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EMPLOYEE CLARIFICATION TEXT

Pursuant to the Law No. 6698 on the Protection of Personal Data (hereinafter referred to as the "LAW"), your personal data may be transferred by Kayakapi Turizm Yatırım Ticaret A.Ş. (hereinafter referred to as the "COMPANY"), in its capacity as the data controller, to the data controller or the person authorized by the data controller or the person authorized by the data controller during the acquisition of personal data specified in Article 10 of the Law for the purpose of informing the employees regarding the procedures and principles regarding the processing of personal data of their employees;

- Identity of the data controller and its representative, if any,
- The purpose for which personal data will be processed,
- To whom and for what purpose the processed personal data may be transferred,
- The method and legal grounds for collecting personal data,
- Other rights listed in Article 11, are obliged to provide information about.

Your personal data will be recorded and stored within the scope of our commercial relations or within our business relationship with you, within the framework of the purpose that requires their processing and in connection with this purpose, in a limited and measured manner, by maintaining the accuracy and the most up-to-date version of the personal data as you have notified us or as notified to us, We hereby inform you that personal data will be kept, reorganized, shared with institutions authorized by law to request such personal data, and transferred to domestic or foreign third parties under the conditions stipulated by the LAW, transferred, classified and processed in other ways listed in the LAW.

The COMPANY pays special attention to the security of personal data and takes all necessary technical and administrative measures. During job applications to the COMPANY, during the signing of the employment contract and during the working period, personal information is requested from our employees in order to provide better service to our employees, to fulfill our legal obligations, to improve communication with our employees, to understand their needs and interests.

Your personal data in line with the principles listed in Article 4 of the KVKK Law;

- In accordance with the law and good faith,
- Accurate and up to date when needed,
- For specific, explicit and legitimate purposes
- In connection with, limited and proportionate to the purpose for which they are processed,
- It will be processed to be kept for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

According to the Law, any data that can be associated with a real person, which is stored electronically or in printed form, specified in the list titled "Your Personal Data Processed" below, is defined as "Personal Data". Your personal data may be collected verbally, in writing or electronically by our Company or real or legal persons who process data on behalf of our

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Company, based on different legal grounds, including but not limited to the website, e-mail, mobile communication, mobile applications, application and membership forms, various contracts.

Personal data may be shared with the relevant institutions and organizations if required by law, and are processed in accordance with the law and good faith, accurately and up-to-date when necessary, for specific, explicit and legitimate purposes, in connection with the purpose for which they are processed, within the framework of the principles of being limited and proportionate.

As a company, all personal data stored in the employee's personnel file or electronically, fulfillment of our obligations to our employees, support of recruitment research, proof of work, determination of working hours and starting and ending times of daily working hours, absenteeism control, supervision of payroll records, recording information regarding wages and wages, For purposes such as making the necessary notifications to the Social Security Institution and other institutions, implementing occupational health and safety legislation, fulfilling the obligations arising from the laws, determining the working conditions, as long as the employment contract continues, but for a certain period of time following the termination of the employment contract, it is kept in an electronic or non-electronic form.

Personal files will be kept for 15 years following the termination of the employment contract by taking all necessary technical and administrative measures.

Your Processed Personal Data

Identity Data: Name, surname, date of birth, nationality (nationality), place of birth, gender, marital status, nationality, Turkish ID card information (Turkish ID number, serial number, wallet number, father's name, mother's name, place of birth, province, district, neighborhood, volume number, family sequence number, sequence number, household number, page number, registration number, place of issue, reason for issue, date of issue, previous surname), copy of identity card, passport (passport number), residence card, driver's license, other documents bearing identity information (lawyer identity card, etc.).

Contact Data: Telephone number, full address information, e-mail address, internal contact information (internal telephone number, corporate e-mail address)

Financial Data: Financial and salary details, payrolls, premium entitlements, premium amounts, file and debt information regarding enforcement proceedings, bank passbook, IBAN number, minimum living allowance information

Sensitive Personal Data: Ex-convict status/criminal record, disability status/definition/percentage, religion, health data, blood type, health reports, porter report, temporary or permanent incapacity report, on-the-job health report, chest X-ray, hearing test, eye test, liver enzyme scan, Hepatitis tests, employment and periodic examination forms signed by the workplace physician, drug test, pregnancy status, pregnancy report, health and maternity leave information, union, association/foundation memberships

Education Data: Educational attainment, certificates and diplomas, foreign language skills, education and skills, curriculum vitae, courses and seminars attended

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Audiovisual Data: Photographs, voice recordings, camera recordings (video footage such as birthday celebrations, etc.) of a real person

Employee Performance and Career Development Data: Training and skills, information on which training received on which date, signed attendance form, monthly performance evaluation and target realization status, activity information, probationary period evaluation form

Family and Relative Data: Marriage certificate, name, surname, T.R. Identity Number, gender, date of birth, height, weight, position, name, surname, telephone number and open address of relatives who can be reached in case of emergency

Work Data: Registration number, position name, department and unit, title, last date of employment, dates of entry and exit, insurance entry/pension allocation number, social security registration number, flexible working hours, travel status, total monthly overtime, severance pay base date, severance pay additional days

Leave Data: Leave seniority base date, leave seniority additional days, leave group, departure/return date, number of days used, reason for leave, address/phone to be on leave, excuse leave information,

Other: Military service deferment, shoe size, clothing size, height, weight, vehicle license plate number, vehicle km data, internship status, shuttle service ridden, bus stops ridden, employee internet access logs, entry-exit logs, employee daily activity data, vehicle GPS tracking system records, personal protective embezzlement data

Human resources payroll and salary processes:

Your personal data may be used to create your personnel file (all documents included in the employment documents list), to carry out employment and dismissal processes, to make wage calculations, to fulfill legal obligations before institutions such as SSI, İŞKUR, Police Department, Gendarmerie, to follow up annual leave and excuse leaves, to carry out all Human Resources processes, to follow up legal processes such as lawsuits, execution, etc., to make work accident notifications, to follow up required by occupational health and safety legislation, to fulfill court decisions, to store other information stipulated by legislation, relevant regulatory bodies and other authorities. To follow up legal processes such as lawsuits, executions, etc., to make notifications of occupational accidents, to carry out the follow-up required by occupational health and safety legislation, to fulfill court decisions, to comply with other information storage, reporting and information obligations stipulated by legislation, relevant regulatory bodies and other authorities.

Attendance Control System (Personnel Attendance Control System) for Entry - Exit tracking:

The system works with face recognition system registration. If the face recognition system fails to recognize the personnel, the relevant personnel can be tracked in and out by writing a report explaining the situation in the Human Resources Department.

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In addition, the backup of the facial recognition system is carried out by the IT Department. This system is used to ensure that entrances and exits are made from a single location and to identify who is inside the building in case of unusual emergencies such as fire, etc.

Recording schedules showing the start and end times of work are available in the accounting department to enable the implementation and monitoring of free time and equalization. Equalization and overtime calculations are based on shift start and end times, not on entry and exit times.

(Uniform wearing, shift preparation, meal and rest periods are excluded in these calculations).

Education and career planning:

In order to identify career planning and training needs, personal information such as educational status, certificates held, and information on previous training is kept in your personnel file.

Camera surveillance system:

Cameras are installed in various locations of the Company (including personnel lodging). The cameras are used for the general security of employees, prospective employees and customers, and at the same time, the workplace is monitored on a 24/7 basis in order to provide emergency intervention in case of any accident, etc. in terms of occupational health and safety. Additional cameras can be used if necessary.


Company phone and company line:

In the event that a company phone and company line is provided, a line delivery and phone delivery report will be issued. Upon termination of the employment contract, written messages may be seen by us during the formatting process to be performed on the returned line and telephone machine. In this context, written messages can be examined by us. Care should be taken not to make personal, private and confidential correspondence with the company phone.

Controlling the company mailbox during the continuation and upon termination of the employment contract, monitoring internet traffic and keeping internet login logs:

Following the termination of the employment contract; the passwords of the electronic devices (computer, telephone, etc.) used by the personnel who leave the job are changed by the IT Department on the date the employment contract ends. The mailbox will remain active for 2 (two) months and incoming mails will be monitored by the IT Department and the relevant department manager in order to ensure that the customer and all parties with whom the business relationship is established are not negatively affected and the service provision can continue uninterrupted. Past dated e-mails, together with their attachments, may be opened for the purpose of conducting business.

Mail and internet traffic may be audited by the IT Department at any time and necessary restrictions may be imposed at any time for the control of inappropriate acts such as illegal copying, conducting business, business research, unauthorized software installation and use,

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participation in online communities, chat rooms, forums for entertainment purposes, mass e-mailing, access to music sites, detection of sites that may be infected with viruses, access to sites with inappropriate content contrary to general morality, customs and traditions, harassment, gambling, betting, etc. The logs of the websites accessed within the framework of Company rules and relevant laws are kept by the IT Department. The Company management may restrict access to websites that it deems inappropriate for reasons such as not exceeding the server capacity due to unnecessary mails and the danger of viruses.

In this context, personal, private and confidential correspondence and documents related to you should not be made from company computers.

Occasions such as birthdays, marriage, having a child:

In order to be with our employees on their happy days such as birthdays, marriages, having children, etc., and on their sad days such as accidents and funerals, announcements can be made to the company by mail on such days and occasions, as well as on the personnel bulletin boards.

Blood type sharing:

In the event that our employees themselves or their relatives need blood, the name, surname, telephone number and blood type information of our employees are notified to all company employees via mail or text message or on the bulletin boards within the company in order to ensure that the need for blood can be met quickly.

Reference checks in case of hiring and termination:

Our company will be able to exchange information with the person(s) for reference control in order to obtain information about the business ethics of your references that you have reported during your job application and during the job trial period. This will be valid within the 2 (two) month trial period. Again, in the event that your employment contract is terminated, upon your application to a new workplace, if our company is contacted for reference control, information is exchanged with the person / persons who call for reference about our personnel who left the job. If you do not have permission for reference checks, we must be informed during the termination of employment.

Use of video and audio recordings of the employee for the promotion of the hotel:

We use internal and external communication resources to promote our hotel and services. We promote our services for organizations such as congresses, weddings, meetings, etc. Videos or pictures of the relevant services are taken. These visuals are used in our company's social media accounts and trainings. It may be necessary to use the voice or image of our relevant personnel in these promotions, limited to the promotion of our services.

Vehicle Tracking System:

Company vehicles are procured through service procurement or ownership. Entry-exit information of the vehicles, vehicle license plate, vehicle mileage and driver information are recorded, tracked and reported at the security gate and personnel gate. The purpose here is not to have information about the private life of the personnel, but to intervene urgently in

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case of any malfunction of the vehicles, etc., and to monitor fuel, etc. This is purely related to the security of the vehicles.

Organizations such as friendly employee of the month, sweepstakes, etc:

In various departments of our company, friendly employee of the month is selected and those selected are announced on the employee bulletin boards with their name, surname, department and real person photo. In addition, in organizations such as proposals, suggestions, contests, etc., the winners can be announced with their name, surname, department and real person photograph.

Sharing your personal data with domestic third parties:

For your safety and for our Company to fulfill its obligations under the law, your personal data may be processed in accordance with the Labor Law, Occupational Health and Safety Law, Social Insurance and General Health Insurance Law, Law on Regulation of Publications on the Internet and Combating Crimes Committed through These Publications, Turkish Commercial Code, Personal Data Protection Law No. 6698, To the extent permitted and required by the provisions of the Law on Identity Notification and other legislation, including but not limited to the Law on Identity Notification, it may be shared with public legal entities such as the relevant institutions or organizations, Personal Data Protection Authority, Ministry of Finance, Ministry of Customs and Trade, Ministry of Labor and Social Security, Turkish Employment Agency (İş-Kur), Information Technologies and Communication Authority. For example, personal data of employees are shared with the Social Security Institution in order to pay employee and employer premiums.

Sharing your personal data with our business partners:

We use the ETA Accounting program Payroll Module and "Personnel Monthly Scorecard" for the execution of Human Resources processes. In case of any need for support, the support staff of the relevant company can connect to the programs and intervene on-site or remotely. In this context, inevitably, your personal information in the payroll program can be observed by the relevant support personnel. We have a confidentiality agreement with the company in question for the protection of your personal data.

Sharing your personal and sensitive personal data in terms of Occupational Health and Safety Legislation:

Your personal and sensitive personal data may be shared with our workplace physician during the recruitment process and for periodic health checks.

Sharing with company lawyers:

In case it is necessary following the continuation or termination of the employment contract, your personal data may be shared with our company lawyers, provided that it is limited to the purpose of the relevant lawsuit, in cases such as any lawsuit, etc.

Information technologies (IT) Sharing your personal data within the scope of support and archiving:

We do not receive backup services from third companies. If necessary, if backup and support services are received from third companies in terms of information technologies, personal

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data stored in electronic media may be observed by backup and support teams, but confidentiality agreements will be made with the companies in question.

Information technologies (IT) sharing within the scope of Support Services:

From time to time, there may be malfunctions in computers and our IT Department needs to intervene. It should be taken into consideration that personal files or Outlook correspondence may be seen within the scope of this intervention. For this reason, we kindly request you to pay attention not to make personal, private and confidential correspondence from company computers and not to keep such files.

In addition, in order to ensure uninterrupted operations, we would like to point out that in case of data loss, backups are always made by our IT Department in order to restore the lost data.

Sharing your personal data in organizations such as travel, training, meeting participation, etc:


In all organizations for business purposes such as organizations made by us during business travel, training, company meetings, etc., your personal data limited to serve the purpose may be shared with third parties. Example: Transferring information such as name-surname, telephone, postal address to the printing house during business card printing. Transferring information such as TC. no, name-surname, telephone number to the agency for domestic or international business travel ticketing services.

Sharing your personal data with department managers:

During and after recruitment, your personnel file is shared with your department managers for the sole purpose of getting to know the personnel and obtaining information about their performance, and after the process, your personnel file is taken back and kept in the cabinets.

According to Article 11 of the Law, you have the following rights:

1. Learn whether personal data is being processed,
2. Request information if personal data has been processed,
3. Learn the purpose of personal data and whether they are used for their intended purpose,
4. To know the third parties to whom personal data are transferred domestically or abroad,
5. To request correction of personal data in case of incomplete or incorrect processing,
6. Request deletion or destruction of personal data, (Please request a form from the Accounting Department for the request)
7. To request notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom personal data are transferred,
8. To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data only through automated systems,

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9. In case of damage due to the processing of personal data in violation of the Law, to demand the compensation of the damage,

Your requests in your application will be finalized free of charge within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost for the Company, the fee in the tariff determined by the Personal Data Protection Board in the Communiqué on the Procedures and Principles of Application to the Data Controller may be charged.

In matters related to the processing of your personal data, you must submit your application to our Company by filling out the application form on the Company's website, in writing or by using your registered electronic mail (KEP) address, secure electronic signature, mobile signature or your e-mail address that you have previously notified us and is included in our records. Depending on the nature of your request and your application method, the Company may request additional verifications (such as sending a message to your registered phone, calling you) in order to determine whether the application belongs to you and thus protect your rights. For example, if you apply through your e-mail address registered with the Company, we may contact you using another communication method registered with the Company and request confirmation of whether the application belongs to you.

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