

AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş. CLARIFICATION TEXT

This clarification text has been prepared to inform you about how your personal data is used by the data controller for what purpose, how and for what reason it is processed, with whom it is shared and for how long it is stored. Disclosure is made within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698.

We as **AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.** ("Workplace"), present this clarification text we have prepared in accordance with Article 10 of the Law on the Protection of Personal Data No. 6698 ("Law") and that contains information about the personal data processing activity, specifically for the security camera and video and audio recording of the workplace, to the public and to the data subjects.

ARTICLE 1: DATA CONTROLLER

Your personal data, in the capacity of data controller **AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.** may be processed within the scope described below. What should be understood from the concept of data controller is: Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.

You can use the following channels to contact the data controller:

Address : Boğazkesen Cad. Tomtom Kaptan Sok., No:18
Beyoğlu/İstanbul

Telephone : (212) 292 49 49

ARTICLE 2: PROCESSED PERSONAL DATA AND PURPOSE OF PROCESSING PERSONAL DATA

The person referred to as "customer" in this clarification text is technically "the person receiving the product or service", and "the person receiving the product or service" should be understood wherever the term "customer" is used.

The categories of personal data belonging to the customers that are processed by us are listed below, and each data category is processed for the purposes stated opposite:

- a- Execution of Identity / Communication activities
- b- Philosophical belief, religion, sect and other beliefs / Conducting communication activities
- c- Communication / Execution of communication activities and accounting activities
- d- Customer Transaction / Execution of Payment Activities / Execution of communication activities / For the purpose of surveying the person receiving the product or service / Performance of Other Service / Execution of activities in accordance with the legislation

ARTICLE 3: THE PARTIES THAT PERSONAL DATA MAY BE TRANSFERRED TO AND THE PURPOSE OF TRANSFER

Of the personal data subject to this clarification text, those transferred for **the purpose of fulfilling legal obligations, ensuring security, and fulfilling obligations arising from employment contracts and legislation**, and the places where these are transferred are listed below:

- a- General Directorate of Identity / Security / Judicial and Administrative Authorities as Public Institutions
- b- Philosophical belief, religion, sect and other beliefs / Judicial and Administrative Authorities as Public Institutions
- c- Communication / Judicial and Administrative Authorities as Public Institutions

ARTICLE 4: PERSONAL DATA COLLECTION METHODS AND LEGAL REASONS

The personal data of the customers are processed by filling the form in the physical or on the internet and/or by e-mail or verbally declaring their personal data. Legal reason for the collection and processing of personal data; for paragraphs 2/a, 2/c and 2/d of this clarification text are as follows:

- a- Law on the Protection of Personal Data No. 6698 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.

Legal reason for the collection and processing of personal data for article 2/d of this clarification text is below:

- b- Law No. 6698 on the Protection of Personal Data Art. 5/2-c / It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.

The legal reason for paragraph 2/b is the explicit consent.

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In the communication and customer transaction data category, explicit consent is also required for the execution of marketing processes.

ARTICLE 5: STORAGE PERIOD OF PERSONAL DATA

The storage periods of the personal data written in this clarification text according to the data categories are listed below and the personal data is annihilated at the end of the period.

- a- Identity / 20 years from the processing of the data
- b- Philosophical belief, religion, sect and other beliefs/20 years from the processing of data
- c- Communication / 20 years from the processing of data
- d- Customer transaction / 20 years from data processing

ARTICLE 6: RIGHTS OF THE RELEVANT PERSON

The natural person whose personal data is processed is defined as the relevant person and has the following rights regarding himself/herself by applying to the workplace:

- a- Learning whether personal data is processed or not
- b- If personal data has been processed, requesting information about it
- c- Learning the purpose of processing personal data and whether they are used in accordance with the purpose
- d- Knowing the third parties to whom personal data is transferred domestically or abroad
- e- Requesting correction of personal data if it is incomplete or incorrectly processed
- f- Request of deletion or annihilation of personal data
- g- Requesting notification of the transactions made pursuant to subparagraphs (e) and (f) to

third parties to whom personal data has been transferred

- h- Objecting to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems
- i- Requesting the compensation of the damage in case of loss due to unlawful processing of personal data

Sincerely yours,

**AVEC TURİZM OTELCİLİK İNŞAAT
TİCARET A.Ş.**

Notifier	
Name	
Surname	
Date	
Signature	