

**SOM OTELCİLİK VE TURİZM TİCARET ANONİM ŞİRKETİ- THE RITZ CARLTON
PRIVACY STATEMENT FOR EMPLOYEES 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 employees 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 employee 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 Employees 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 employees 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, marital status, mother's and father's name, date of birth, place of birth , citizenship and gender and , , social security number and signature/initial data |
| Communication Data | Telephone number, address, country, e-mail address internal contact information (including extension number and company e-mail) |
| Financial Data | Financial and salary details, expenses, payrolls, premium rights, premium and bonus amounts, bank account number, IBAN number etc. |
| Special Categories of Personal Data | <ul style="list-style-type: none">• Criminal conviction• Medical report, blood type,• Trade union information, association / club memberships• Congenital / chronic disease, immunization tetanus / hepatitis etc. Disease |

| | |
|--|---|
| | <p>information, medical history, physical examination results, laboratory findings as part of Entry into Job/Periodical Inspection Form</p> <ul style="list-style-type: none"> • Devices and prostheses listed on driving license (photocopy of driver's license) • Criminal record, criminal convictions and security measures • Disabilities • Blood type and religion section on the identity card • Race and ethnic origin |
| Customer Transaction Data | Company name, date, description, data on daily reports |
| 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 (external IP number of the computer, password information) |
| Professional Experience Data | Information such as title, duty, performance, commencement date and term of employment etc. |
| Audio Visual Data | Descriptive pictures, photographs and camera recordings (except recordings in the Physical Location Security Data), sound recordings (eg. voice call recordings) |
| Physical Location Security Data | Vehicle photo, photo of the individual, camera recordings |
| Personnel Data | All kinds of personal data processed to obtain the information that will be the basis of the personnel benefits of natural persons under employment relationship with our company information (Passport photo, diplomas, certificate information, date of start and termination of employment, identification data in the personnel file, job application form, education information, graduation information, profession, previous work place, CV, information regarding the subsistence allowance, private pension scheme information). |
| Other Data | Total staff, key code, termination process, number of children, family information, number of emergency team employees, field/code of activity |
| Risk Management | Date of risk, sphere of influence, worth of risk, conclusion and explanations |

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 employment contract and during the employment relation and from third parties, information notified by you through human resources practices, cameras placed in all locations belonging to the Company, all landline and mobile phone records given to you by the Company, all files and records on all tools such as instruments, desktop computers and portable computers.

3. Objective of the Processing of Personal Data of Employees and Legal Reasons

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

Your personal data is processed with the aim of complying with Labor Law, Turkish Code of Obligations, Social Security and General Health Insurance Law, Tax Procedure Law, Corporate Tax Law, Law on Occupational Health and Safety, Law on Reporting of Identity, Law on Private Security Services, Regulation on Duties, Authorities, Responsibilities and Training of Occupational Physicians and Other Health Personnel, Regulation on Hygiene Education and for the purpose of fulfilling the legal obligations

and requirements not limited to the above-mentioned laws and regulations and requirements of the Employment Contract.

In order to fulfill the legal obligations in accordance with Labor Law, Turkish Code of Obligations, Social Security and General Health Insurance Law, Tax Procedure Law, Corporate Tax Law, Law on Occupational Health and Safety, Law on Reporting of Identity, Law on Private Security Services, Regulation on Duties, Authorities, Responsibilities and Training of Occupational Physicians and Other Health Personnel, Regulation on Hygiene Education, Personal Pension Savings and Investment System Law numbered 4632 and other current legislations, laws, regulations and declarations, in particular;

- Follow-up of the premium payments,
- Transfer of premium data,
- Preparation of Occupational Health and Safety (“OHS”) documents, follow-up of training participations,
- Creation of personnel file,
- Notification of Minimum Living Allowance,
- Keeping the data of employee’s blood type and contact person for emergency situations,
- Collecting health documents for employment,
- Pre-employment/periodic examination,
- Issuing prescriptions for employees,
- Reporting of identity,
- Conducting payroll transactions,
- Receiving advance requests,
- Overtime payment,
- Follow-up of leave,
- Mandatory private pensions,
- Provision of temporary employees,
- Declaration of corporate tax return,
- Monthly premium and service notification,
- Notification of the employees who will attend hygiene training to the education academy,
- Entry of hygiene education to MEB (Ministry of National Education) system,
- Notification of security officers,
- Monitoring of employee injuries,
- Transfer of personnel credentials to the police when VIP guests are accommodated,
- Monitoring of emergency teams,
- Notification to police department,
- Follow-up of risk analysis and evaluation,
- Establishing emergency action plan,
- OHS event and detection notification,
- Follow-up of OHS training participants

For the establishment and execution of the employment contract, in particular;

- Follow-up of shifts,
- Tracking Upsell data statistics,
- Delivery of daily analyses to the units,

- Establishment of contract with the agency,
- Follow-up of customer visits,
- Collection of customer preferences,
- Informing the hotel units about customer incidents,
- Follow-up of the guest welcome process,
- Employee activity monitoring,
- Informing the employees about customer incidents,
- Follow up of training participation status,
- Establishment of quality development teams,
- Keeping managers' information,
- Delivery of documents for visa procedures,
- Follow-up of employees receiving orientation training,
- Follow-up interview results of candidate employees,
- Establishment of employment contract,
- Obtaining commitment from the employee regarding the compliance of the data security within the company and Personal Data Protection Law,
- Entry of the employee to the system,
- Procedures regarding termination of employment contract,
- Follow-up of performance evaluation processes,
- Identification and follow-up of the building entry card,
- Arranging business trips,
- Inspection and classification by the income auditor,
- Salary payments,
- Provision of business cards,
- Keeping employee information,
- Registration of guest preferences,
- Monitoring of the accommodation information of the guests who will enter the hotel,
- Tracking of lost and found goods,
- Record keeping of incidents,
- Tracking visitor records,
- Tracking of key handover,
- Identity authentication when handing over the keys,
- Entrusting the keys to employees,
- Supply of cupboard,
- Keeping the list of employees who have access to the system room,
- Monitoring the delivery of weapons to security workers,
- Follow-up of removal of damaged materials or gifts received from guests outside the hotel,
- Tracking of guest injuries,
- Notifications to the head office,
- Follow-up of posts and incoming vehicles,
- Tracking employee contact information,
- Liability insurance for private security employees,
- Creation of intern files.

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;

- Monitoring employee productivity,
- Monitoring of employee accommodation,
- Follow-up of event participants,
- Celebration for the personnel who have completed 5/10/15 years,
- Calculation of employee progress payments,
- Follow-up of employee processes such as employee promotions / position changes,
- Setting-up the passenger service for the employees,
- Follow-up of the use of parking,
- Supply of portable tools to employees,
- Supply of clothes to the employees,
- Monitoring of the hotel with 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 of Employees to Third Parties

Your personal data can be transferred to the insurance company, the agency, the relevant bank, the General Directorate of Security, the plumbing company, the Revenue Administration, the District Police Department, the relevant training academy, the printing company, Marriot Hotels Company, all Ritz Carlton and Marriott Hotels within the country and abroad and related suppliers and business partners of our Company in order to comply with Law on Reporting of Identity, Personal Pension Savings and Investment System Law numbered 4632, Labor Law, Corporate Tax Law, Regulation on the Payment of Wages, Premiums, Bonuses and the Remunerations of this Nature through Banks, Regulation on Hygiene Education, Regulation on Emergency Situations at Workplaces, Law on Private Security Services and for the purpose of fulfilling the legal obligations not limited to the above-mentioned laws and regulations and requirements of the employment contract.

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, Personal Pension Savings and Investment System Law numbered 4632, Labor Law, Corporate Tax Law, Regulation on the Payment of Wages, Premiums, Bonuses and the Remunerations of this Nature through Banks, Regulation on Hygiene Education, Regulation on Emergency Situations at Workplaces, Law on Private Security Services and other related current legislation, laws, regulations and statements, in particular;

Your personal data may be transferred for;

- Notification of employee identity ,
- Mandatory individual pensions,
- Provision of temporary employees,
- Declaration of corporate tax return,
- Declaration of employee's monthly premium and service,
- Salary payments,
- Notification of the employees who will attend the hygiene training to the education academy,
- Introduction of hygiene education to MEB system,

- Notification of security employees,
- Transfer of the employee identification information to the police when VIP guests are accommodated,
- To General Directorate of Security for notification.

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

- Establishment of the contract with the agency,
- Displaying the customer information in the Ritz Carlton hotels within the country for the improvement of services.

4.2. Transfer of Personal Data to Third Persons Abroad;

Your personal data may be transferred for,

- Displaying the customer information in the Ritz Carlton hotels abroad for the improvement of services,
- Celebration for the personnel who have completed 5/10/15/20/25 years,
- Giving system privileges to the employee at Ritz Carlton Company abroad,
- Employee injury notifications,
- To group companies abroad for civil defense plan notification.

5. Rights of Employee

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>.

Name-Surname of the Employee:

Date:

Signature: