

# PROTECTION OF PERSONAL DATA

## Security Cameras 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

#### Physical Space Security (Fiziksel Mekan Güvenliği)

Processed Personal Data	Process Description / Detail
Physical Space Security: Security Camera Footage (Video Recording)	We process your camera footage personal data captured via security cameras located in our service areas.

- **Purpose: Ensuring Physical Space Security**

Legal Basis: Processed on the basis of KVKK Art. 5/2(f): "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."

• **Purpose: Creating and Tracking Visitor Records**

Legal Basis: Processed on the basis of KVKK Art. 5/2(f): "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."

## **Data Collection Method**

Your personal data is obtained automatically through security cameras recording 24/7 in our hotel premises and service fields.

## **Data Transfer and Sharing**

- Your personal data may be transferred to competent judicial and administrative authorities (such as law enforcement agencies, courts, and ministries) upon request, within the framework of legal provisions and in accordance with KVKK Art. 28/1, without any obligation to inform and without obtaining your explicit consent.
- Apart from these official requests and legal obligations, your camera records are strictly not shared or transferred to any third party.

## **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.