spa therapy,
- Registration of customer membership and registration of spa reservations to the system,
- To follow-up of the removal of damaged material or gifts from the hotel guests outside of the hotel,
- Monitoring of vehicles entering the parking lot,
- Monitoring of the hotel via cameras,

Your personal data will be stored for a reasonable period of time until the expiry of its intended purpose or, until the end of statutory periods at latest.

4. Transfer of Personal Data to Third Parties

Your personal data can be transferred to General Directorate of Security, Ritz Carlton and Marriott Hotels within the country and abroad, to Ritz Carlton Company and related suppliers and business partners of our Company in order to fulfill the legal requirements of Law on Reporting of Identity and other legal obligations not limited to the above-mentioned laws and regulations and contractual obligations.

4.1. Transfer of Personal Data to Third Persons within the Country;

In order to fulfill the legal requirements of Law on Reporting of Identity and other related legislation, laws, regulations and statements, in particular;

- Identity reporting of the customer

In order to establish and execute the contract, in particular;

- Giving price quote to the customer,
- Submitting reservation confirmation to the customer,
- Establishment of contract with the agency,
- Ensuring mutual control of customer names,
- Providing the provision information,
- Establishment of contract with the customer for an organization,
- Making restaurant reservations as per customer requests,
- Keeping the customer receipt

For the necessity of data processing for the legitimate interests of the data controller and the application of our Company policies, in particular;

- Customer privileges by the collection of points at the Ritz Carlton hotels in within the country,
- Displaying the customer information in the Ritz Carlton hotels within the country for the improvement of services,
- Conducting transfer reservations as per customer requests,
- Conducting tour reservations as per customer requests,
- Reaching a consensus with transfer and touristic tour services and airport transportation services companies,
- Follow-up of the use of parking lot,
- Monitoring of the removal of the damaged material to the outside of the hotel,

4.2. Transfer of Personal Data to Third Persons Abroad;

Your Personal Data;

May be transferred to group companies abroad for

- Customer privileges by the collection of points at the Ritz Carlton hotels abroad,
- Displaying the customer information in the Ritz Carlton hotels within the country for the improvement of services,
- Incident reporting,
- Transferring of daily guest accommodation.

5. Privacy and Confidentiality of the Personal Data

In accordance with Article 12 of the PDP Law, our Company takes all necessary technical and administrative measures to prevent personal data being accessed and processed unlawfully, and that personal data is protected against unlawful access to personal data and to ensure that the appropriate level of security is provided for the storage of personal data.

5.1. Technical Measures Taken to Ensure the Legal Processing of Personal Data and Prevention of Unlawful Access to Personal Data

Without limitation to our current obligations, our hotel has taken the following measures:

- (1) notifying individuals of the collection and use of their data, including through the global privacy statement;

- (2) usage of the aforementioned data only for valid and commercial purposes;
- (3) to provide the individuals with means to review, correct, update, suppress, restrict, or delete their data, provided they comply with applicable laws;
- (4) require all service providers to which data is transferred to protect the security and confidentiality of the data;
- (5) to prevent unlawful access, acquisition, use, disclosure, loss or modification of personal data within their organization by taking necessary technical and organizational measures.

If you have other questions as a data subject, or if you want to make changes relevant to your personal data (such as requesting data to be deleted or updated), contact us by e-mail addresses privacy@marriott.com ; info@somotelcilik.com

For more information on the subject, please find Marriott Global Privacy Statement on the link <http://www.marriott.com/about/privacy.mi>

5.2. Administrative Measures to Ensure the Legal Processing of Personal Data and Prevention of Unlawful Access to Personal Data

- Training and raising awareness of company employees regarding PDP Law,
- In cases where personal data is transferred, the addition of clauses that ensure the provision of data security by the transferred party in the agreements that are concluded with the parties to whom the personal data are transferred,
- Determination of requirements of PDP Law and preparation of internal policies for its implementation.

5.3. Measures to be Taken in Case of Unlawful Disclosure of Personal Data

In the event that personal data is obtained by others by unlawful means, our Company shall notify the relevant data subject and the Board as soon as possible.

6. Deletion, Destruction, and Anonymization of Personal Data

Pursuant to Article 7 of the PDP Law, despite the fact that the personal data is processed in accordance with the relevant legislation, if the reasons for the processing of personal data are eliminated, personal data are deleted, destroyed or anonymized by the Company ex officio or upon the request of the personal data subject.

The procedures and principles related to this matter shall be fulfilled in accordance with the PDP Law and the secondary legislation to be established on the basis of this Law.

6.1. Methods of Deletion and Destruction of Personal Data

Personal data collected in accordance with company procedures will be safely destroyed / deleted by the expert.

6.2. Methods of Anonymization of Personal Data

Anonymization signifies rendering the personal data in such a manner that the personal data can no longer be attributed to an identified or identifiable data subject by the use of an encryption method even with the use of additional information.

7. Rights of Customer

Pursuant to Article 11 of the PDP Law, you can make the following requests 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”. 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 communicated to you in writing or electronically.

This Privacy Statement may be revised by the Company if deemed necessary. In case of revision, you will be informed about the update. The most up-to-date Privacy Statement may be found on <http://www.somotelcilik.com>.