

**OUR COMPANY POLICY REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA PURSUANT TO THE LAW NO 6698,  
INFORMATION AND CONSENT FORM RELATED TO THE PERSONAL DATA PROTECTION LAW NO 6698 AND YOUR RIGHTS UNDER THIS  
LAW**

**DEMİRLER EĞİTİM SANAYİ VE TİCARET ANONİM ŞİRKETİ** places utmost importance to protecting the security and confidentiality of the personal data you have provided while using our website, while receiving our services or by other means. So far we have always kept our customers' data confidential and never shared it with third persons, except for legal obligations. This document ("Policy") has been issued in order to provide information, as required by laws, to the real persons whose personal data is processed by the data controller in our company. Also, the cookies policy of [www.albahotels.com.tr](http://www.albahotels.com.tr) is an integral part of this Policy. The "Personal Data Protection Law" no 6698 ("PDPL") has been put into effect recently. As a data controller, we would like to provide information to you within the framework of the PDPL about the said legislation, about some definitions and subjects stated in this legislation and about **our company's legal rights and obligations**:

**I- Pursuant to the Personal Data Protection Law ("PDPL") no 6698;**

**Personal data:** All kinds of information belonging to a real person with a definite or determinable identity,

**Processing of personal data:** All kinds of processing of the personal data, including acquiring such data by entirely or partly automatic means or non-automatic means belonging to some data registering system, as well as recording, storing, maintaining, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or blocking it from use,

**Data processor:** Real or legal person processing personal data on behalf of and based on the authorisation granted by the data controller,

**Data registration system:** The registration system in which personal data is structured and entered according to certain criteria,

**Data controller:** The real or legal person who specifies the purposes and means for processing personal data and is responsible for establishing and arranging the data registration system. Within the framework of laws, our company **DEMİRLER EĞİTİM SANAYİ VE TİCARET ANONİM ŞİRKETİ** ([www.albahotels.com.tr](http://www.albahotels.com.tr)) acts as the data controller.

**II- Collecting and Processing Personal Data and the Purposes of such Processing:**

**II.1. General Principles related to the Processing of Personal Data;**

Pursuant to the 4<sup>th</sup> article of the Law, personal data must be processed according to the methods and principles stipulated in the legislation. In that scope, data controllers are responsible for acting in conformance with the general principles of personal data processing listed below during the processing of personal data, except for the cases of fulfilling the clarification obligation mentioned above:

1-Observing the laws and the rules of integrity

2-Being correct and updated when necessary

3-Processing for specific, clear and legitimate purposes

4-Being limited, restraint and relevant to the purpose of processing,

5-Being maintained for the period of time as stipulated in the related legislation or for as long as necessary for the purpose of processing

**II.2. Purposes of processing personal data:**

According to the principles of law, personal data may not be processed unless expressly consented by the data owner. On the other hand, some circumstances have been specified in the 5<sup>th</sup> and 6<sup>th</sup> articles of the Law in which personal data and special personal data may be processed without the requirement of an express consent. Pursuant to article 5, personal data may be processed even in the absence of prior express consent of the data owner (provided the necessary information is given beforehand) if,

• *Data processing is clearly stipulated by the laws,*

• *Data processing is mandatory in order to protect the life or the physical integrity of the person him/herself, or another person, who is unable to give consent due to actual impossibility or whose consent is not recognised to be legally valid,*

• *Data processing is needed for the parties to an agreement, provided that the processing is directly related to the execution or fulfilment of the agreement,*

• *Data processing is mandatory for the data controller to fulfil its legal obligations,*

• *Personal data is publicised by the related person himself/herself,*

• *Data processing is mandatory to establish, exercise or protect a certain right,*

• *Data processing is mandatory for the legitimate interests of the data controller, provided the basic rights and liberties of the related person is kept free from harm.*

*On the other hand, data about the person's race, ethnicity, political view, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, health, sexual life, convictions and security measures as well as biometric and genetic data are defined by the Law as "special" or "sensitive" personal data and stricter conditions have been stipulated for the processing of such data. Accordingly, special personal data may only be processed in the following circumstances in the absence of prior express consent of the data owner:*

• *Data about the person's race, ethnicity, political view, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, convictions and security measures as well as biometric and genetic data can be processed under legally stipulated circumstances.*

• *Personal data about health and sexual life may only be processed by persons under the obligation of confidentiality or by authorized institutions and organizations for the purposes of protecting public health, preventive medicine, providing medical diagnosis, treatment and care services, planning and managing health services and financing.*

**II.3. Purposes of Disclosing Personal Data:**

In conformance with data processing, disclosure of personal data to third persons (transfer) is also subject to the express consent given by the related data owner. However, since the conditions under which data processing is allowed are also suitable for data transfer pursuant to article 8 of the Law, the presence of the above mentioned conditions shall make it possible to transfer personal data or special personal data even in the absence of express consent of the data owner. Disclosure of personal data to third persons located outside the country are governed by special provisions of the Law.

Accordingly, personal data may be transferred outside the country if;

• Data owner has given express consent,

• One or more of the other requirements listed above are met where express consent of the data owner is not available;

provided that the country to which such data are transferred has sufficient protective measures and, if the country to which such data are transferred does not have sufficient protective measures, that the data controller has made written commitment to provide sufficient protection together with the data controller in the related foreign country and that permission has been obtained from the Personal Data Protection Council.

#### **Circumstances not Covered by the Law**

**The law shall not be Applicable in the following circumstances pursuant to article 28 of the Law:**

- *Processing of personal data by real persons within the scope of activities related entirely to the person or to the family members living in the same dwelling with the person, on condition of non-disclosure to third persons and observance of the data confidentiality obligations.*
- *Processing of personal data for purposes of research, planning and statistics by being unanimously included in official statistics.*
- *Processing of personal data for artistic, historical, literal or scientific purposes or for purposes of the freedom of expression, on condition that national defence, national security, public security, public order, economic security, right of privacy or personal rights are not violated and no crime is committed.*
  - *Processing of personal data within the scope of preventive, protective and informative activities executed by public institutions and organizations delegated and authorised by the laws in order to ensure national defence, national security, public security, public order or economic security.*
  - *Processing of personal data by judicial authorities or executive offices in association with investigation, prosecuted, judgement or execution procedures.*

#### **II.4. Processing of personal data by our company:**

Your personal and/or special personal data may be acquired by our Company, as the data controller, or via our official website by way of entirely or partly automatic or non-automatic means as long as you make use of the products and services offered by our Company, and recorded, stored, modified, updated, periodically checked, reorganized, classified, maintained as long as necessary for the purpose of processing or as stipulated by the related law and may be disclosed in case of legal or service-related actual requirements to the agencies and banks that our Company is working with, to companies mediating for or collecting the payments, to the public institutions and organizations against which the Company has legal obligations and/or to the third person real/legal persons, service providers and insurers residing in Turkey or abroad. The personal data may be transferred abroad in case of legal or service-related requirements and/or processed including the blocking of use. Your personal data may be collected in all written, oral or electronic environments through all kinds of channels, including but not limited to our company / our website / our call center.

#### **III- The method and the legal reason of collection personal data:**

Our Company provides information to data owners pursuant to article 10 of the Law before having them provide their personal data. In case any data processing procedure implemented by our Company does not meet the requirements stipulated in the Laws and detailed above, express consent of the data owner is obtained and the related data processing continues within the scope of the said express consent. In legal terms, express consent means, "the consent given with free will for a certain subject, based on the information received" and accordingly our Company provides information to the data owners pursuant to article 10 of the Law and then obtains their express consent.

Your personal data is collected in all types of oral, written or electronic environments, in line with the above mentioned purposes, for the Company to provide its products and services in the predefined legal framework, to fulfil its contractual and legal obligations completely and correctly and to provide you a better service. Once collected for this legal reason, your personal data may be processed and transferred also for the purposes explained in paragraph (b) above within the framework of personal data processing conditions and purposes stipulated in articles 5 and 6 of the PDPL no 6698.

Although a certain period is not specified in the Law for the retention of personal data, such data shall only be maintained for the purposes stated in this document, in our website and/or in the reservation or sales contract included in our website and/or for the period of time stipulated in the provisions of the applicable laws. Our Company deletes or destroys the personal data in line with the Law at the end of 5 years, the given period and/or when the purpose of processing such personal data within the scope of a certain procedure has been removed.

#### **IV- Our Personal Data Owner customers have the following rights as listed in article 11 of the PDPL:**

Our customer have the right apply to our company pursuant to article 11 of the Law no 6698 in order to;

- 1-Learn whether the personal data has been processed or not,
  - 2-Request related information if the personal data has been processed,
  - 3-Know about the purpose of processing the personal data and whether the data has been used for the intended purpose,
  - 4-Know about the third persons within or outside the country to whom the personal data has been transferred,
  - 5-Ask for the correction of any incomplete or incorrect processing of the personal data,
  - 6-Ask for the deletion or destruction of the personal data within the framework of the conditions stipulated in article 7 of the Law,
  - 8-Ask for instructions to be sent to third persons to whom the personal data has been transferred concerning the actions taken pursuant to items 5 and 6 above,
- Raise objection to any results occurring against the person him/herself when the processed data is analysed only by means of automatic systems,
- 9-Ask for the compensation of any damage that the person might have incurred because of the illegal processing of personal data.

As our personal data owner customers, you may prepare a written request including your claims for the above mentioned rights along with the necessary information to prove your identity and the description of the rights you wish to exercise, and send it either with wet signature to the address of "Alba Ankara Hotel Yüksel Caddesi No:19 Kızılay/Ankara" or with secure electronic signature to our registered electronic mail address [info@albaankara.com.tr](mailto:info@albaankara.com.tr). The application that you make for exercising the above mentioned rights you have as the owner of personal data and that also includes your description of the rights you wish to exercise must contain a clear-cut statement of your request; the subject of request must be related to your personality or, if you are acting on behalf of another person, you must be especially authorized to do so and must document your authorization; the application must include details of identity and address and be accompanied by documents proving your identity. Duly submitted applications shall be finalized as soon as possible and within 30 days at the latest. These applications are currently free-of-charge. However, if any costs are incurred during the processing, the tariff defined by the Personal Data Protection Council may apply.

**V. Updates and the correctness of personal data:**

Personal data owners and/or users have accepted and declared their awareness of the fact that it is important for all the information shared with our website to be correct and updated and to be maintained in an updated form so that the rights over the personal data they have been granted by the PDPL can be exercised and the other related legislation can be applicable and that they have/shall have the sole responsibility for the consequences of providing incorrect information for any reason whatsoever. Any modifications and/or updates of the personal data you have shared with our company can be sent with wet signature to the address of “Alba Ankara Hotel Yüksel Caddesi No:19 Kızılay/Ankara” or to the e-mail address [info@albaankara.com.tr](mailto:info@albaankara.com.tr). Our company reserves the right to make unannounced changes in the website and the above given e-mail/application addresses. Personal Data owner and/or users have irrevocably accepted, declared and undertaken that they have read the above written Personal Data Protection Policy before entering our website, that they will observe all considerations stated above, and that all content in our website and all electronic environment and computerised records of our Company shall be considered final evidence pursuant to article 193 of the Code of Civil Procedure.

**VI- Personal Data Security**

Our Company has been doing the legal inspections and taking the minimum reasonable technical, software and hardware measures in line with the processed personal data in order to prevent the risks of unauthorized access, accidental data losses, intentional deletion or destruction of data for ensuring the security of personal data.

- Our facilities are equipped with closed circuit camera and recording system and the closed circuit camera (CCTV) recordings are being used to ensure security of the people working in and the people paying visits to our facilities and the other premises and to give support to the judicial authorities in shedding light on judicial issues and preventing, solving, investigating and prosecuting any criminal acts. These recordings may also be used for establishing, implementing and defending the legal rights of our company.
- Please make an express statement of it if you do not want any part of your personal data, including the ones written on the registration card, to be saved, processed, recorded, transferred and shared for the above mentioned purposes.
- Dear customer, please thoroughly read the informative text above for gaining knowledge about the rights and authorisations you have on your personal data within the scope of the Personal Data Protection Law no 6698 and, once you have understood the text and are willing to give express consent to your personal data being processed, stored and transferred as described above, confirm your consent by signing in the box below with the wording “Yes – I accept”.

**TEXT OF CONSENT FOR THE PROCESSING, STORAGE AND TRANSFER OF YOUR PERSONAL DATA**

• Within the framework of the above clarifications; I accept that I have read and understood the informative text written above either face to face or by way of using one of the means including short message, electronic mail, internet, website, disk, cd, dvd, memory card or similar, pursuant to paragraph (c) in article 4 of the Distant Contract Regulation and that the statement I have given below through these means is valid. Pursuant to the Personal Data Protection Law no 6698 and having been duly informed about the matter by this text consisting of 6 articles, with no room for doubt, I declare that all of the information given in the registration card is true and correct and I give express consent to your Company for acquiring part or all of my personal and/or special personal data through any means including but not restricted to your call center, websites and social media accounts based on the principles stipulated by the laws or the above text, for recording, storing, modifying, updating, periodically checking, reorganizing, classifying, processing and retaining it as long as necessary for the purpose of processing or for the period of time stipulated by the related law, disclosing it in case of legal or service-related actual requirements to the public institutions and organizations the Company is working with or against which the Company has legal obligations and/or to the agencies, banks, third person service providers residing in Turkey or abroad and to the Company, processing it for legal or service-related actual requirements including transferring it abroad or blocking it from use;

	Name Surname	Yes-I Accept	No-I do not Accept
Guest			
Accompanying Guest 1			
Accompanying Guest 1			
Accompanying Guest 1			
Accompanying Guest 1			

Date: ...../...../.....