

**SOM OTELCİLİK VE TURİZM TİCARET ANONİM ŞİRKETİ- THE RITZ CARLTON
PRIVACY STATEMENT FOR SUPPLIERS 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 supplier 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 supplier 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 Suppliers 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, you will be asked for additional consent.

The personal data of suppliers 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, signature/initial data, citizenship, mother's and father's name, place of birth, date of birth and gender.
Communication Data	Telephone number, address, country, e-mail address (including company e-mail).
Financial Data	Bank information (account no, IBAN no), data contained in the declaration processes
Other Data	Certificate of activity, tax plate, trade registry gazette, billing address, signature circular, Trade Registry Gazette payment period etc.
Customer Transaction Data	Information regarding the use of products and services and the instructions and requests of the customer for the use of the products and services (type of payment document, date, serial-order number, etc.)
Professional Experience Data	Data on the diploma, date / serial of occupational physician certificate
Physical Security Data	Camera recordings

Our Company collects your personal data through all kinds of information, records and documents obtained from your and/or your company's statements both before and after the establishment of the contractual relationship and during the contractual relationship, all kinds of records and documents obtained in physical or electronic media, all physical and electronic setting and cameras placed in the Company building for reasons specified in the law in order to fulfill its legal obligations.

3. Objective of the Processing of Personal Data 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, Regulation on Duties, Authorities, Responsibilities and Training of Occupational Physicians and Other Health Personnel, Law on Occupational Health and Safety, Tax Procedure Law, Income Tax Law and for the purpose of fulfilling the legal obligations and requirements not limited to the above-mentioned laws and regulations.

In order to fulfill the legal obligations in accordance with The Regulation on the Relations of the Tourism Enterprises with the Ministry and with Each Other and Their Clients, Regulation on Duties, Authorities, Responsibilities and Training of Occupational Physicians and Other Health Personnel, Law on Occupational Health and Safety, Tax Procedure Law, Income Tax Law and other current legislations, laws, regulations and declarations, in particular;

- To make tour reservations in accordance with customer demands,
- Pre-employment/periodic examination,
- Stamp tax declaration,
- Notification of purchase and sales of goods and services,
- Declaration of withholding tax returns, value added tax returns, provisional tax returns, corporate tax returns,

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

- Transfer reservations as per customer requests,
- Tour reservations as per customer requests,
- Collection of necessary documents from the new suppliers,
- Approval of the relevant managers regarding new suppliers,
- Registration of supplier card,
- Monitoring of invoices from companies that provide Casual service,
- Reaching consent with the companies providing tour services,
- Recaching consent with the companies providing airport private passenger service,
- Identification of the supplier to the system,
- Tracking the information of employee service drivers,
- Collection of invoices and forwarding to the finance department,
- Creation of spa membership for customer,
- Collecting the information so that the customer can get maximum benefit from the spa therapy,
- Opening a membership record in the system to the customer,
- Reporting of day-end closing

For the legitimate interest of the data controller and the application of our Company policies, in particular;

- 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 for statutory periods at latest.

4. Transfer of Personal Data to Third Parties

Your personal data can be transferred to the Revenue Administration and related suppliers of our Company in order to comply with Income Tax Law, Corporate Tax Law, Tax Procedure Law 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 Income Tax Law, Corporate Tax Law, Tax Procedure Law and other related current legislation, laws, regulations and statements, in particular;

Your personal data may be transferred for;

- Stamp tax declaration,
- Notification of purchase and sales of goods and services,
- With the purpose of declaring the withholding tax returns, value added tax returns, provisional tax returns, corporate tax returns to authorized public institutions and organizations.

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 the 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> or visit <http://www.somotelcilik.com>

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 Supplier

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>.