



## SSB TURİZM İNŞAAT İÇ VE DIŞ TİCARET LTD. ŞTİ.

### LAW ON PROTECTION OF PERSONAL DATA NO.6698 (LPPD) INFORMATION AND DISCLOSURE TEXT

Our company attaches great importance to the processing and protection of your personal data in accordance with the Law on the Protection of Personal Data No. 6698 ("LPPD") and the relevant legislation with this clarification and information text.

Our company, which is the data controller takes all necessary technical and administrative measures in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data, to protect personal data.

Pursuant to Article 10 of the Law; within the scope of our company's activities, we inform you with policies and with this clarification text, which established to cover guests, potential guests, suppliers, subcontractors, service providers, employees and representatives, business partners, company partners, employees, employee candidates, interns, visitors, employees of public institutions and organizations and private law legal entities and relevant third parties.

This disclosure text is prepared by SSB TURİZM İNŞAAT İÇ VE DIŞ TİCARET LTD ŞTİ ("**Company/Radisson Blu Ottomare**") as the data controller within the scope of the Article 10 of the Law on the Protection of Personal Data No.6698 (the "Law") and the Communiqué on the Procedures and Principles for Fulfilling the Obligation of Disclosure.

#### 1-Data Controller:

SSB TURİZM İNŞAAT İÇ VE DIŞ TİCARET LTD. ŞTİ. ("Company – Radisson Blu Ottomare") (Kazlıcesme Mah. Abay Cad. No: 223/A Zeytinburnu Istanbul Turkey, Tax Administration/Tax Number: Zeytinburnu/7810472554, Mersis No. 07810472554000014, Trade Registration Number: 791 977) processes your personal data in the capacity of "Data Supervisor" defined in Article 3 of the Personal Data Protection Law No.6698.

#### 2-The Purpose of Processing Personal Data:

Your personal data which are collected within the scope of the Law on the Protection of Personal Data No.6698 are obtained, recorded, stored, modified, rearranged and processed in accordance with the principles stipulated in the law, fully or partially, automatically or non-automatic means provided that it is a part of any data recording system.

Your personal data are processed within the scope of company activities in accordance with the relevant legislation for the following purposes. According to this;

- Taking advantage of the products and services offered by Radisson Blu Ottomare (the Company) ; Providing them to be customized according to your tastes, habits and needs of the products and services offered,
- Ensuring that you are informed about the general and special campaigns, promotions, discounts and advantages offered by 'Radisson Blu Ottomare (Company)',
- Performing the Radisson Rewards card membership and registration for the Radisson Blu Ottomare (Company) loyalty program and to inform you about our new services and products to be offered by our company, as well as changes and innovations in personal data policies and membership conditions,
- Ensuring the legal and commercial security of the company and the persons who are in business relations with the company,
- Carrying out reservation, transportation, sales, accommodation, after-sales support services within the scope of company activities, benefiting from discounts for guests,
- Improving company services, to continue corporate development activities, to continue advertising and marketing activities,
- Maintaining the financial and accounting, administrative, legal, technical business processes of the company,
- Ensuring guest satisfaction, maintaining the request and complaint processes of the guests, following the complaint information received on the internet and social media, and the request, suggestion and complaint notification processes collected through online channels,
- Planning and executing human resources processes, fulfilling the employment application processes, creating personal files for employees, fulfilling financial obligations, determining company wage policy,
- Making and executing contracts and protocols with the company's guests, potential guests, suppliers, intermediary institutions, agencies, rental companies, employees and relevant third parties,
- Carrying out the work and transactions and processes before the KVK Institution within the scope of the KVK Law,
- In the legal disputes of the company with third parties, burden of proof as evidence,
- Using our web pages and mobile applications related to company activities
- Conducting sales transactions to relevant persons and organizations regarding products and services, following up sales transactions, performing banking transactions and payment processes with credit cards, mail orders, bank transfers and other commercial payment tools,
- Ensuring the physical security of the company's buildings and extensions, following up the personnel's employment processes, ensuring the control of company building entrances and exits
- Fulfilling the obligation of identity verification and notification of identity in order to fulfill the legal obligations stipulated in the relevant legislation and to ensure security,
- Notifications to relevant public institutions and organizations, including Police Directorates, Revenue Administration, Tax Offices, Finance, SSI,

For below mentioned purposes, your personal data are processed in accordance with the conditions and purposes determined in accordance with Articles 4, 5 and 6 of the LPPD. Your personal data are not used for any purpose other than our company's activities.

In line with the purposes written above, limited to the company's activities, your personal data written below are processed.

- Your identity information (TR/Foreigner Identity Number, name and surname, place and date of birth, mother and father name, marital status, gender, passport information, information on your driver's license, your identity card or other population on the identity sharing system ID information)
- Your contact information (your phone numbers, contact address, e-mail address)
- Your location information (license plate information, address, location information of your location)
- Guest Transaction/Accommodation Information (Reservation information, arrival at the hotel, date of departure from the hotel, room information, number of days to stay, identity, contact, proximity information about the guests staying at the hotel, bank, credit card, mail order, invoice, payment information, forms and records of guests exhibiting inappropriate behavior, signature circular, power of attorney, contract information)
- Request and Complaint Information and records collected from electronic and physical media regarding the requests and complaints of people benefiting from products and services, complaint information received via internet and social media, online channels)
- Personal Information (Employment contract, education, diploma information, certificate information, SSI employment entry, exit declaration, GSS login information, identity information written on the family status declaration, dependents, spouse, child proximity information, registration information of family members, debit document, employment certificate, resignation, termination, severance and notice pay payroll, salary payroll information, disciplinary investigation information, SGK registration number, service statement, background information, leave information, personnel performance evaluation reports, occupational accident information, information in the job application form, reference, information, Bank account information, IBAN number information)
- Legal Transaction Information (Personal information in correspondence with judicial authorities, information in lawsuits and enforcement files)
- Lost Property Information (Information on the property found in the found property report, name, surname, date, time, signature information of the person found)
- Information shared on Social Media and Internet Sales Sites (The information shared by the people who benefit from our products and services using our social media accounts, the identity, communication, location, bank, payment that the people who receive the services and products consent to share via the websites abroad and domestic agencies, financial information)
- Physical Space Security Information (Entry and exit registration information of guests, potential guests, employees, employee candidates, interns, suppliers, service providers and visitors who benefit from our products and services, our hotel and its additions, your camera recording images if you visit our offices, your vehicle license plate information if you use our parking lot, the information on the forms you have filled out)

- Professional experience information (education information, diploma information, working life, reference information, courses attended, in-service training information, certificates, driving license, other information on the notified forms)
- Visual Records (Photo information on the completed, printed forms, documents and official identity documents, photographs taken as part of job application and company activities, advertising, marketing, web page in company campaigns, social media accounts or third-party social media channels, shared your photos, your images in camera recordings)
- Health Information (Health reports, blood group information, personal health and physical disability information, information about health tests)
- Information on Criminal Convictions and Security Measures (Criminal record, conviction, legal status information)
- Within the scope of lease agreements made with our company, identity, contact, location, bank, financial information, signature circular, power of attorney, contract information on the lease agreements,
- Voice recordings recorded through corporate call center services performed on behalf of Radisson Blu Ottomare (Company), information processed, recorded, obtained through tourism agencies providing intermediary services, third party websites, your personal information obtained by e-mail, letter or other communication means.

### **3. To whom and what purpose the processed personal data can be transferred**

Your personal data processed by our company are transferred to the relevant real and legal persons in Turkey and abroad for the following purposes in accordance with Articles 8 and 9 of the Law No. 6698 on PDP. Accordingly;

- Limited with the company's activities; to our business/solution partners, service providers, suppliers, performance assistants and company partners and company officials,
- In the relevant legislation within the scope of identity verification and identification obligation to the relevant Police Directorates in order to fulfill the stipulated legal obligations and to ensure security,
- With the scope of operations of the Company, to Tourism and Revenue Administration, Tax Administration, Finance, SSI, Turkey related to public institutions and organizations, including the Business Council,
- In order to carry out the occupational health and safety processes of the relevant persons, within the scope of occupational health and safety measures, the health information of the employees to the persons and organizations and insurance companies,
- To banks, financial institutions, public and private legal entities, public officials in order to carry out the financial transactions of the relevant persons,
- To prosecutors, courts, enforcement offices and relevant legal institutions and organizations in matters relating to public security and legal disputes, on demand and with the purpose of request as per legislation,

- To software, hardware, informatics and technology companies in Turkey and abroad in order to install computer operating systems and computer programs used within our company, to carry out maintenance and repair operations of programs,
- In order to ensure the security of the electronic data of the company, it is transferred to the information technology companies located in Turkey and abroad.
- Even if personal data of special nature is transferred domestically, your personal data can be transferred in cases stipulated by law in terms of private personal data other than health and sexual life, by obtaining the express consent of the relevant person.
- Your personal data are transferred to tourism agencies in Turkey and abroad, third-party websites conducting sales and marketing, insurance companies, notaries, banks, financial institutions that mediate the delivery of our products and services over the Internet.
- To judicial authorities, municipalities, tax offices, banks, land registry and cadastre offices in order to manage and monitor immovable property transactions,
- For the purposes of sales, marketing and advertising, your personal data are transferred to third parties related to advertising and marketing companies for the interests of the company.

Along with the relevant person groups listed above, consultants, agencies, brokerage firms, employees of our company, company partners, legal, financial and tax consultants, auditors, public institutions within the scope of company activities, ministries and provincial organizations, authorized public institutions and organizations such as judicial authorities. Your personal data is transferred to persons, institutions and organizations permitted by the provisions of the payment service legislation, in accordance with the legislation and limited to the purpose of transfer.

#### **4. Data Transfer Abroad:**

Data can be transferred in accordance with the principles regulated in article 4/2 of the PDP Law by receiving Explicit Consent Texts related to the personal data processed to be collected separately from the persons whose personal data we have processed or in the cases stipulated in articles 5/2., 6/3. of the Law without seeking express consent, in accordance with the rules in article 9 of the Law, after the foreign countries with sufficient protection to be determined by the Personal Data Protection Board ("Board") are announced, to only persons and organizations residing in these countries, for countries that are identified and declared lacking adequate protection and provided that those responsible for the data in the relevant foreign country and Turkey undertake an adequate protection in writing and the necessary permissions are obtained from the PDP Board for the relevant transfer and the data is limited.

Limited to the activities of our company, applications, software programs, call centers, websites, social media accounts, mobile applications used in connection with the Raddisson Blu Hotels chain headquartered abroad, Your personal data are transferred abroad under the loyalty program through Radisson Rewards card membership applications. In this context, within the framework of the limits stipulated by the law numbered 6698, taking all necessary precautions, within the scope of your legal relationship with our Institution and your activity, your personal information may be transferred abroad in accordance with the legislation and limited to the purpose of transfer.

## **5. The method and legal reasons for collecting personal data:**

Your personal data are processed and collected for purposes filling out application forms, contracts, arranging printed forms, creating membership through technological software programs used in electronic environment, e-mail, filling application forms, creating personal files, processing financial information for drafting and executing contracts, establishing and maintaining accounting, financial and social rights, in order to realize sales transactions and to ensure corporate development within the scope of company activities limited to the stated purposes. They are processed and collected in non-automatic ways provided that they are fully or partially automatic or part of any data recording system by using the video camera recording system in order to ensure indoor and outdoor security in company buildings and extensions, using fingerprint system, which is a personnel attendance control system, in order to evaluate the performance of company employees for the reasons of your express consent, using complaint management systems, market research companies and reference methods, visiting the company buildings and extensions, website, using of mobile applications, calling our call services. In addition, your personal information are processed and collected through audio recordings recorded by corporate call center services performed on behalf of Radisson Blu Ottomare (Company), tourism agencies providing intermediary services, information recorded, obtained through third party websites, e-mail, letters or other communication tools.

In accordance with the legal regulations that our company is subject to, your personal data and special quality personal data are processed, as a rule, based on the explicit consent of the relevant person in order to provide products and services by our company and to fulfill our company's obligations arising from contracts and legal regulations in a complete and correct manner. In addition, within the scope of your contact with our company, your personal data is processed without seeking explicit consent in the following cases. It is necessary to process personal data belonging to the parties of the contract, provided that it is directly related to the establishment or execution of contracts between our company and third real and legal persons,

- In the event that it is mandatory for the company to fulfill its legal obligation,
- In the event that personal data is revealed to the public by the person concerned himself/herself.
- In the event that data processing is mandatory for the establishment, use or protection of a right,
- Provided that it does not harm the fundamental rights and freedoms of the person concerned, it is an obligation to process data for legitimate interests of the data officer.
- In the event that it is clearly stipulated by the laws,

They are processed, collected and transferred in accordance with Articles 5 and 6 of the Personal Data Protection Law No.6698 and 5/1-h article of the Communiqué on the Procedures and Principles for Fulfilling the Disclosure Obligation limited to the stated purposes.

## **6. Rights of Personal Data Owner (Right of Application):**

You can submit your application your requests within the scope of Article 11 "regulating the rights of the person concerned" of the Personal Data Protection Law No.6698 to Data Supervisor according to the Communiqué on Application Procedures and Principles to as data controller SSB

TURİZM İNŞAAT İÇ VE DIŞ TİCARET LTD. ŞTİ. Kazlıçeşme Mah. Abay Cad. No: 223 Zeytinburnu Istanbul Turkey address, filling out the attached APPLICATION FORM of the person concerned who is the Personal Data Owner, you can personally transmit a signed copy of the form to the company address with documents identifying you, by sending an e-mail to info.ottomare.istanbul@radissonblu.com by using Secure Electronic Signature, mobile signature or the Electronic Mail address registered in our company's system, by using the Personally Registered Electronic Mail (KEP) address of the relevant person, by sending an e-mail to sbsturizm@hs02.kep.tr to our company's Registered Electronic Mail (KEP) address, through your personal application and a notary or the methods determined by the PDP Authority.

**In accordance with Article 11 of the Law; everyone has below mentioned rights by applying to the data controller regarding himself;**

- To learn whether personal data has been processed or not,
- To request the relevant information if personal data has been processed,
- To learn the purpose for the processing of personal data and whether those have been used in accordance with the purpose or not,
- To know the third parties to whom personal data has been transferred within Turkey or abroad,
- To request the rectification of the data in the event they are processed incompletely or inaccurately,
- To request the erasure or destruction of his personal data under the conditions specified in Article 7 of the PDP Law,
- Requesting that the correction, deletion or destruction of personal data be notified to third parties to which personal data is transferred,
- To object to the appearance of a result against the person himself due to analyzing the processed data exclusively through automated systems,
- Claiming compensation in the event that the person suffers loss due to illegal processing of the personal data.

You must submit your applications to use your above-mentioned rights in writing or by the above written methods determined by the PDP Authority in accordance with the article 13/1. of LPPD No. 6698. Our company will finalize your requests in the application, free of charge, as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board will be requested. In this context, if the application of the relevant person is answered in writing, no fee will be charged up to ten pages, and a transaction fee of 1 TL will be charged for each page above ten pages. If the response to the application is given in an electronic recording medium such as CD or flash memory, the fee that may be requested by our company will not exceed the cost required by the recording medium.

**\* [Click for Application Form](#)**