

CORPORATE GENERAL DISCLOSURE STATEMENT

REGARDING THE PROCESSING OF PERSONAL DATA

As Haseki Tourism Health Construction Industry and Foreign Trade Ltd. Co. (“Hürrem Sultan Hammam”), we have prepared this disclosure statement in order to inform our Visitors, Online Visitors, Customers, Potential Customers, Supplier Employees, and Supplier Representatives regarding the processing, storage, and transfer of your personal data within the scope of the activities arising from the Turkish Personal Data Protection Law No. 6698 (“KVKK”), the GDPR, and related legislation and legal regulations.

1) What Categories of Personal Data Do We Process and For What Purposes?

Your personal data may be processed by Hürrem Sultan Hammam in accordance with the principles set forth under Article 4.2 of the KVKK and Article 5 of the GDPR, namely:

1. Being lawful and fair,
2. Being accurate and up to date where necessary,
3. Being processed for specified, explicit, and legitimate purposes,
4. Being relevant, limited, and proportionate to the purposes for which they are processed,
5. Being retained for the period stipulated by the relevant legislation or required for the purpose for which they are processed.

Within the scope of our ongoing business relationships with our business partners (a person may fall into more than one category), your personal data may be processed for the purposes stated below.

A. Our Visitors

The identity information of our visitors (e.g., name, surname) and physical space security information (e.g., camera recordings) shall be processed for the following purposes:

- a) Creating and tracking visitor records,
- b) Ensuring physical space security.

Such personal data are processed pursuant to Article 6/1(f) of the GDPR based on the legitimate interests of the data controller regarding ensuring the security of physical premises and controlling visitor entries and exits. These processing activities are carried out in a manner that does not harm the fundamental rights and freedoms of the relevant persons.

B. Our Online Visitors

For online visitors using our website, transaction security information (IP address information), marketing information (cookie records), identity information (name, surname), and contact information (e-mail address and phone number) may be processed for the following purposes:

- a) Carrying out activities in compliance with legislation,
- b) Conducting information security processes,
- c) Tracking requests/complaints,
- d) Conducting communication activities,
- e) Providing information to authorized persons, institutions, and organizations,
- f) Sending commercial electronic messages and newsletters to inform you about our campaigns and promotions,
- g) Enabling your access to our website via the internet.

The aforementioned personal data are processed:

- Pursuant to Article 6/1(f) of the GDPR based on the legitimate interests of the data controller for the purposes specified in items (a), (b), (c), (d), (e), and (g),
- Pursuant to Article 6/1(b) of the GDPR for the performance of a contract,
- Pursuant to Article 6/1(c) of the GDPR for compliance with our legal obligations.

Your personal data relating to promotional activities and newsletter delivery under item (f) are processed based on the explicit consent of the data subject pursuant to Article 6/1(a) of the GDPR. If you do not provide consent, promotional messages and newsletters will not be sent to you. Furthermore, if you withdraw your consent, your personal data will no longer be processed for these purposes.

C. Our Customers

The identity information (name, surname), contact information (phone number, e-mail address), customer transaction information (order information), physical space security information, financial information (IBAN information), legal transaction information, and marketing information (shopping history) of our real person customers or the representatives and/or employees of our corporate customers may be processed for the following purposes:

- a) Carrying out activities in compliance with legislation,
- b) Conducting finance and accounting activities,
- c) Conducting/supervising business activities,

- d) Conducting logistics activities,
- e) Conducting after-sales support services for goods/services,
- f) Conducting goods/service sales processes,
- g) Conducting marketing analysis studies,
- h) Conducting contract processes,
- i) Providing information to authorized persons, institutions, and organizations,
- j) Ensuring physical space security,
- k) Resolving legal disputes,
- l) Conducting storage and archiving activities,
- m) Conducting risk management processes,
- n) Sending commercial electronic messages and newsletters for advertising/campaign/promotion activities,
- o) Conducting loyalty processes regarding company/products/services,
- p) Conducting communication activities.

D. Our Potential Customers

The identity information (name, surname), contact information (phone number, e-mail address), customer transaction information (shopping cart information), physical space security information, and marketing information (cookie records) of our real person potential customers or the representatives and/or employees of our corporate potential customers may be processed for the following purposes:

- a) Managing goods/service sales processes,
- b) Conducting contract processes,
- c) Ensuring physical space security,
- d) Conducting advertising/campaign/promotion processes and sending commercial electronic messages and newsletters.

Such personal data are processed:

- Pursuant to Article 6/1(b) of the GDPR for the purposes specified in items (a) and (b), within the scope of the establishment or performance of a contract,
- Pursuant to Article 6/1(f) of the GDPR for the purpose specified in item (c), based on the legitimate interests of the data controller,
- Pursuant to Article 6/1(a) of the GDPR for the marketing and commercial electronic communication activities specified in item (d), based on the explicit consent of the relevant person.

E. Our Supplier Employees

The identity information (name, surname), contact information (phone number, e-mail address), physical space security information, professional experience information (professional qualification information), personnel information (employment entry declaration), vehicle plate information, and financial information (IBAN number) of our supplier employees may be processed for the following purposes:

- a) Conducting communication activities,
- b) Conducting/supervising business activities,
- c) Ensuring physical space security,
- d) Conducting supply chain management processes,
- e) Conducting logistics activities,
- f) Carrying out activities in compliance with legislation,
- g) Conducting occupational health and safety activities.

Such personal data are processed:

- Pursuant to Articles 6/1(b) and 6/1(f) of the GDPR for the purposes specified in items (a), (b), (d), and (e), within the scope of the establishment or performance of a contract and the legitimate interests of the data controller,
- Pursuant to Article 6/1(f) of the GDPR for the purpose specified in item (c), based on the legitimate interests of the data controller in ensuring physical space security,
- Pursuant to Article 6/1(c) of the GDPR for the purposes specified in items (f) and (g), within the scope of fulfilling the legal obligations to which the data controller is subject.

F. Our Supplier Representatives

The identity information (name, surname), contact information (phone number, e-mail address), physical space security information, professional experience information (professional qualification information), personnel information (employment entry declaration), vehicle plate information, and financial information (IBAN number) of our real person suppliers or corporate supplier representatives may be processed for the following purposes:

- a) Conducting/supervising business activities,
- b) Conducting goods/service procurement processes,
- c) Conducting finance and accounting activities,
- d) Conducting contract processes,
- e) Conducting investment processes,

- f) Ensuring physical space security,
- g) Following up and conducting legal affairs.

Such personal data are processed:

- Pursuant to Articles 6/1(b) and 6/1(f) of the GDPR for the purposes specified in items (a), (b), (c), (d), and (e), within the scope of the establishment or performance of a contract and the legitimate interests of the data controller,
- Pursuant to Article 6/1(f) of the GDPR for the purpose specified in item (f), based on the legitimate interests of the data controller in ensuring physical space security,
- Pursuant to Articles 6/1(c) and 6/1(f) of the GDPR for the purpose specified in item (g), within the scope of fulfilling the legal obligations of the data controller and establishing, exercising, or protecting legal rights.

2) What Are the Methods of Collecting Your Personal Data?

Your personal data listed above in categories are collected through physical means such as order forms, contracts, and visitor forms, as well as through information systems and electronic devices (e.g., telecommunications infrastructure, computers, and telephones), third parties (e.g., agencies), our website, and other documents declared by the relevant person, either through automated or non-automated methods.

3) What Is the Legal Basis for Collecting Your Personal Data?

Your personal data are processed by us in accordance with Article 5 of the KVKK and Article 6 of the GDPR for the realization of the purposes explained above, based on the following legal grounds:

- i) Explicitly stipulated by law,
- ii) Being directly related to the establishment or performance of a contract, provided that processing personal data belonging to the parties of the contract is necessary,
- iii) Being necessary for the data controller to fulfill its legal obligations,
- iv) Being necessary for the establishment, exercise, or protection of a right,
- v) Being necessary for the legitimate interests of the data controller, provided that such processing does not harm the fundamental rights and freedoms of the relevant person.

Additionally:

vi) The identity and contact data of our online visitors, customers, and potential customers are processed based on their explicit consent for the purposes of sending commercial electronic messages and newsletters for advertising, campaign, and promotional activities. If you do not provide consent, commercial communications will not be sent to you, and if you withdraw your consent, your data will no longer be used for these purposes.

5) Do We Transfer Your Personal Data to Third Parties?

a) Personal data belonging to our visitors may be shared with law enforcement authorities and judicial authorities for the resolution of legal disputes and when requested pursuant to relevant legislation.

b) Personal data belonging to our online visitors may be shared with judicial authorities and authorized public institutions and organizations for the resolution of legal disputes and when requested pursuant to relevant legislation.

c) Personal data belonging to our customers may be transferred:

- To authorized public institutions and organizations for carrying out activities in compliance with legislation, following and conducting legal affairs, and providing information to authorized persons, institutions, and organizations within the scope stipulated by legal regulations,
- To our group companies, IT companies, suppliers, cargo companies, insurance companies, banks, and financial advisors to the extent necessary for conducting/supervising business activities, conducting risk management processes, and properly performing our services,
- To the law firms from which we receive services and judicial authorities for use as evidence in possible future legal disputes.

d) Personal data belonging to our potential customers may be transferred to the law firms from which we receive services and judicial authorities for use as evidence in possible future legal disputes.

e) Personal data belonging to our supplier employees may be transferred:

- To authorized public institutions and organizations for carrying out activities in compliance with legislation, following and conducting legal affairs, providing information to authorized persons, institutions, and organizations, and conducting/supervising business activities within the scope stipulated by legal regulations,

- To group companies, IT companies, suppliers, cargo companies, banks, and financial advisors to the extent necessary for the proper performance of services,
- To the law firms from which we receive services and judicial authorities for use as evidence in possible future legal disputes.

f) Personal data belonging to our supplier representatives may be transferred:

- To authorized public institutions and organizations for carrying out activities in compliance with legislation, following and conducting legal affairs, providing information to authorized persons, institutions, and organizations, and conducting/supervising business activities within the scope stipulated by legal regulations,
- To group companies, IT companies, suppliers, cargo companies, banks, and financial advisors to the extent necessary for the proper performance of services,
- To the law firms from which we receive services and judicial authorities for use as evidence in possible future legal disputes.

6) Retention Period of Your Personal Data

The aforementioned personal data shall be retained for the period stipulated in the relevant legislation, if such a period is prescribed. If no retention period is prescribed, the data shall be retained for as long as our legitimate interests continue, taking into consideration the following criteria:

- Hürrem Sultan Hammam practices,
- Applicable commercial customs,
- Limitation periods prescribed under relevant legislation.

At the end of these periods, the retained personal data are deleted, destroyed, or anonymized.

7) Your Rights Regarding Your Personal Data and How You Can Exercise These Rights

Pursuant to Article 11 of the Turkish Personal Data Protection Law No. 6698 (“KVKK”) and Articles 13–22 of the European Union General Data Protection Regulation (“GDPR”), you have the following rights regarding your personal data processed by our Company:

- To learn whether your personal data are processed, and if so, to request information regarding such processing and access the relevant personal data and related information,
- To request the correction of inaccurate or incomplete personal data,
- To request the deletion, destruction, or anonymization of your personal data where the legal conditions are met,
- To request the restriction of the processing of your personal data in certain circumstances (for example, during the verification of the accuracy of the data),
- To object to personal data processing activities carried out based on legitimate interests due to reasons related to your particular situation,
- Where technically feasible, to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and to transmit those data to another data controller.

You may submit your requests regarding these rights in writing or via registered electronic mail (KEP), secure electronic signature, mobile signature, or through the electronic mail address previously notified to and registered in our Company's systems, in accordance with the Communiqué on the Principles and Procedures for the Request to the Data Controller.

Your applications will be evaluated and concluded within a maximum of 30 (thirty) days in accordance with the periods stipulated under the KVKK and GDPR. If the application requires an additional cost, a fee may be charged according to the tariff determined by the Personal Data Protection Board.

If you believe that your personal data are processed in violation of the GDPR, you have the right to lodge a complaint with the competent supervisory authority in the European Union where you habitually reside or, where appropriate, with the Turkish Personal Data Protection Authority.

You may submit your requests within the scope of Article 11 of the Law regulating the rights of the data subject, in accordance with the "Communiqué on the Principles and Procedures for the Request to the Data Controller," by sending them in writing to:

Cankurtaran Neighborhood, Ayasofya Square, Sultanahmet No:2 Fatih / Istanbul

or by e-mail to:

kvkk@hurremsultanhamami.com

For your information and convenience, an application form that you may use has been published on our website. Please click here to view the relevant form.

Data Controller

Haseki Tourism Health Construction Industry and Foreign Trade Ltd. Co.

Address:

Cankurtaran Neighborhood, Ayasofya Square No:2
Sultanahmet Fatih / Istanbul

E-mail:

kvkk@hurremsultanhamami.com