

PROTECTION AND PROCESSING OF PERSONAL DATA

RELATED DISCLOSURE TEXT

Pursuant to Law No. 6698 on the Protection of Personal Data ("Law"), Haseki Turizm Sağlık İnşaat San ve Dış Tic. Ltd. Şti ("Company"), in order to fulfill its obligation of disclosure arising from Article 10 of the Law, presents the following issues to the information and review of its members and customers with this Clarification Text.

This Clarification Text applies to all visitors ("Visitor") using "shop.hurremsultanhamami.com" ("Site") and the Company's services and/or all persons ("Buyer") who benefit / request to benefit from the Company's services through physical / distance sales and purchase the products and services offered for sale by the Company and all personal data provided to the Company.

Apart from this Clarification Text, you can get detailed information on the subject by accessing the Company's Personal Data Protection and Privacy Policy on our website.

1. Disclosure by the Data Controller

Your personal data that you have shared during the membership and/or purchase process, such as name, surname, date of birth, TR Identity Number (Passport Number for those who are not Turkish Citizens), mobile phone number, e-mail address, gender, address, information that you have approved to be shared through social media channels in case of connection with your social media accounts, in cases where identity presentation is required, your personal data contained in documents for identification such as identity card, passport, driver's license are stored and processed by our Company as data controller. The Company attaches importance to the confidentiality and protection of your personal data while providing its services; In accordance with the Law, your personal data obtained / to be obtained by the Company in its capacity as Data Controller or shared or to be shared with the Company by you will be processed by the Company only within the scope described below and in the ways stipulated in the Law.

2. Collection and Processing of Your Personal Data

Your personal data may be collected verbally, in writing or electronically in accordance with the Law through channels such as the Company's websites, social media accounts, mobile applications, branches/clubs, sales and marketing units, customer forms, digital marketing, contracts, applications, forms, offers, cookies used in "site" visits. In addition, as detailed below, camera recordings are made for security purposes and these recordings are kept temporarily. Your personal data obtained within the scope of the Law and other legislation in written, verbal or electronic media by the Company and the Company's branches / clubs, affiliated companies on behalf of the Company or through websites in the capacity of data controller; It can be recorded, stored, stored, stored, preserved, changed in the ways stipulated in the Law, shared with other persons deemed appropriate by the Company for legal, legal reasons or in line with the actual requirements of the service provided by the Company and/or with the relevant third party natural person / legal entities in Turkey or abroad, and can be processed, including transferring it abroad.

3. Purposes and Legal Reasons for Processing Your Personal Data

Your personal data is stored and processed by our Company as the Data Controller based on the legal grounds of "explicitly stipulated in the laws" pursuant to Article 5/2.a of the Law and "it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract" pursuant to Article 5/2.c. In this context, your personal data is processed by our Company for the realization of subscription/membership transactions and/or physical/distance sales transactions; in accordance with the Law No. 6502 on Consumer Protection, Distance Contracts Regulation and Subscription Contracts Regulation; Tax Procedure Law No. 213 for the realization of the invoice process and accounting transactions within the framework of the consumer relationship between the parties and the Turkish Commercial Code No. 6102 to which our Company is subject, based on the legal reason "clearly stipulated in the Laws" and stored until you are notified by you and until the legal period and reasons expire.

However, since your personal data is directly related to the establishment of the membership and/or distance/physical sales contract, the performance of the services within this scope, the collection transactions to be made within this scope, and to ensure the efficiency of the service relationship, to inform the consumers about the massage, skin care, body care services purchased as a single session and / or Massage / Care Package and / or to create and organize the member's personal account on the Site. c of the Law in order to inform the members and customers about the campaigns and opportunities within the scope of this law or to inform the members and customers about the campaigns and opportunities within the scope of this law or to inform the members and customers about the price related to the service, provided that it is directly related to the establishment or performance of a contract, based on the legal reason "It is necessary to process personal data belonging to the parties to the contract" or if approval is given within the scope of the Law No. 6563 on the Regulation of Electronic Commerce, The personal data belonging to the parties of a contract are stored and processed by our Company in the capacity of Data Controller for purposes such as marketing, providing other opportunities, offers and information, establishing effective communication with members and customers, or in order to ensure the control of the systems in which the services are provided and to improve these systems, to prevent unlawful use of the services, and are stored until notified by you and until the legal period and reasons expire.

You can find detailed information on the issues of 5/2.a "clearly stipulated in the laws" and 5/2.c "It is necessary to process personal data belonging to the parties of the contract, provided that it is directly related to the establishment or performance of a contract" in our Company's Personal Data Protection Policy.

4. Persons and / or Organizations to Which Your Personal Data May Be Transferred

For the purposes specified in the Law and this Clarification Text, the persons / organizations to whom your personal data that you share with the Company may be transferred within the scope of the Law; All kinds of official authorities and institutions, the Company's shareholders and direct / indirect domestic / foreign affiliates, software program-service partner individuals and organizations that the Company receives / cooperates with to carry out its activities, banks for collection purposes and / or institutions authorized by collection and domestic / foreign organizations and other relevant third parties for the execution of the relevant activity for these purposes.

5. Use of Cookies

Cookies are text files containing small pieces of information loaded by your internet browser when you visit the Website and stored on your computer, mobile phone or tablet. The Company will collect and securely store your browsing information in order to provide better service to Site Visitors, to inform Visitors and Members about campaigns and advantages and within the framework of its legal obligations, provided that it is not used outside the purpose and scope specified in this Clarification Text Regarding Your Personal Data and stipulated in other legislation; It will be able to share it with third parties if necessary. The Website uses session cookies that expire when you close your browser and persistent cookies that remain on your hard disk for a long time. You can delete all cookies or data belonging to the site or reject all cookies from the settings section of your internet browser. If you refuse cookies, you may continue to use the site, but you may not be able to access all functions of the site or you may have limited access. In order for third-party providers, including Google Inc., to display Website advertisements in the banner areas of publisher sites on the internet, they need to collect information about advertisements, optimize and publish advertisements based on visitors' past visits to the Website. For this purpose, first-party cookies and third-party cookies are used together by the Website and third-party providers including Google Inc.

6. Information on Security Cameras

In our clubs, businesses and facilities, video recordings are made to ensure security by means of security cameras in areas deemed appropriate by our Company, except for changing rooms and toilets. The personal data in question is processed automatically based on the legal reason "it is mandatory for the data controller to fulfill its legal obligation" and "data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject" in Article 5 of the Law. Such personal data may be transferred to judicial authorities or relevant law enforcement agencies upon request in accordance with the relevant legislation. This data is not transferred and/or shared with 3rd parties for any other reason by our Company. These data are kept according to the hard disk capacity of the relevant club, but in any case for a period not exceeding 1 month, and unless requested by any official authority and / or law enforcement agencies, they are destroyed at the end of this period due to overwriting the existing image with a new image.

7. Cases where the Company may process your personal data without explicit consent in accordance with the Law

Pursuant to Article 5 of the Law, in the following cases, the Company may process your personal data mentioned above and obtained in accordance with the law without seeking your explicit consent:

- In cases expressly provided for by law,
- If you are unable to disclose your consent as a data subject due to actual impossibility or if it is mandatory to process your personal data for the protection of your or someone else's life or physical integrity in cases where your consent is not legally valid,
- If it is necessary to process personal data of the parties to a contract, provided that it is directly related to the conclusion or performance of the contract,
- If it is mandatory for the Company to fulfill a legal obligation,

- If your personal data has been made public by you,
- If data processing is mandatory for the establishment, exercise or protection of a right,
- In the event that data processing is mandatory for the legitimate interests of the Company, provided that it does not harm your fundamental rights and freedoms.

8. What are your rights under the Law?

By applying to our Company in accordance with Article 11 of the Law;

- a. To learn whether your personal data is being processed or not,
- b. Requesting information if your personal data has been processed,
- c. To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom your personal data is transferred domestically or abroad,
- e. To request correction of your personal data in case of incomplete or incorrect processing,
- f. To request the deletion or destruction of your personal data within the framework of the conditions stipulated in Article 7 of the Law,
- g. To request notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom your personal data have been transferred,
- h. To object to the occurrence of a result against you by analyzing the processed data exclusively through automated systems,
- i. In case you suffer damage due to unlawful processing of your personal data, you have the right to demand compensation for the damage.

9. Application

You can submit your applications and requests regarding your personal data by using the Data Subject Application Form;

By sending it to "Cankurtaran Mahallesi, Hagia Sophia Square No:2 Sultanahmet Fatih ISTANBUL", which is the headquarters address of the company with wet signature and copy of identity card,

By applying to our Company in person with a valid identity document,

You can send it to our e-mail address "info@hurremsultanhamami.com" from your e-mail address previously notified to our Company and registered in our system.

In accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller, it is obligatory to include the name - surname, signature if the application is in writing, T.R. identification number (passport number if the applicant is a foreigner), residential or workplace address for notification, e-mail address for notification, telephone number and fax number, and information on the subject of the request.

The data subject must clearly and comprehensibly state the requested matter in the application, which will be made by the data subject to exercise the above-mentioned rights and includes explanations regarding the right he / she requests to exercise. Information and documents regarding the application must be attached to the application.

Although the subject of the request must be related to the applicant's person, if acting on behalf of someone else, the applicant must be specifically authorized in this regard and this authority must be documented (special power of attorney). In addition, the application must contain identity and address information, and documents confirming the identity must be attached to the application.

Requests made by unauthorized third parties on behalf of someone else will not be evaluated.

Your requests regarding your personal data will be evaluated and answered within 30 days at the latest from the date of receipt by our Company. In the event that your application is evaluated negatively, the reasons for the reasoned rejection will be communicated to you via e-mail or postal mail to the address you specified in the application, if possible, through the procedure in which the request was made.

However, if the requested transaction requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board will be charged by us within the scope of Article 13 of the Law.

Haseki Turizm Sağlık İnşaat San ve Dış Tic. Ltd. Şti.

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