



PERSONAL DATA PROCESSING INFORMATION NOTICE FOR OUR GUESTS REGARDING SPA SERVICES

Dear Guest,

Thank you for choosing us.

We would like to inform you, within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698 (the "Law"), regarding the personal data processing activities we will carry out in connection with your stay. In this respect, the data controller under the Law is **Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim Şirketi** (the "Company").

WHY DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data for the following purposes:

- Performance of the contract related to the spa service;
- Compliance with legal obligations within the scope of spa services;
- Creation and planning of spa reservations;
- Safe delivery of the service;
- Determination of applications suitable for your health condition;
- Evaluation of health conditions that may affect the service (pregnancy, allergy, chronic illness, past surgery, etc.);
- Ensuring and improving service quality;
- Ensuring guest satisfaction;
- Carrying out operations related to the service to be provided to you as a guest;
- Meeting your special requests as a guest and preparing special amenities/treats;
- Managing product sales, gift care, and package processes;
- Ensuring the effectiveness, efficiency, and appropriateness of our hospitality and SPA services at the highest level;
- Managing cancellation, change, and late-arrival processes;
- Planning SPA reservations, ensuring capacity management, and carrying out service organization;
- Monitoring usage restrictions for guests under the age of 16;
- If you provide explicit consent, informing you about promotions and discounts and sending surveys for guest satisfaction;
- If you provide explicit consent, providing you with a better Spa experience during your next visit by remembering and/or recording your preferences and expectations;
- If you provide explicit consent, collecting your health data such as allergies and sensitivities and your special requests in order to meet your special needs and protect the health of you and your children.



BY WHICH METHODS AND ON WHAT LEGAL BASIS DO WE COLLECT AND STORE YOUR PERSONAL DATA?

In order to fulfill the purposes stated above, we may collect and store the personal data we need through reservation forms completed on our website, Spa reception forms, telephone, e-mail, and electronic environments.

We store your personal data in electronic environments digitally and/or in paper form in a manner accessible to our employees, managers, relevant technical support team, and archive personnel.

We collect your personal data on the basis of:

- Article 5/2(a) of the Law (explicitly stipulated by law),
- Article 5/2(c) (necessary for the establishment or performance of a contract),
- Article 5/2(ç) (necessary for compliance with legal obligations),
- Article 5/2(e) (necessary for the establishment, exercise, or protection of a right),
- Article 5/2(f) (legitimate interests), and where applicable,
- Article 6/2 (your explicit consent), and Article 6/3 (cases where processing of special categories of personal data is mandatory for the exercise of fundamental rights and freedoms / as permitted under applicable law).

DO WE SHARE YOUR PERSONAL DATA WITH OTHERS?

Within the scope of making a reservation for SPA services through the Company's website, we transfer the personal data we retain/collect to:

- authorized spa personnel for the execution of spa services,
- relevant departments within the scope of accounting and invoicing processes,
- and, within Türkiye, to our subsidiaries, group companies, and affiliates due to the presence of jointly authorized persons and employees, as well as the joint operation of server and information technology infrastructure and the joint execution of HR processes.

Such transfers are carried out:

- pursuant to Article 8/2(a) of the Law in reference to Article 5/2(f) (legitimate interests), and where applicable, pursuant to Article 8/2(b) in reference to Article 6/3 (where mandatory under the relevant legal grounds).

WHAT RIGHTS DO YOU HAVE TO PROTECT YOUR PERSONAL DATA?

Under the Law, you have the right to:

- Learn whether your personal data is processed,



- Request information regarding how your personal data is processed if it has been processed,
- Learn the purpose of processing your personal data and whether it is used in accordance with that purpose,
- Know the third parties to whom your personal data is transferred domestically or abroad,
- Request correction of your personal data if it is incomplete or incorrectly processed,
- Request deletion or destruction of your personal data within the framework of the conditions stipulated by the relevant legislation,
- Request notification of correction, deletion, and destruction processes carried out pursuant to the relevant legislation to third parties with whom your personal data has been shared,
- Object to the occurrence of a result against you by analyzing your processed personal data exclusively through automated systems,
- Request compensation for damages if you suffer damage due to unlawful processing of your personal data.

For detailed information regarding the above, you may contact the Company via **data.privacy@lujohotel.com**. However, requests submitted without complying with the form and content requirements stipulated by the Law and relevant secondary legislation may not be taken into consideration by the Company.

CONTACT INFORMATION

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