## **Privacy Policy**

Cunda Callisto Hotel & Spa will be referred to as CALLISTO. CALLISTO has the policy of ensuring the privacy of the information you have shared during your visit. This "Privacy Policy" is intended to inform you about the terms and conditions for the use of personal data that is shared by the website users/visitors ("Data Subject") with the Company during the use of <a href="www.cundacallistohotel.com">www.cundacallistohotel.com</a> ("Website") that is operated by Cunda Callisto Hotel & Spa ("Company") or produced by the Company during Website use by the Data Subject. The service offered by CALLISTO will be referred to as "Service".

### WHAT IS PERSONAL DATA AND DATA PROCESSING?

Within the framework of the "Privacy Policy", "Personal Data" refers to your personal information regarding your identity and to any information that can be related to you, such as name, surname, TR Identity Number, address and telephone number, occupation, IP address, bank account information; "Private Personal Data", which is a special type of personal data, refers to information on race, ethnic origin, political view, philosophical belief, religion, sect or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and sensitive information such as your biometric and genetic data. This "Privacy Policy" covers both "Personal Data" and "Private Personal Data".

The processing of Personal Data refers to any action performed on the data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, by completely or partially automated means or non-automated means provided that it is part of any data recording system.

## **SCOPE OF PRIVACY POLICY**

As part of the service offered, CALLISTO may collect, store and transfer the personal information belonging to you in line with this "Privacy Policy". Such personal data processing activities shall be carried out in accordance with the Law on the Protection of Personal Data No. 6698 ("LPPD").

Our site contains links to third-party websites and your data may be transferred to third parties. This "Privacy Policy" does not reflect the privacy practices of the third parties to whom information is transferred, and CALLISTO assumes no responsibility for their privacy policies and/or personal data processing activities. This "Privacy Policy" shall not apply to the information collected by the applications beyond CALLISTO 's control, third parties' websites and platforms, the information collected by third parties through the links on CALLISTO 's website or by the headlines, campaigns and other advertisement or promotions on the third parties' websites which CALLISTO sponsors and/or participates. CALLISTO is not responsible for the transactions carried out with respect to the personal data that third parties collect, store and use through their website. If you provide personal information and/or use/visit these sites, the Privacy Policy and the terms of use of those sites apply.

# WHICH PERSONAL DATA OF YOURS ARE PROCESSED?

Some personal information is processed by the Company within the scope of the Services provided on the Site. These data may include: Your identity information, your contact details, user/customer transaction information

(information about your booking, your stay at the hotel and your visit, product or service purchases, and so on), your payment information, information of those who accommodate with you, your marketing and communication preferences, your IP address, pages viewed by you on our website; in case you visit our website via your mobile device, data and specifications describing your mobile device, as well as any other data that you explicitly select and approve to be disclosed to us or that we can obtain from third parties subject to your explicit consent.

In addition, cookies are used on the Site in order to improve the user experience, to ensure the efficient operation of the website, and to monitor statistical data. Some of the personal data mentioned above can be obtained using cookies, and users are deemed to have accepted the use of these cookies by using the Site. You can review our <u>Callisto Hotel Cookie Policy</u> to learn more about the function of cookies, the type of cookies used, the intended use, data transfers to third parties, and how to change your cookie preferences.

The data irrevocably anonymized shall not be regarded as personal data in accordance with the LPPD, and processing such data will not be subject to these Privacy Policy provisions.

### FOR WHAT PURPOSES ARE YOUR PERSONAL DATA PROCESSED?

Your personal data are processed to provide you with the services that you require from CALLISTO in the best way possible; to meet your requests and expectations about the products and services offered to you; to provide our customers the desired level of hospitality and personal experience; our business units to carry on necessary planning, evaluation and work for our customers to benefit from our products and services; to provide confirmations for correspondence, notification and bookings related to our hotel and accommodation services; to offer products and services tailored to people's tastes, usage habits and needs; to follow up and evaluate requests, suggestions and complaints; to manage guest satisfaction and implement planning, statistics and satisfaction evaluations in this context; to determine and implement commercial, legal and business strategies; to provide legal, technical and commercial/business security of the Company and for persons who have business relations with the Company; and to carry out business and commercial relations.

Your personal data may be further processed to provide better and more reliable products and to perform quality assessment and improvement services for maintaining sustainability, to allow third parties, in their capacity as service providers, to fulfill technical, logistic and other similar functions on behalf of us.

Moreover, your personal data may be used for advertising and marketing activities related to our products and services provided that you have given explicit consent, and to inform you about our promotions, campaigns, offers, bulletins, events and similar issues and other marketing communications.

We process your personal data that we collect in line with the purposes mentioned above, based on one or more of the following legal reasons:

- -Your explicit consent,
- -If the applicable laws and regulations of the Republic of Turkey dictates the processing necessary,
- -In case it is mandatory to preserve the life or bodily integrity of you or someone else while you are physically incapacitated and therefore unable to give consent,

- -In case it is required for the performance of the contract we have concluded with you or your company,
- -When it is necessary to process your personal data in order to fulfill our legal obligations,
- -If you publicized your personal data,
- -If it is required for the exercise or protection of our legal or contractual rights as a company,
- -In case the processing of your personal data is necessary for our legitimate interests, without damaging your fundamental rights and freedoms.
- -We protect all your personal data that we process in accordance with the deadlines set by the LPPD and other legislation, and in all cases, taking all necessary administrative and technical measures, as long as the abovementioned legitimate reasons remain valid.

### TO WHOM ARE YOUR PERSONAL DATA DISCLOSED?

The Company may transfer the personal data belonging to the Data Subject to third parties in Turkey and abroad who provide services to our Company strictly for the purpose of fulfilling the objectives set forth in this Privacy Policy.

The Company may disclose your personal data to the outsourcing service providers including the bulk messaging services sending SMS, e-mail and bulletins, law firms, authorized institutions and organizations, research companies, service providers and consulting firms, where we receive support for storage, archiving and information technology support (server, hosting, software, cloud computing, etc.), in order to develop the Data Subject experience (including improvement and customization), to ensure the security of the Data Subject, to detect fraudulent or unauthorized use, to make operational assessment, debugging site services errors and to perform any of the purposes stated in this Privacy Policy.

In addition, some of the personal data specified in this Privacy Policy and obtained by CALLISTO may be shared with advertisers, together with the information of other users, to ensure that the ads can be adapted to the target audience. In this context, personal information is not disclosed in any way, and only anoymized data is processed as a group to analyze user trends, obtain statistics and perform segmentation.

CALLISTO may disclose your Personal Data for any of the following reasons: (i) in accordance with legal requirements; (ii) to comply with the administrative and judicial proceedings and upon the requests of the administrative or judicial authorities; (iii) to execute the Terms of Service; (iv) to protect its activities; (v) to take reasonable measures or to limit the potential harm for the sake of protecting rights, confidentiality, security or property of CALLISTO, you or third parties.

All information shared by users on the Site can only be accessed and updated by the users themselves. It is not possible for any third party, except CALLISTO, to access and modify this information without your consent.

When you perform a transaction on the Site, you agree that your financial information is necessarily shared with third parties (banks, credit card companies, etc.) in order for your transaction to be carried out. The information to be shared includes all the necessary financial information, including credit card number, expiry date, and CVV2. This type of information is not processed or stored by CALLISTO. However, a summary of the related transaction may be processed by CALLISTO without any credit card and/or bank account details.

#### WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

Following is a quick list of your rights regarding your data processed by the Company:

- (1) To learn whether your personal data are processed or not,
- (2) To request further information if your personal data are processed,
- (3) To learn the purposes of your data processing and whether your data are used for the intended purposes,
- (4) To know the third parties to whom your personal data are transferred domestically or abroad,
- (5) To request correction of any incomplete or inaccurate data,
- (6) In case your personal data are corrected, deleted or destroyed, to request notification of such operations to third parties to whom your personal data have been transferred,
- (7) To request the deletion or destruction of your personal data if the reasons that require the processing of your personal data are no longer valid or your personal data are out of date,
- (8) To object to any unfavorable consequence occurred as a result of the automatic analysis of your data,
- (9) To request compensation for the damages arising out of the unlawful processing of your personal data.

You can send your requests regarding your rights above to info@callistohotel.com

Your requests will be responded to as soon as possible and free of charge, no later than 30 days after we receive it depending on the nature of the request.

We may accept any requests directed to the Company or deny the request with justification, and disclose our decision in written or electronic form to the applicant. If the request is accepted, as the Company, we are obliged to fulfill the request immediately. In the event that your request is rejected by the Company, you are not satisfied with the response given by the Company, or you are not responded to; you can file a complaint to the Personal Data Protection Board within 30 days after the date of notification or if you are not responded to, within 30 days beginning from the end of the 30-day period.

In addition, if you do not want to receive any commercial electronic communications related to the Service provided by CALLISTO, you may also exercise your right to unsubscribe by sending a notification to <a href="mailto:info@callistohotel.com">info@callistohotel.com</a>, free of charge.

## **HOW LONG IS YOUR PERSONAL DATA STORED?**

CALLISTO shall store your Personal Data for a period of time as defined in this Privacy Policy, unless a longer period of storage is required or permitted as a matter of the related legislation.

In addition, in the event of any disputes that may arise between the Data Subject and the Company, the Company shall be able to store the personal data during the period of limitation specified in accordance with the applicable legislation, limited for the purpose of the necessary legal defenses.

## **PROVIDING DATA SAFETY**

CALLISTO is committed to taking all necessary measures and showing due diligence, to keep personal information strictly confidential, to consider it a confidentiality obligation and to protect the privacy, security and integrity of personal data in order to provide necessary and reasonable protections, not to cause any loss, misuse, unlawful use or alteration of such data, and to prevent all or any part of personal information from being disclosed publicly, or from unauthorized use or disclosure by a third party, provided that legal liabilities are reserved.

In the event that a link is made to other applications through the Site, the Company shall not be responsible for the privacy policies and contents of those applications.

## **POLICY UPDATE**

CALLISTO may change the contents of this Privacy Policy at any time to keep the privacy and data protection principles up-to-date and to comply with the applicable legislation. Any changes to the Privacy Policy will be shared on the CALLISTO website. We therefore recommend that you review the Privacy Policy periodically. The amended provisions of the Privacy Policy by CALLISTO shall to be effective on the date of publication on the Site. If you continue to use the Site after the policy has been amended, it means that you accept the changes.

## **CONTACT US**

You may send your questions, comments or complaints regarding the interpretation or implementation of this Policy to the contact addresses below.

# **Contact information:**

Cunda Callisto Hotel & Spa ("Company")

**E-mail:** info@callistohotel.com

Address: Mithatpaşa Mah. Mevlana Cad. No:68 Ayvalık / Balıkesir

**Telephone:** +902663856060