

CUSTOMER PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

Data Controller: HOSU KONAKLAMA OTELCİLİK VE RESTORAN İŞLETMECİLİĞİ ANONİM ŞİRKETİ

Levent Mah. Fulyalı Sk. No: 5 İç Kapı No: 1, Beşiktaş, İstanbul, Türkiye

As HOSU KONAKLAMA OTELCİLİK VE RESTORAN İŞLETMECİLİĞİ ANONİM ŞİRKETİ ("Hovagimyan"), which provides accommodation services under the Hovagimyan Hotel and Suites brand through <https://www.hovagimyan.com/>, we have prepared this privacy notice to inform our customers about the processing, storage and transfer of their personal data within the scope of our activities arising from Law No. 6698 on the Protection of Personal Data ("KVKK") and the relevant legislation and legal regulations.

Which Personal Data Do We Process and for What Purposes?

In connection with our operations and employment-related purposes, we collect the following categories of personal data from our customers:

1. Identity Data

Personal data processed	Purposes of processing
First name, surname, place of birth, date of birth, gender, passport number, copy of passport, Turkish ID number, national identity card / ID copy, driving licence number, signature, vehicle registration number and nationality.	Ensuring that activities are conducted in compliance with legislation; carrying out communications; conducting and supervising business activities; managing the sale of goods/services; managing customer relationship processes; carrying out customer-satisfaction activities; record-keeping and archiving; tracking requests and complaints; providing information to authorised persons, institutions and organisations; conducting goods/services production and operational processes; providing after-sales support services; conducting finance and accounting activities; handling and conducting legal affairs; managing contractual processes; conducting the marketing of products/services; and ensuring the security of the data controller's operations.

Legal grounds for processing: The personal data listed above are processed by Hovagimyan for the stated purposes on the legal grounds set out in Article 5 of the KVKK and the relevant legislation, as applicable: processing is expressly provided for by law; processing is necessary for the data controller to fulfil its legal obligations; processing is necessary for the establishment or performance of a contract, provided that it directly relates to the parties to that contract; processing is necessary for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject.

Methods of collection: Your personal data listed above are collected through paper and electronic forms, contracts/undertakings, email and forms on the website.

2. Contact Data

Personal data processed	Purposes of processing
Email address, mobile telephone number, contact address and country.	Managing the sale of goods/services; managing customer relationship processes; carrying out communications; conducting and supervising business activities; managing contractual processes; conducting goods/services production and operational processes; managing risks; conducting logistics activities; tracking requests and complaints; ensuring business continuity; carrying out customer-satisfaction activities; managing emergency situations; conducting audit/ethics activities; receiving and evaluating suggestions to improve business processes; and managing advertising, campaign and promotion processes.

Legal grounds for processing: The personal data listed above are processed by Hovagimyan for the stated purposes on the legal grounds set out in Article 5 of the KVKK and the relevant legislation, as applicable: processing is expressly provided for by law; processing is necessary for the data controller to fulfil its legal obligations; processing is necessary for the establishment or performance of a contract, provided that it directly relates to the parties to that contract; processing is necessary for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject.

Methods of collection: Your personal data listed above are collected through paper and electronic forms, social media, contracts/undertakings, email and face-to-face meetings.

3. Customer Transaction Data

Personal data processed	Purposes of processing
Room number, arrival date, requests/complaints and room preferences.	Conducting and supervising business activities; managing the sale of goods/services; carrying out communications; tracking requests and complaints; carrying out customer-satisfaction activities; managing customer relationship processes; ensuring business continuity; and managing advertising, campaign and promotion processes.

Legal grounds for processing: The personal data listed above are processed by Hovagimyan for the stated purposes on the legal grounds set out in Article 5 of the KVKK and the relevant legislation, as applicable: processing is necessary for the establishment or performance of a contract, provided that it directly relates to the parties to that contract; processing is necessary for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject.

Methods of collection: Your personal data listed above are collected through paper forms, contracts and forms on the website.

4. Financial Data

Personal data processed	Purposes of processing
Bank account details and credit card number.	Managing contractual processes; conducting goods/services production and operational processes; managing the sale of goods/services; carrying out finance and accounting activities; and handling and conducting legal affairs.

Legal grounds for processing: The personal data listed above are processed by Hovagimyan for the stated purposes on the legal grounds set out in Article 5 of the KVKK and the relevant legislation, as applicable: processing

is expressly provided for by law; processing is necessary for the data controller to fulfil its legal obligations; processing is necessary for the establishment or performance of a contract, provided that it directly relates to the parties to that contract; processing is expressly provided for by law.

Methods of collection: Your personal data listed above are collected through contracts/undertakings and forms on the website.

5. Transaction Security Data

Personal data processed	Purposes of processing
Website login/logout information, internal IP address and external IP address.	Conducting information-security processes; conducting and supervising business activities; managing access authorisations; ensuring that activities comply with legislation; and providing information to authorised persons, institutions and organisations.

Legal grounds for processing: The personal data listed above are processed by Hovagimyan for the stated purposes on the legal grounds set out in Article 5 of the KVKK and the relevant legislation, as applicable: processing is expressly provided for by law; processing is necessary for the data controller to fulfil its legal obligations.

Methods of collection: Your personal data listed above are collected through electronic systems.

6. Physical Premises Security Records

Personal data processed	Purposes of processing
CCTV recording information.	Ensuring physical premises security; conducting occupational health and safety activities; maintaining records and archives; and providing information to authorised persons, institutions and organisations.

Legal grounds for processing: The personal data listed above are processed by Hovagimyan for the stated purposes on the legal grounds set out in Article 5 of the KVKK and the relevant legislation, as applicable: processing is necessary for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject.

Methods of collection: Your personal data listed above are collected through security cameras located at the premises.

To Whom and for What Purposes May Your Personal Data Be Transferred Within Türkiye?

Your personal data may be transferred:

- to authorised public institutions and organisations in Türkiye, to the extent required by law, for the purposes of ensuring that activities comply with legislation, providing information to authorised persons, institutions and organisations, fulfilling employment-contractual and statutory obligations relating to employees, and conducting occupational health and safety activities;
- to natural persons or private-law legal entities in Türkiye, to the extent required by law, for the purposes of ensuring that activities comply with legislation and providing information to authorised persons, institutions and organisations; and
- to third parties with whom we have business partnerships, for the purposes specified in the agreements concluded between us.

Is Your Personal Data Transferred Abroad?

Where personal data are transferred to third parties abroad, Hovagimyan may transfer your personal data without your explicit consent if at least one of the data-processing conditions set out in Articles 5 and 6 of the KVKK and explained in this Policy applies, and provided that the fundamental principles governing data processing are observed. Where the legal grounds stated above apply and for the purposes specified, we may transfer the personal data we collect to our business partners located in Türkiye and/or abroad that provide services to support our business activities and processes; our cooperating agencies and business contacts that provide online hotel reservation services; our suppliers; third-party service providers providing services within the premises; and service providers located abroad that process personal data on our behalf and provide storage, archiving and information technology support, subject to compliance with the provisions of the KVKK.

What Are Your Rights as a Data Subject?

Under the KVKK and the relevant legislation, you have the following rights in relation to your personal data:

- to learn whether your personal data are being processed;
- to request information if your personal data have been processed;
- to learn the purpose of processing your personal data and whether they are used in accordance with that purpose;
- to know the third parties in Türkiye or abroad to whom your personal data have been transferred;
- to request the correction of your personal data if they have been processed incompletely or inaccurately;
- to request the erasure or destruction of your personal data, subject to the conditions stipulated by the KVKK;
- where you request the correction of incomplete or inaccurate data, or the erasure or destruction of your personal data, to request that these actions be notified to third parties to whom your personal data have been transferred; and
- to request compensation for damage if you suffer loss as a result of unlawful processing of your personal data.

How Can You Exercise Your Rights?

You may submit your applications and requests concerning your personal data, if you wish, by using the Data Subject Application Form:

- by sending it, bearing a wet-ink signature and accompanied by a copy of your identity document, to Kemankeş Karamustafa Paşa Mah. Kemankeş Cd. No: 45, Karaköy-Beyoğlu, İstanbul, Türkiye;
- by applying to Hovagimyan in person with a valid identity document; or
- by emailing info@hovagimyan.com from the email address previously notified to Hovagimyan by the data subject and registered in our systems.

Requests submitted by unauthorised third parties on behalf of another person will not be considered.

How Long Will It Take to Respond to Your Requests Regarding the Processing of Your Personal Data?

Your requests concerning your rights in relation to your personal data will be assessed and answered within no later than 30 days from the date on which they are received. If your application is rejected, the reasons for rejection will be sent to the address you provided, by one of the methods selected in the Data Subject Application Form, including email or post.

Translator's note: This is an English translation of the Turkish document provided, prepared for clarity and legal-style terminology. It is not a legal opinion or certification. The source text contains apparent duplication/inconsistency in the listed legal grounds for financial data and may require review by Turkish privacy counsel before publication. The source also includes an editorial note recommending that the company logo be added.