



CLARIFICATION TEXT

The details of the statements made in this this clarification text can be found in the privacy policy and the documents in its annexes, which have been prepared and implemented in accordance with the Personal Data Protection Regulation and the Personal Data Protection Act No. 6698 (KVKK) by the SPA, Sauna and Massage Establishments (hereinafter referred to as LIU RESORTS) in this accommodation facility of RR TURİZM YATIRIMLARI ANONİM ŞİRKETİ, the data controller. Accordingly;

1. Your personal data processed

- a) **Identity and family information** [first name/last name, Turkish ID number, passport number, place and date of birth, marital status, gender, name, number, age and date of birth of children, signature, voucher (travel card) and tab (accommodation card) details, room type and number, flight number, hotel, dates and amount of accommodation].
- b) **Contact information** [address, telephone number, e-mail address].
- c) **Customer transaction information** [(vehicle registration number, survey form, records of provision of products and services, enquiries, instructions, photographs, marriage, birth, special anniversaries, billing information, ordering information, requisition information]
- d) **Physical space security information** [customer and visitor entry and exit registration information, camera records,]
- e) **Transaction security information** [IP address, hotspot records, password and password information, website login and logout information, log and digital traffic records,]
- f) **Financial information** [credit card number, store card code, expiry date].
- g) **Audio-visual records and information** [Audio-visual records and information].
- h) **Health information** [information on disability status, chronic diseases, previous diseases, asthma, diabetes, heart and blood pressure diseases, personal health information,]

2. The nature of the collection of your personal data and its legal basis

Pursuant to this clarification text, your personal data will be collected orally, in writing, electronically or by non-automated means where it is part of the automated or data collection system, from third parties with whom we work, from solution partners with whom we have a contractual relationship and with whom we have an agreement as a condition of operating and providing services, or through information, documents and similar means provided by you.

These data may be processed directly on the basis of your express consent within the framework of Article 5 of KVK Law No. 6698, as well as in cases where your consent is not required, in the presence of the following conditions. Accordingly;

- a) When expressly required by law.
- b) When it is necessary for the protection of the life or physical integrity of the person who cannot give consent due to actual impossibility or whose consent is not legally valid.
- c) When it is necessary to process personal data of the contracting parties, provided that this is directly related to the establishment or performance of a contract.
- d) When the processing is absolutely necessary for the data controller to comply with its legal obligations.
- e) When it has been made public by the data subject himself/herself.
- f) When processing is absolutely necessary for the establishment, exercise or protection of a right.
- g) When the processing is necessary for the purposes of the data controller's legitimate interests, provided that the fundamental rights and freedoms of the data subject are not thereby prejudiced.

Within the framework of Article 6 of Law no. 6698 on the protection of personal data, your sensitive personal data other than those relating to health and sexual life may be processed on the basis of your express consent or in the cases provided for by law, in accordance with the provision of the same article. In the absence of your express consent, your personal data relating to health and sex life may only be processed by persons bound by professional secrecy or by authorised bodies and organisations for the purposes of public health protection, prevention, medical diagnosis, treatment and care, planning and management of health services and financing.

3. Purpose of the processing of your personal data

In accordance with Articles 4, 5 and 6 of the Personal Data Protection Act No. 6698, your personal data will be processed for the purposes listed below, taking into account the principles of lawfulness and good faith, that they must be accurate and up to date, that they are processed for specified, explicit and legitimate purposes, that they are related to the purpose for which they are processed, that they are limited and adequate for the purpose for which they are processed and that they are kept for the period provided for by the relevant legislation or necessary for the purpose for which they are processed.

1. Implementation of emergency management processes
2. Implementation of information security processes
3. Carrying out activities in accordance with legislation
4. Performance of financial and accounting matters
5. Carrying out corporate/product/service fidelity processes.
6. Ensuring physical space security
7. Pursuing and executing legal matters
8. Carrying out communication activities
9. Carrying out sales processes for goods/services
10. Carrying out production and operational processes for goods and services
11. Execution of customer relationship management processes
12. Carrying out customer, guest satisfaction and service quality activities
13. Organisation and event management
14. Implementation of advertising/campaign/promotion processes
15. Carrying out storage and archiving activities
16. Execution of contract processes
17. Follow-up of enquiries/complaints
18. Ensuring the security of data processing
19. Carrying out investment processes
20. Providing information to authorised persons, institutions and organisations
21. Carrying out management activities
22. Creation and monitoring of visitor data

Your personal data will only be processed for the purposes stated above. The company takes all possible technical and administrative measures to prevent unlawful processing or unlawful access to personal data.

4. Transfer of your personal data

Your personal data may be transferred domestically and abroad in accordance with Articles 8 and 9 of the Personal Data Protection Act No. 6698 if the following conditions are met.

Personal data received by us due to the existence of the conditions of Article 5 of the Personal Data Protection Act No. 6698 or with your express consent may be disclosed to third parties, such as persons, institutions and companies, shareholders, suppliers, etc., with whom we cooperate in accordance with the provisions of Articles 8 and 9 of the Act, for the purposes and execution of the aforementioned activities.

Provided that appropriate measures are taken, your personal data relating to health may only be disclosed for the purposes of public health, preventive medicine, medical diagnosis, treatment and care, planning and management of health services and financing by persons or authorised institutions and organisations bound by confidentiality without obtaining the explicit consent of the data subject.

When expressly provided for by law, necessary to protect the life or physical integrity of the person who is unable to give consent due to actual impossibility or whose consent is not legally valid, directly related to the conclusion or performance of a contract, the processing of personal data of the parties to the contract is necessary, it is mandatory for the data controller, to comply with its legal obligation, the data has been made public, the processing is absolutely necessary for the establishment, exercise or protection of a right, provided that your fundamental rights and freedoms are not adversely affected, in cases where the processing is necessary for the purposes of the legitimate interests of the controller and also for the protection of public health, for the performance of preventive medical, medical diagnostic, treatment and nursing services; for the planning and management of health services and their financing, provided that it is carried out by persons bound to secrecy or by authorised institutions and organisations; your personal data may be transferred abroad without your express consent, provided that adequate protection exists abroad or, if adequate protection does not exist, provided that the data controllers in

Turkey and in the foreign country concerned undertake in writing to provide adequate protection and the data protection authority has given its approval.

The data protection authority shall decide whether adequate protection exists abroad and whether the transfer abroad is permissible by taking into account the international agreements to which Turkey is a party, the status of reciprocity between the country requesting the personal data and Turkey with regard to data transfer, the nature of the personal data, the purpose and duration of the processing, the relevant law and practice of the country to which the personal data are transferred, the measures taken by the controller in the country to which the personal data are transferred and, if necessary, the opinion of the competent institutions and organisations assessed. Without prejudice to the provisions of international agreements, your personal data may be transferred abroad only with the approval of the Board of Directors and after obtaining the opinion of the competent public body or organisation if Turkey or your interests would be seriously harmed.

In this context, your personal data will be transferred to the following entities for the following purposes;

1. To authorised public institutions and organisations
2. To the partners and responsible persons of the company,
3. To business and solution partners
4. To persons and companies that are suppliers,
5. To the real or legal persons with whom it interacts,
6. For the execution of emergency management processes
7. For the execution of information security processes
8. For the execution of activities in accordance with legislation
9. For the execution of financial and accounting matters
10. For the execution of corporate/product/service fidelity processes
11. For ensuring the physical security of the premises
12. For the follow-up and execution of legal matters
13. For the execution of communication activities
14. For carrying out sales processes for goods/services
15. For carrying out production and operational processes for goods and services
16. For the implementation of customer relationship management processes
17. For the implementation of customer, guest satisfaction and service quality activities
18. For the organisation and management of events
19. For the implementation of advertising/campaign/promotion processes
20. For the implementation of storage and archiving activities
21. For the execution of contract processes
22. For the follow-up of enquiries/complaints
23. For ensuring the security of data processing
24. For carrying out investment processes
25. For providing information to authorised persons, institutions and organisations
26. For the performance of management activities
27. For the creation, execution and monitoring of visitor data

5. Your rights as the owner of personal data

Under the law, the data subject has the following rights

- a) To know whether or not personal data have been processed,
- b) To be informed if personal data have been processed,
- c) To know the purposes for which personal data have been processed and whether they have been used for those purposes; and
- d) To know the third parties to whom personal data have been disclosed, whether at home or abroad; and
- e) request rectification of personal data in the event of incomplete or inaccurate processing,
- f) To request erasure or destruction of personal data under the conditions laid down in Article 7 of the Personal Data Protection Act No. 6698 (KVKK),
- g) To request that the third parties to whom they are communicated be informed of the personal data processed incorrectly and to be rectified, as well as of the personal data for which the destruction is requested
- h) To object to the analysis of the data processed solely by automated systems leading to a result detrimental to the data subject,
- i) In the event of damage caused by the unlawful processing of personal data, to seek compensation for the damage,

To exercise your right to complain as a personal data controller, you must first contact the personal data controller through the following communication channels. Without exhausting this channel, no complaint can be lodged with the data protection authority.

Your request will be answered by our company as data controller as soon as possible and at the latest within 30 days, depending on the nature of the request.

If your request is rejected or the response is deemed insufficient, or if your request is not answered within the deadline, you can make use of your right of appeal to the data protection authority or file a direct appeal.

Application address and contact details:

COMPANY TITLE	ADDRESS	E-MAIL	PHONE
RR TURİZM YATIRIMLARI ANONİM ŞİRKETİ	KISALAR MH. MERKEZ 56. SK KÜME EVLER CD. NO:103 MANAVGAT- ANTALYA	kvkk@liuresorts.com	+90 242 247 22 00

6. Retention period for your personal data

Your personal data that must be processed using the methods and for the purposes mentioned above will be stored for the period indicated in the data register, taking into account the limitation and expiry periods laid down by law. In the event that the reasons requiring the processing of your data cease to exist or the periods prescribed by law for the processing of your data have expired, they will be deleted, destroyed or made anonymous by our company ex officio at the latest after six months or at the latest after thirty days at your request, using one of the destruction methods.

The deletion of your personal data consists in making them inaccessible to the users concerned and in making them in no way reusable.

Destruction of your personal data is the process of making the personal data inaccessible, irretrievable and unusable by anyone.

Anonymisation of your personal data is the process by which the data can no longer be associated with an identified or identifiable natural person, even through the use of appropriate techniques.

The processes of deletion, destruction and anonymisation of your personal data are logged. In view of public requirements, these logs will be kept for 5 years.

Kindly submitted to your information.

7. Identity of the data controller

COMPANY TITLE	ADDRESS	TAX OFFICE AND NUMBER	CENTRAGL REGISTRATION SYSTEM NUMBER
RR TURİZM YATIRIMLARI ANONİM ŞİRKETİ	KISALAR MH. MERKEZ 56. SK KÜME EVLER CD. NO:103 MANAVGAT-ANTALYA	ANTALYA KURUMLAR VD. 7351597677	0735159767700001