



## PERSONAL DATA PROCESSING AND PRIVACY POLICY

### INTRODUCTION AND SCOPE

This Privacy Policy (the "Policy") sets out the rules regarding personal data processed by **Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim Şirketi** (the "Company") during the use of the website operated and made available by the Company under the domain name <https://lujohotel.com/> (the "Website"). The purpose of the Policy is to ensure that the personal data of Data Subjects (persons whose personal data are processed during the use of the Website, hereinafter referred to as the "Data Subject") are processed in compliance with the Law No. 6698 on the Protection of Personal Data and other relevant legislation.

Use of the Website means that this Policy has been read, understood, and accepted. If you do not accept the rules set forth in this Policy, please immediately discontinue use of the Website.

If links are provided through the Website to third-party websites, applications, or similar elements, the websites, applications, or similar elements accessed as a result of using such links fall outside the scope of this Policy. In such cases, the privacy policy of the relevant website, application, or similar element may apply.

Data that do not constitute personal data and anonymized data fall outside the scope of this Policy.

### AMENDMENT OF THE POLICY

The Company reserves the right to amend the Policy at any time and in any manner it deems appropriate. Unless otherwise stated, the new version of the Policy shall enter into force upon publication on the Website or upon notification of Data Subjects through other communication methods.

### WHO IS THE DATA CONTROLLER FOR THE PROCESSING OF YOUR PERSONAL DATA?

For the purposes of processing your personal data under the Law No. 6698 on the Protection of Personal Data, the data controller is **Serkoç Otelcilik Turizm İnşaat Taahhüt Ticaret Anonim Şirketi**.

### OUR BASIC PRINCIPLES REGARDING THE PROCESSING OF YOUR PERSONAL DATA

When processing your personal data, we act in accordance with the following principles:



- Compliance with law and the principles of good faith,
- Accuracy and being up to date where necessary,
- Processing for specific, explicit, and legitimate purposes,
- Being relevant, limited, and proportionate to the purposes for which they are processed,
- Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

## **WHAT PERSONAL DATA OF YOURS ARE BEING PROCESSED?**

Within the scope of this Policy, the Company collects and processes the following personal data:

- **Identity Information:** Name, surname, Turkish ID number, passport information, etc.
- **Contact Information:** Phone number, e-mail address, address information
- **Customer/Guest Information:** Reservation information, accommodation information, request and complaint records
- **Financial Information:** Invoice information, bank account information
- **Transaction Security Information:** IP address, log records, internet access information
- **Visual and Audio Data:** Camera recordings, photographs
- **Human Resources Data:** Résumé/CV, education and experience information
- **Marketing Data:** Satisfaction surveys, campaign feedback
- **Special Categories of Personal Data:** Health information, disability status

## **WHAT ARE THE METHODS OF COLLECTING YOUR PERSONAL DATA AND THE PURPOSES OF PROCESSING?**

Your personal data may be collected by automatic or non-automatic means through the Website, call center, reservation systems, e-mail, physical forms, security cameras, Cookies, human resources application channels, and similar methods.

The Company may use your personal data to evaluate, resolve, and respond to your requests/suggestions/complaints. In addition, your collected personal data may be processed for purposes such as enabling the Company to fulfill its legal obligations.

## **WITH WHOM ARE YOUR PERSONAL DATA SHARED?**

The Company may share your personal data within the scope of this Policy, and any new personal data derived from processing them, with third parties from whom it receives support or services for the purpose of fulfilling the data processing purposes specified in the relevant section, and may share them domestically or abroad as necessary for the realization of such purposes.



Finally, your personal data may also be shared with judicial and administrative authorities, institutions, and organizations requesting them where required by law.

## **RETENTION OF YOUR PERSONAL DATA**

Your personal data will be retained for the periods required by the processing purposes of your personal data explained in the relevant section above, or for the periods required by law.

## **INFORMATION ON THE MEASURES TAKEN FOR THE SECURITY OF YOUR PERSONAL DATA**

In order to prevent unlawful processing of your personal data, unlawful access to your personal data, and to ensure that your personal data are stored securely, the Company takes all necessary technical and administrative measures to ensure an appropriate level of security and carries out the necessary audit activities.

Your personal data will not be processed by the Company in violation of this Policy, other policies enacted and implemented by the Company, or the rules set out in the Law No. 6698 on the Protection of Personal Data, and will not be shared with third parties in violation thereof.

## **WHAT RIGHTS DO YOU HAVE REGARDING YOUR PERSONAL DATA?**

You may exercise the following rights regarding the processing of your personal data by submitting a request to the Company:

- Learn whether your personal data are processed,
- Request information if your personal data have been processed,
- Learn the purpose of processing your personal data and whether they are used in accordance with that purpose,
- Know the third parties to whom your personal data are transferred domestically or abroad,
- Request correction of your personal data if they are incomplete or incorrectly processed,
- Request deletion or destruction of your personal data within the framework of the conditions stipulated in 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 have 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.



Requests you submit in order to exercise your rights regarding your personal data will be concluded within no later than thirty (30) days by notifying you accordingly.

As the Data Subject, you may update your personal data within the scope of this Policy so that they remain complete, accurate, and up to date, and also when any change occurs in such personal data. Otherwise, the Company shall bear no liability.

## **OUR CONTACT INFORMATION**

For questions regarding this Policy and to exercise your rights relating to your personal data, you may contact the Company using the information below. However, communications made without using the legal methods and without complying with the form and content requirements prescribed by the relevant law may not be taken into consideration by the Company.

## **CONTACT INFORMATION**

**MERSIS No:** 6257233253500001

**Address:** Meşelik Mah. Çomça Mevkii Sok. No: 10 Milas/MUĞLA

**Phone:** 02523115555

**E-Mail:** [info.bodrum@lujohotel.com](mailto:info.bodrum@lujohotel.com), [data.privacy@lujohotel.com](mailto:data.privacy@lujohotel.com)