

# PROTECTION OF PERSONAL DATA

## Employee Clarification Text

According to the Personal Data Protection Law No. 6698 ("Law"), HILKA TURİZM TİCARET ANONİM ŞİRKETİ (hereinafter referred to as "J'adore Deluxe Hotel & Spa") is defined as the data controller because it processes your personal data. According to Article 10 of the Law, titled "Obligation to Inform," data controllers are obliged to inform real persons whose personal data they process on certain matters. This text has been prepared by J'adore Deluxe Hotel & Spa in order to ensure compliance with the legislation as well as to be transparent and accountable.

## Definitions

- **Obligation to inform:** The obligation of the data controller or the person authorized by them to inform the relevant persons during the acquisition of personal data regarding the identity of the data controller, the purpose for which the personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data, and other rights listed in Article 11 of the Law.
- **Relevant person (Data subject):** The real person whose personal data is processed.
- **Personal data:** Any information relating to an identified or identifiable real person.
- **Processing of personal data:** Any operation performed on data such as obtaining, recording, storing, preserving, altering, reorganizing, disclosing, transferring, taking over, making available, classifying, or preventing the use of personal data by fully or partially automated means or non-automated means provided that it is part of any data recording system.
- **Data controller:** The real 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.

## Your Processed Personal Data, Purposes, and Legal Grounds by Processes

Human Resources / Employment & Payroll Operations (İnsan Kaynakları ve Özlük Operasyonları)

Processed Personal Data	Process Description / Detail
<b>Identity: Name, Surname, T.C. ID Number, Passport Number / ID Serial Number, Place and Date of Birth, Gender, Marital Status, Nationality, Signature</b>	We process your above-mentioned personal and special category data for execution of human resources, recruitment, legal payroll, and occupational health and safety (OHS) operations.
<b>Contact: Phone Number, Address, E-mail</b>	

## Address

**Personnel: Employment Contract, Resume (CV), Certificate of Graduation/Diploma, Military Status Document, Criminal Record, Family/Dependent Status (AGI details), Bank Account Information / IBAN, Entry-Exit Tracking Data**

**Health & Special Categories: Health Report / Periodic Examination Form, Blood Type, Disability Status (if applicable)**

- **Purpose: Execution of Employment Contracts and Legal Personnel File Obligations**

Legal Basis: Processed based on KVKK Art. 5/2(c): "Processing of personal data belonging to the parties of a contract is necessary, provided that it is directly related to the conclusion or fulfillment of that contract" and Art. 5/2(ç): "It is mandatory for the data controller to fulfill its legal obligation."

- **Purpose: Execution of Finance, Accounting, and Salary Payment Operations**

Legal Basis: Processed based on KVKK Art. 5/2(ç): "It is mandatory for the data controller to fulfill its legal obligation."

- **Purpose: Fulfilling Occupational Health, Safety, and Legal Medicine Operations**

Legal Basis: Processed based on KVKK Art. 6/3 regarding special categories of personal data (health data processed by persons under the obligation of secrecy or competent institutions for the purposes of preventive medicine, medical diagnosis, treatment, and care services).

## Data Collection Method

Your personal data is obtained physically through documents submitted during application and onboarding stages (such as job application forms, resumes, and personnel file documents) or electronically via job listing portals and automated digital tracking systems.

## Data Transfer and Sharing

- Your personal data is transferred to the Social Security Institution (SGK) and the Ministry of Labor and Social Security to meet official notifications and legal obligations.
- Your identity and financial data are shared with contracted banking institutions for salary, bonus, and allowance payments.
- In addition, personal data may be shared with authorized public institutions (such as courts, ministries, and law enforcement) upon official request in accordance with the law and within the legal limitations.

- Outside of legal necessity and performance of the contract, your personal data is not transferred to unverified third parties.

## **Your Rights Regarding Your Personal Data**

Relevant persons must first submit their requests regarding their personal data to the data controller. In accordance with the Law, you can exercise the following rights:

- To learn whether your personal data is processed,
- To request information if your personal data has been processed,
- To learn the purpose of processing your personal data and whether they are used appropriately for their purpose,
- To know the third parties to whom your personal data is transferred at home or abroad,
- To request correction of your personal data if it is incomplete or incorrectly processed,
- To request the deletion or destruction of your personal data in the event that the reasons requiring its processing cease to exist,
- To request notification of the operations made pursuant to the clauses of correction, deletion, or destruction to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing your processed data exclusively through automated systems,
- To request the compensation of the damage in case you suffer damage due to unlawful processing of personal data.

## **Application Method**

You can submit your application:

- In writing to: KARDELEN MAH. 2164 CAD. AKKENT 1 SITESİ SİTESİ 4.BLOK NO: 3/4 İÇ KAPI NO: 4 YENİMAHALLE / ANKARA,
- Via secure electronic signature or mobile signature to: hilkaturizm@hs01.kep.tr,
- Via e-mail to: kvkk@jadorehotel.com using the same e-mail address, provided that your electronic mail address is registered in our system.

Mandatory elements in your application: Your name, surname, and signature if the application is in writing; Your T.C. ID number for citizens of the Republic of Turkey; your nationality, passport number, or ID number (if any) if you are a foreigner; Your residential or workplace address for notification; Your electronic mail address, telephone, and fax number (if any) for notification; and the subject of your request. It is mandatory to include these elements, and any information and documents related to the subject must also be attached to the application. J'adore Deluxe Hotel & Spa reserves the right to verify your identity.