

**ALTINAY TURİZM VE TİCARET ANONİM ŞİRKETİ**  
**PRIVACY NOTICE REGARDING THE PROVISION OF PHYSICAL PREMISES SECURITY**

**1. Data Controller**

Altınay Turizm ve Ticaret Anonim Şirketi  
Cumhuriyet Bul. Siteler No:15 Marmaris / Muğla

Altınay Turizm ve Ticaret Anonim Şirketi ("**Company**") highly respects your privacy and your rights regarding the protection of your personal data, and in this context, we maintain a high standard of protection for your personal data by taking all necessary technical and administrative measures to ensure its security.

Accordingly, within the scope of physical premises security activities carried out at the hotel premises, we hereby inform you, **our valued visitors**, through this Privacy Notice Regarding The Provision of Physical Premises Security ("**Privacy Notice**"), in our capacity as data controller, regarding the categories of your personal data that are processed; the methods of collection; the purposes and legal bases of processing; the recipients and purposes of potential data transfers; and the procedures for exercising your rights as set forth in Article 11 of the Law No. 6698 on the Protection of Personal Data ("**LPPD**"), as well as in accordance with Article 10 of the LPPD and the Communiqué on the Principles and Procedures to Be Followed in the Fulfillment of the Obligation to Inform.

**2. Collection Methods of Your Personal Data**

The Company may collect your limited personal data in the data categories listed in the table below, either wholly or partly, by automated means or, provided that the process is part of any data filing system, through non-automated means, from electronic and/or physical media, the Company's headquarters, hotel premises, reception desks, security units, physical and electronic written forms, and closed-circuit television (CCTV) systems.

**3. Personal Data Categories, Purposes of Processing, and Legal Grounds**

Your personal data categories\* processed within the scope of the provision of physical security services, the purposes of processing and legal grounds for the processing and transfer of your personal data are detailed in the tables below.

\*For detailed information on data categories, you may review pages 74 et seq. of the Data Controllers Registry Information System Guide published by the Personal Data Protection Authority. For detailed information about the types of your personal data processed by the Company, you can apply as described in section 5.

Data Categories	Legal Grounds	Processing Purposes
Identity	Pursuant to Art. 5/2(f) of the LPPD, provided that it does not harm the fundamental rights and freedoms of the data subject, for the legitimate interests of the data controller.	Ensuring physical premises security, and the safety of employees and customers Protection of movable assets/resources Creation and monitoring of visitor logs Execution, supervision, and continuity of business operations Handling of requests and complaints, and management of customer relations and satisfaction Ensuring the security of the Company's operations Follow-up of legal and compliance matters Provision of information to authorized persons, institutions, and authorities

		Management of retention and archiving activities
<b>Physical Premises Security</b>	<p>Pursuant to Art. 5/2(a) of the LPPD, provided that it is explicitly stipulated by laws;</p> <p>Pursuant to Art. 5/2(c) of the LPPD, provided that it is necessary for the data controller to fulfil its legal obligations.</p>	<p>Ensuring physical premises security, and the safety of employees and customers</p> <p>Protection of movable assets/resources</p> <p>Creation and monitoring of visitor logs</p> <p>Execution, supervision, and continuity of business operations</p> <p>Handling of requests and complaints, and management of customer relations and satisfaction</p> <p>Ensuring the security of the Company's operations</p> <p>Follow-up of legal and compliance matters</p> <p>Provision of information to authorized persons, institutions, and authorities</p> <p>Management of retention and archiving activities</p>
<b>Audiovisual Data</b>	Pursuant to Art. 5/2(f) of the LPPD, provided that it does not harm the fundamental rights and freedoms of the data subject, for the legitimate interests of the data controller.	<p>Ensuring physical premises security, and the safety of employees and customers</p> <p>Protection of movable assets/resources</p> <p>Creation and monitoring of visitor logs</p> <p>Execution, supervision, and continuity of business operations</p> <p>Handling of requests and complaints, and management of customer relations and satisfaction</p> <p>Ensuring the security of the Company's operations</p> <p>Follow-up of legal and compliance matters</p> <p>Provision of information to authorized persons, institutions, and authorities</p> <p>Management of retention and archiving activities</p>
<b>Legal Transaction</b> <i>(Legal transaction information may only be processed in cases whether a legal dispute arises).</i>	<p>Pursuant to Art. 5/2(e) of the LPPD, provided that the processing of personal data is necessary for the establishment, exercise or protection of a right;</p> <p>Pursuant to Art. 5/2(f) of the LPPD, provided that it does not harm the fundamental rights and freedoms of the data subject, for the legitimate interests of the data controller.</p>	<p>Execution of activities in accordance with the legislation</p> <p>Follow-up of legal and compliance matters</p> <p>Provision of information to authorized persons, institutions, and authorities</p> <p>Management of retention and archiving activities</p>

#### 4. Transfer of Your Personal Data

Your personal data processed within the scope of the provision of physical security services, may be transferred to the recipient groups listed below, provided that the conditions for transfer stipulated under Articles 8 and/or 9 of the LPPD are met:

Transferred Parties	Transferred Data Categories	Transfer Purpose
<b>Our suppliers</b> <i>(e.g., legal consultants)</i>	Identity Physical Premises Security Audiovisual Data	Primarily for the execution of transactions through our supplier and for carrying out our corporate

	Legal Transaction	activities, as well as for the purposes specified under each data category above
<b>Authorised public institutions and organisations</b> <i>(örn. law enforcement agencies, courts and prosecutor's offices)</i>	Identity Physical Premises Security Audivisual Data Legal Transaction	Primarily for the fulfilment of our legal obligations and the establishment, exercise, and protection of our rights in the event of a dispute, as well as for the purposes specified under each data category above

## 5. Your Rights as Data Subjects

Your rights as data subject stipulated under article 11 of the LPPD, and you may submit your applications regarding your rights to the Company in accordance with the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller (in writing or via registered electronic mail address, secure electronic signature, mobile signature or your e-mail address that you have previously notified to our Club and registered in our systems, along with the information/documents\* required to verify your identity to determine that you are the rightful data subject).

**\*Important Note:** We would like to kindly remind that no special categories of personal data (e.g. religion or blood type information) should be included in the scope of data subject applications.