

ISTANBUL KERVANSARAY HOTEL AND TOURISM INC. PERSONAL DATA STORAGE AND DISPOSAL POLICY

1. INTRODUCTION

1.1 Objective

The objective of this policy is to set forth the principles and procedures regarding the processing and protection of personal data as well as the deletion, disposal and anonymization of such processed personal data by ISTANBUL KERVANSARAY HOTEL VE TURİZM A.Ş (ERV KERVANSARAY HOTEL "); according to the Law No. 6698 on the Protection of Personal Data (Law) published in the Official Gazette No. 30224 on 28.10.2017, the Regulation on the Deletion, Destruction or Anonymous Making of Personal Data (Regulation).

1.2 Scope

This policy , as specified in the Law or any data fully or partially automatic registration system located in the non-automated system for processing data path, provided that the part includes personal data. Unless otherwise specified in the policy, personal data and personally identifiable personal data will be collectively referred to as "Personal Data".

1.3 Abbreviations and Definitions

Open Consent: Consent based on information about a specific subject and declared with free will.

Anonymous Rendering: Making personal data unmatched to any identifiable or identifiable natural person, even by pairing it with other data.

EDMS: Electronic Document Management System Electronic

Media: Environments where personal data can be created, read, modified and written with electronic devices.

Non-Electronic Environment: All electronic, printed, printed, visual, and so on. other environments.

Related Person: KERVANSARAY HOTEL , whose personal data is processed , refers to its employees, business partners, customers and third parties.

Relevant User: Persons who process personal data within the organization of the data officer or with the authority and instruction received from the data officer, except the person or unit responsible for the technical storage, protection and backup of the data.

Destruction: Deletion, destruction or anonymization of personal data.

Law: Law No. 6698 on the Protection of Personal Data.

Recording Media: Any media containing personal data that is either fully or partially automated or processed by non-automated means provided that it is part of any data recording system.

Personal Data: Any information relating to an identifiable or identifiable natural person.

Personal Data Processing Inventory: The data processing activities of the data responsible according to the business processes; the inventory that they form by linking the personal data with the purposes of data processing, the data category, the group of recipients transferred, and the group of data subject, and detailing the maximum time required for the purposes for which the personal data were processed, the personal data envisaged to be transferred to foreign countries, and the measures taken for data security.

Processing of Personal Data : Any operation, which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system.

Board: The Personal Data Protection Board.

Personal Data: Biometric data about the race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures. and genetic data.

Periodic Disposal: The deletion, disposal or anonymization, which shall be conducted automatically on a periodical and recurrent basis as specified within the personal data storage and disposal policy in the cases, where all of the requirements for the processing of personal data as set forth within the Code cease to be satisfied.

Policy: Storing and Disposing of Personal Data

Data Processor: Refers to KERVANSARAY HOTEL, which processes personal data .

Data Recording System: A recording system in which personal data is structured and processed according to certain criteria.

Data Responsible: A natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system. (KERVANSARAY HOTEL MANAGEMENT)

Data Officers Registry Information System: An information system created by the Presidency and managed by the Presidency, which will be used by the data responsible for the application to the Registry and other related transactions.

VERBIS: Data Responsible Registry Information System

Regulation: Regulation on the Deletion, Destruction or Anonymous Making of Personal Data published in the Official Gazette dated October 28, 2017 .

2. COMMITMENTS AND DECLARATIONS

Unless exempted by exception, KERVANSARAY HOTEL is a data officer responsible for registration. It accepts, declares and undertakes that it is obliged to prepare a Policy and to act in accordance with this Policy in order to store the personal data it holds in accordance with the Law and regulations and to delete, destroy or anonymize it when necessary.

The following principles apply to the storage and disposal of personal data:

- a) KERVANSARAY HOTEL, in accordance with article 4 of the Law : It accepts, declares and undertakes that it shall comply with the principles of uyun compliance with the law and honesty rules, being accurate and up-to-date when necessary, processing personal data for certain, clear and legitimate purposes, processing personal data in a limited and measured manner, and preserving it for as long as necessary ”.
- b) KERVANSARAY HOTEL accepts that the preparation of this Policy does not imply that personal data are deleted, destroyed or anonymized in accordance with the legislation.
- c) When storing, deleting, destroying or anonymizing personal data, KERVANSARAY HOTEL shall comply with the security measures stated in Article 12 of the Law, the provisions of the relevant legislation , particularly the Regulation, and the decisions to be taken by the Personal Data Protection Board and the Policy. accept, declare and undertake that it will act appropriately.
- d) KERVANSARAY HOTEL shall ensure compliance with the tools, programs and processes to be applied in accordance with this Policy and the Policy during the deletion, destruction or anonymization of the personal data which are fully or partially automated or processed by non-automatic means provided that it is part of any registration system undertakes.

3. RECORDING MEDIA

KERVANSARAY HOTEL agrees to include in the scope of this Policy the personal data in the following environments which contain personal data and in addition to the other media that may arise.

- a) Computers and servers registered on behalf of KERVANSARAY HOTEL
- b) Network devices
- c) Shared / non-shared disk drives used for storing data on the network

- d) Cloud systems
- e) Mobile phones and all storage areas
- f) Paper
- g) Microfiche
- h) Peripherals such as printer, fingerprint reader
- i) Magnetic tapes
- j) Optical discs
- k) Flash memories

4. CONDITIONS REQUIRING STORAGE AND DISPOSAL OF PERSONAL DATA

KERVANSARAY HOTEL stores personal data with the express consent of the person concerned or without the express consent of the person concerned in the cases written in the Law, without prejudice to the storage periods stipulated in the legislation, in accordance with the principles specified in the Law for the period required for the purpose of processing the data.

As a rule, private personal data cannot be stored or processed in any other way without the express consent of the person concerned, but they are processed in the cases and processes specified in the Law .

In cases where we process personal data for more than one purpose, the data is deleted, destroyed or anonymized and stored at the request of the person concerned (in case there is no obstacle in the legislation). In terms of destruction, deletion or anonymization, the provisions of the legislation and decisions of the Board of the KVK shall be complied with.

5. CIRCUMSTANCES REQUIRING DISPOSAL OF PERSONAL DATA

KERVANSARAY HOTEL will initiate the necessary actions in case of a violation as stated below. KERVANSARAY HOTEL takes all kinds of technical and administrative measures for safe storage of personal data and preventing unlawful processing and access. The reasons for the destruction of personal data are as follows:

5.1. Unlawfulness

KERVANSARAY HOTEL undertakes that it will not store and / or process any personal data in contradiction with the manner specified in the Law, and will destroy the data that is illegal to store in accordance with the changing legislation, in accordance with the Law, Regulation, KVKK decisions and the provisions of this Policy.

5.2. Elimination of Data Processing Terms

KERVANSARAY HOTEL is responsible for the up-to-date data processing conditions and shares this responsibility with its employees. Employees cannot continue to process data if the data processing requirements are removed. KERVANSARAY HOTEL, as mentioned in the Regulation accepts the disappearance of cases, data processing conditions listed below:

- a) Amendment or repeal of the provisions of the relevant legislation which constitute the basis for processing personal data,
- b) The contract between the parties has never been established, the contract is invalid, the contract is terminated automatically, the contract is terminated or returned from the contract ,
- c) Eliminating the purpose of processing personal data,
- d) The processing of personal data is against the law or the code of honesty,
- e) In case the processing of personal data occurs only with the express consent of the person concerned, the person concerned revokes his consent,
- f) Acceptance of the application made by the person concerned to the data officer upon request of deletion or destruction of personal data following the elimination of situations requiring data processing activity,
- g) Data charge of the , by the request for deletion or destruction of personal data by the person to reject the application made to it, his answer was found lacking or in case of non-response within the time limit specified in the Law; Complaining to the Board and approval of this request by the Board,
- h) Although there has been a maximum period of time for the storage of personal data, there is no requirement to justify the storage of personal data for a longer period of time.

6. DISPOSAL OF PERSONAL DATA

The destruction of personal data can be achieved in three different ways. These are deletion, destruction or anonymization of data.

6.1 Deleting Personal Data

Deletion of personal data is the process of making personal data inaccessible and inaccessible to the users concerned. Although KERVANSARAY HOTEL has been processed in accordance with the provisions of the relevant law, in case the reasons that require processing are eliminated and the conditions set out in the Regulation arise, it deletes or destroys personal data according to its decision or upon the request of the personal data holder.

6.2 Destruction of Personal Data

Destruction of personal data is the process by which personal data cannot be accessed, retrieved or reused by anyone in any way.

Destruction will be carried out in cases where KERVANSARAY HOTEL processes data in physical recording environments. By destroying, this data is rendered impossible to recover. During this process, KERVANSARAY HOTEL employees and related departments are obliged to inform the KVKK Working Group about the data to be destroyed, and then KERVANSARAY HOTEL shall take all necessary technical and administrative measures.

6.3 Anonymization of Personal Data

The anonymisation process is where KERVANSARAY HOTEL processes personal data completely or automatically, making it unrelated to a certain or identifiable natural person even if it is matched with other data.

7. MEASURES FOR THE STORAGE AND DISPOSAL OF PERSONAL DATA

7.1 Technical Measures Concerning the Storage of Personal Data

Security systems are established in accordance with technological developments regarding the storage of personal data. Only authorized employees have access to personal data. Personal data, which cannot be accessed even by authorized employees, is protected by key and password methods. KERVANSARAY HOTEL, storing the data from the 3rd person work demands commitments regarding the fulfilment of certain standards. However, KERVANSARAY HOTEL takes the necessary precautions to ensure that personal data is not lost and used illegally.

7.2 Administrative Measures Concerning the Storage of Personal Data

Additional technical data and create awareness about the preservation of administrative inform our employees about risks la together, the people of personal data is transferred, the necessary security measures to protect personal data transferred to and stored in a secure we take.

8. MEASURES RELATED TO DISPOSAL OF PERSONAL DATA

8.1 Technical Precautions Regarding the Destruction of Personal Data

The unit responsible for data processing and destruction determines the personal data that will be the subject of the deletion process and identifies the relevant users for each personal data. Authorities and methods of access, retrieval, re-use of personal users within the scope of personal data are closed and eliminated.

Data on cloud systems and central server are deleted by giving delete command. Database corresponding line of data in the database command l bees (Delete) and delete. All these operations are removed if the user is authorized to retrieve the deleted data. For erasing data stored in other recording media (blackout etc.) and disposal (no physical not, to de-magnetize

overwriting) one or anonymization methods are preferred. All relevant media for the disposal method to be selected are determined and the type of system where the data is located is considered.

8.2 Administrative Measures Concerning Destruction of Personal Data

Employees are informed about the protection and destruction of personal data within the legislation. In the workplace, especially necessary equipment for physical destruction is kept.

9. DISPOSAL METHODS AND PROCESS OF PERSONAL DATA

Destruction of personal data takes place in the following ways:

9.1 Delete Command

The data in the cloud system and databases is deleted by giving a delete command. It is noted that the said user is not authorized to retrieve deleted data on the cloud system or database while performing said operation. All copies of the encryption keys of personal data are also destroyed. Help is available from the cloud administrator if necessary.

9.2 Anonymization Methods

In the case of anonymization, the nature of the data, the size, the diversity, the nature of the presence in the physical environment, the frequency of processing, the reliability of the party to be transferred, the effort to make the data anonymous, and so on. the appropriate method is selected and anonymization is applied.

9.3 Overwriting

It is the process of making old data unreadable by writing random data consisting of 0 and 1 at least 8 times with software on magnetic media and rewritable optical media.

9.4 Magnetizing

It is the process of placing the magnetic media in a high value magnetic field in order to make the data on it unreadable.

9.5 Physical Destruction

It is the process of physically destroying optical or magnetic media by melting, pulverizing, grinding and the like. It can be applied in cases where magnetization or overwriting methods fail. Paper personal data on the media in the necessary paper will be destroyed with the destruction or crop machinery.

Printer, door entry tourniquet, network devices, mobile phones and so on. for the destruction of personal data contained in such environments. Such disposal must be carried out before the devices are subjected to backup, maintenance and similar operations.

10. STORAGE AND DISPOSAL TIMES

10. 1 Periodical Destruction and Legal Retention Times

Physical and digital data that expires the legal retention periods are periodically destroyed within the intervals stipulated by the legislation. Periodic destruction takes place at 6-month intervals for all personal data. Records of such transactions relating to deleted, destroyed and anonymized data shall be retained for at least 3 years free of other legal obligations.

10.2 Deletion and Elimination Process if Data Holders Request

Data holders KERVANSARAY HOTEL where requested the deletion of personal data belonging to itself by application or destruction KERVANSARAY HOTEL, checks the current status of the personal data processing conditions and is hence related actions. Deletes, destroys or anonymized the personal data subject to the request if all of the personal data processing requirements have been removed. KERVANSARAY HOTEL shall conclude the request of the person concerned within thirty days at the latest and inform the person concerned. KERVANSARAY HOTEL informs the third party if all of the personal data processing conditions have been removed and the personal data subject to the request has been transferred to third parties; ensures that the necessary actions are taken by the third party within the scope of the Regulation. If the disappearance of all personal data processing conditions, KERVANSARAY HOSPITALITY concerned may reject the request by explaining the rationale for rejection of data and notifies the appropriate person to answer later in writing or in electronic form within thirty days.

11. EFFECTIVE DATE OF POLICY AND UPDATES TO BE MADE IN POLICY

1. An update can be made to the Policy following the amendment to be made in the relevant legislation.
2. KERVANSARAY HOTEL will share its changes with the employees via e-mail in order to review the changes made to the Policy and make them available to the employees via corporate internet. This Policy entered into force as of ... / ... / ... date.