

PROTECTION OF PERSONAL DATA

Website Visitor / Cookie Clarification Text

Web Sitesi Ziyaretçisi / Çerez Aydınlatma Metni

According to the Law on Protection of Personal Data No. 6698 ("Law"), HİLKA TURİZM TİCARET ANONİM ŞİRKETİ (hereinafter referred to as "J'adore Deluxe Hotel & Spa ") is defined as the Data Controller due to processing personal data related to you. Pursuant to Article 10 of the Law titled "Clarification Obligation", data controllers are obliged to inform natural persons whose personal data they process on certain matters. This text has been prepared by J'adore Deluxe Hotel & Spa in order to both ensure compliance with the legislation and demonstrate transparency and accountability.

I. DEFINITIONS

- **Clarification Obligation:** The obligation of the data controller or the person authorized by them to inform the relevant data subjects during the collection of personal data regarding the identity of the data controller, the purposes of personal data processing, to whom and for what purposes the processed personal data may be transferred, the method and legal ground of personal data collection, and other rights listed in Article 11 of the Law;
- **Data Subject (Relevant Person):** The natural person whose personal data is processed. Due to your visit to our website with the domain name www.jadorehotel.com, since we process some of your personal data through cookies and other identifiers, you are defined as the 'data subject' under the Law;
- **Personal Data:** Any information relating to an identified or identifiable natural person;
- **Processing of Personal Data:** Any operation performed on personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available, alignment, combination, restriction, erasure, or destruction, whether or not by automated means, or non-automated means provided that it forms part of a data filing system;
- **Data Controller:** The natural or legal person who determines the purposes and means of the processing of personal data and is responsible for the establishment and management of the data filing system. J'adore Deluxe Hotel & Spa is the data controller that determines the purposes and means of processing personal data regarding you.

II. INFORMATION ABOUT COOKIES

A. WHAT IS A COOKIE?

Cookies describe technologies such as cookies, advertising IDs, and web identifiers (all of these technologies will be referred to as "Cookie" or "cookie" in the remainder of the text). Cookies are very small text files, usually consisting of letters and numbers, saved on your computer (or other devices such as smartphones or tablets) by the websites you visit through browsers. Cookies enable the recognition of the user and their device, and allow the storage of some information

regarding the user's preferences and transaction history. Cookies are created by the servers managing the website you visit. Thus, when the visitor visits the same site again, the server can understand this. Cookies can be compared to identity cards that show website owners that the same visitor is re-visiting the site. For more detailed information about cookies, you can visit <https://www.aboutcookies.org> and <https://www.allaboutcookies.org>.

Obtaining Personal Data via Cookies

When you first visit our website, you are presented with a screen regarding your cookie preferences. In accordance with the cookies you allow on this screen, the relevant cookies are stored in your browser/device. Each cookie generally contains the following elements: the server from which the cookie was sent, the predetermined lifetime of the cookie, and a usually randomly generated unique identifier value/number (the website server sending the cookie uses this value to recognize you when you navigate between pages).

Classification of Cookies by Intended Use

Data via cookies is collected through fully automated methods. Cookies can be classified in terms of their owners, lifetimes, and intended use purposes:

- **By Owner (First-Party / Third-Party):** Cookies placed on your device by the website you visit are first-party cookies, while cookies offered by third parties are third-party cookies. First-party cookies are provided by J'adore Deluxe Hotel & Spa , while third-party cookies are provided by different companies that are service providers or business partners.
- **By Lifetime (Session / Persistent):** Session cookies are deleted as soon as the visitor leaves the website, while persistent cookies are stored on visitors' devices for their predetermined lifetime and are used to remember the visitor and their preferences during their next visit.
- **By Purpose of Use (Strictly Necessary / Functional / Analytical / Marketing):** Strictly necessary cookies for the operation of the site, analytical cookies, and targeting/advertising cookies are used according to their purposes.

B. DATA COLLECTED THROUGH COOKIES, PURPOSES OF USE, AND LEGAL GROUNDS

Through cookies; your browser and operating system, IP address, User ID, date and time of your visit, access status, use of features on the website, search terms entered, how often you visit our website, your language preferences, and user transaction logs including the actions you perform on the pages are collected and processed.

Cookies are used to ensure the stable execution of your visit and your experience on our website, to remember your information on your next use, to improve the operation and content of the site, to statistically evaluate the site usage, to present the content on the site in the most effective way for you and your device, and to offer customized services and advertisements to users in line with their choices and usage habits.

Cookies are divided into various categories based on their purpose and functions. Below are the cookies used on our website by category, their providers, foreign countries to which personal

data may be transferred via cookies, and the specific use purposes and legal grounds for each cookie category:

1. Strictly Necessary Cookies

These cookies are necessary for the use and functionality of the website. If strictly necessary cookies are disabled, access to part or all of the site may not be possible. Personal data processed through strictly necessary cookies is processed for the purposes of offering products and services and conducting activities in accordance with the legislation, based on the legal ground stipulated in KVKK Art. 5/2(e): 'Data processing is mandatory for the establishment, exercise or protection of a right.'

Cookie	Type	Duration	Description
tz	1st Party (your-domain.com)	During Session	Detects the user's browser time zone.
ci_session	3rd Party (google.com)	During Session	Stores session information for the live support system.

2. Functional Cookies

Functional cookies help perform certain functions such as sharing website content on social media platforms, collecting feedback, and other third-party features. Functional cookies are also used to remember users' preferences on the website. For example, it saves usage preferences such as language, currency preference, and the 'remember me' choice to avoid re-asking login details from the same browser on subsequent visits. Personal data processed through functional cookies is processed based on your explicit consent stipulated in KVKK Art. 5/1 to remember preferences and improve customer experience. Cookies originating from abroad are processed and shared with foreign cookie providers based on your explicit consent and appropriate safeguards provided under KVKK Art. 9.

Cookie	Type	Duration	Description
SEARCH_SAMESITE	3rd Party (google.com)	6 months	Dropped by Google for security and compliance.

3. Analytical Cookies

Analytical cookies collect information about how users use the website. These cookies are used to improve/develop user experiences. They collect information such as pages viewed by users, number of clicks, scrolling movements, and entry/exit times to these pages. Personal data processed through analytical cookies is processed based on your explicit consent under KVKK Art. 5/1 for conducting marketing analysis studies and tracking visitor records. Internationally sourced cookies are shared with foreign cookie providers based on explicit consent and safeguards under KVKK Art. 9.

Cookie	Type	Duration	Description
_ga	1st Party (your-domain.com)	2 years	Google Analytics cookie. Collects visitor statistics anonymously.
_ga_MMRTHNSNBK	3rd Party (google.com)	2 years	Google Analytics 4 customized cookie. Analyzes user behavior.

4. Marketing Cookies

These cookies are used to present advertisements/campaigns according to users' interests and to measure the effectiveness of marketing efforts. Personal data processed through marketing cookies is processed based on your explicit consent under KVKK Art. 5/1 for carrying out marketing and advertising/campaign/promotion processes. Internationally sourced cookies are shared with overseas cookie providers based on explicit consent and appropriate safeguards under KVKK Art. 9.

Cookie	Type	Duration	Description
_gcl_au	1st Party (sural.com.tr)	3 months	Google Ads cookie. Used to measure ad conversions.

C. HOW TO PREVENT THE USE OF COOKIES

The use of cookies helps the website provide a better service; however, you can block the use of cookies if you wish. To block cookies, you need to change the settings of your internet browser. These settings may vary depending on the device and browser you use. Below is information about the steps to follow on different internet browsers to block the use of cookies:

- **Microsoft Edge:** Click on the three dots icon in the upper right corner of your browser and go to Settings. Click on Choose What to Clear and select the sections you want to clear. You can start the clearing process by making your choice.
- **Google Chrome:** Open Chrome on your computer. Click More Settings in the top right corner. Click Advanced. Under "Privacy and Security", select Content Settings. Click Cookies. Under "All cookies and site data", find the website. Click the Remove icon next to the site.
- **Mozilla Firefox:** Click the Firefox Menu button and select Options. Select the Privacy & Security section, then go to History. Check "Firefox will use custom settings for history". Click the Show Cookies... button. In the Search: field, type the name of the website you want to delete. Select the cookies you want to delete and click Delete Selected. Close the Cookies window and then close the about:preferences page.

- **Safari:** Select Safari > Preferences. Click Privacy. Click Website Data. Select one or more websites and then click Delete or Delete All.

Apart from cookies, we may also process your personal data through different identifiers. We may record your various personal data during your navigation and transactions on our site. Since different data is processed during different navigation stages, activity-based information is provided under the process titles below.

III. PERSONAL DATA PROCESSED BY PROCESSES, PURPOSES OF PROCESSING, AND LEGAL GROUNDS

In Case You Only Visit the Site and Leave;

Operation / Process	Description / Detail
We Process Your Following Personal Data:	Transaction Security, Connection Time, Connection End Time, IP Address, IP Protocol Used, Amount of Data Transferred
Our Personal Data Processing Activities, Purposes, and Legal Grounds Are as Follows:	For the purposes of ensuring compliance of activities with legislation and information security processes (keeping website traffic information) based on KVKK Art. 5/2(a) 'Explicitly stipulated in laws' (Pursuant to Article 5 of the Law No. 5651 on Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications).
We Collect Your Personal Data as Follows:	Your personal data is obtained through automated methods by performing actions in a computer environment.
Your Personal Data is Shared/Transferred in the Following Cases:	<p>Your personal data may be transferred to relevant authorities upon request within the framework of KVKK Art. 28/1 without the obligation of clarification and without seeking your explicit consent.</p> <p>In addition, in unforeseen situations, your personal data may be transferred to authorized public institutions (such as administrative authorities like Ministries) upon request within the scope of the purposes and limitations provided by law, in cases explicitly stated in the laws.</p> <p>Apart from our legal obligations that do not require clarification obligation and explicit consent; with reference to Law Art. 8, it is</p>

transferred based on 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' to the contracted firm whose data center is located in the country for the purpose of Execution / Audit of Business Activities (Provision of Site Data Center Infrastructure).

IV. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

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

- To learn whether your personal data is being 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 in accordance with 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 processed incompletely or incorrectly,
- To request the deletion or destruction of your personal data in case the reasons requiring its processing cease to exist,
- To request notification of the operations carried out in accordance with the correction, deletion, or destruction steps to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing the processed data exclusively through automated systems,
- To request compensation for the damage in case you suffer damage due to the unlawful processing of personal data.

V. APPLICATION METHOD

You can submit your application via:

- In writing to the address: 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 the address: hilkaturizm@hs01.kep.tr,
- By sending an e-mail to kvkk@jadorehotel.com using your e-mail address, provided that your e-mail address is registered in our system.

Mandatory requirements in your application: Your name, surname, and signature (if the application is in writing); Your T.R. identity number for citizens of the Republic of Turkey; your

nationality, passport number, or identity number (if any) if you are a foreigner; Your residential or workplace address for official notification; Your e-mail address, telephone, and fax number (if any) for notification; and the subject of your request must be present, and information and documents related to the subject should be attached to the application. J'adore Deluxe Hotel & Spa reserves the right to verify your identity. You can access the procedural rules and more detailed information from the "Communiqué on the Procedures and Principles of Application to the Data Controller" of the Personal Data Protection Authority.