



ATU TOURISM MANAGEMENT CORPORATION POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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1. PART 1- INTRODUCTION

1.1. INTRODUCTION

The protection of personal data is among the most important priorities of ATU Tourism Management Corporation (“**Company**”), and our Company makes the utmost effort to comply with all applicable legislation in this regard. The most important pillar of this issue is the ATU Tourism Management Corporation Personal Data Protection and Processing Policy (“**Policy**”).

Within the framework of this Policy, the principles adopted in the conduct of personal data processing activities carried out by our Company and the basic principles adopted in terms of compliance of our Company's data processing activities with the regulations in the Law on the Protection of Personal Data No. 6698 (“**Law**”) are explained, and In this way, our company provides the necessary transparency by informing personal data owners. With the full consciousness of our responsibility in this context, your personal data is processed and protected under this policy.

1.2. SCOPE

This Policy concerns all personal data of persons other than our Company's employees, which are processed automatically or by non-automatic means, provided that they are part of any data recording system.

It is possible to reach detailed information about the personal data owners in question from the APPENDIX-1 (“**Appendix 1- Personal Data Owners**”) document of this Policy.

The activities carried out by our Company regarding the protection of the personal data of our employees are managed under the ATU Tourism Management Corporation Employee Personal Data Protection and Processing Policy, which was written in parallel with the principles in this Policy.

This Policy is a guide for other ATU Tourism Management Corporation subsidiaries not specified in the scope, and is a guide for ATU Tourism Management Corporation subsidiaries established abroad, and will be issued in accordance with the legal regulations of the country where these companies are located.

1.3. DEFINITIONS

Explicit Consent: It is the limited consent given for the purpose of data processing, based on information and freely expressed, on a specific subject.

Anonymization: It is the rendering of personal data that cannot be associated with an identified or identifiable natural person in any way, even by matching with other data.

Employee(s): Company employees.

Confidential Information: In case of disclosure; It is the information of critical importance that may harm the company financially, disrupt its service, affect the relations with customers and/or suppliers, reduce employee motivation and productivity, undermine reputation/brand value, and cause sanctions against laws/regulations.

Confidential Information may take place on paper or electronic media (Company servers, Computer, USB Memory stick, Portable External Disk, Tablet Computer, Smartphone, CD, DVD, etc.)

Human Resources Departments: Human Resources Department of the Company.

Personal Data(s): Any information relating to an identified or identifiable natural person.

Personal Data Owner: The natural person whose Personal Data is processed.
e.g.; customers, suppliers, employees, etc.

Processing of Personal Data: Provided that Personal Data is fully or partially automated or part of any data recording system, It is any operation performed on data such as obtaining by non-automatic means, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing its use.

PDPL Law: The Law on Protection of Personal Data No. 6698, dated March 24th, 2016, published in the Official Gazette dated 7th of April, 2016 and numbered 29677.

PDPL Responsibilities: Company employees who provide the necessary coordination within the Company within the scope of ensuring, maintaining and maintaining compliance with the legislation on the protection of Personal Data by the Company.

PDPL Committee: Committee: The Personal Data Protection Committee of the Company, which has the authority to make decisions and present it to the senior management in order to continuously manage and develop the KVK Compliance Program.

Sensitive Personal Data: Personal Data about the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, biometric and genetic data.

Policy: ATU Tourism Management Corporation Personal Data Protection and Processing Policy.

Company: ATU Tourism Management Corporation

Data Breaches: Incidents where there is justified suspicion about the illegal capture, collection, alteration, copying, distribution or use of personal data.

Data Controller: The Company that determines the purposes and means of processing Personal Data and manages the place where the data is kept systematically.

Senior Management: ATU Tourism Management Corporation Executive Committee Members and Board Members.

1.4. BASE

This Policy has been prepared for the protection and processing of personal data by taking into account all relevant local laws and regulations, internal and general policies and procedures in order to comply with the PDPL Law of the activities carried out by ATU Tourism Management Corporation, the relevant secondary legislation and the decisions of the PDPL Board.

2. PART 2 –ISSUES RELATING TO THE PROCESSING OF PERSONAL DATA

2.1 Processing of Personal Data in Compliance with the Principles Established in the Legislation

2.1.1. Processing in Compliance with Law and Honesty Rule

Personal data is processed in accordance with the general rule of trust and honesty, without harming the fundamental rights and freedoms of individuals. In this framework, personal data is processed to the extent and limited to the business activities of our Company.

2.1.2. Ensuring Personal Data Are Accurate and Up-to-Date When Necessary

Our company takes the necessary measures to ensure that personal data is accurate and up-to-date throughout the period of processing, and establishes the necessary mechanisms to ensure the accuracy and up to date of personal data for certain periods.

2.1.3. Data Processing for Specific, Explicit and Legitimate Purposes

Our company clearly reveals the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with its business activities.

2.1.4. Being Relevant to the Processing Purpose, Limited and Temperance

Our company collects personal data only in the quality and extent required by business activities and processes it limited to the determined purposes.

2.1.5. Retention for as Long as Required for the Purpose of Processing or Envisioned in the Relevant Legislation

Our company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company first determines whether a period is foreseen for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period necessary for the purpose for which they are processed. At the end of the specified storage periods, personal data is destroyed in accordance with the periodic destruction periods or the application of the data owner and with the determined destruction methods (deletion and / or destruction and / or anonymization).

2.2 PROCESSING CONDITIONS OF PERSONAL DATA

Explicit consent of the personal data owner is only one of the legal bases that enables the processing of personal data in accordance with the law, and in the presence of one of the conditions below, personal data is processed by our Company without seeking the explicit consent of the data owner.

Except for explicit consent, the basis of the personal data processing activity may be only one of the conditions stated below, or more than one condition may be the basis of the same personal data processing activity. In case the processed data is sensitive personal data, the conditions in the 2.3 title (“**Processing of Sensitive Personal Data**”) of this Policy and the provisions of the Policy on the Protection and Processing of Sensitive Personal Data will be applied.

2.2.1 Explicitly Envisioned in Laws

If it is expressly envisioned in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, the personal data of the data owner may be processed by our Company within the framework stipulated in the legislation.

2.2.2 Failure to Obtain the Explicit Consent of the Person Related to the Cause of Actual Impossibility

The personal data of the data owner can be processed if it is necessary to process the personal data of the person who is unable to express his or her consent due to actual impossibility or whose consent cannot be validated, in order to protect the life or bodily integrity of himself/herself or another person.

2.2.3 Direct Concern with the Conclusion or Performance of the Contract

Provided that it is directly related to the conclusion or performance of a contract to which the data owner is a party, this condition can be deemed to be fulfilled if the processing of personal data is necessary.

2.2.4 Fulfilling the Legal Obligation of the Company

If data processing is necessary for our company to fulfill its legal obligations, the personal data of the data owner can be processed.

2.2.5 Making Personal Data Public by the Personal Data Owner

If the data owner has made her/his personal data public, the relevant personal data can be processed for the purpose of making it public.

2.2.6 Mandatory Data Processing for the Establishment or Protection of a Right

If data processing is necessary for the establishment, exercise or protection of a right, the personal data of the data owner may be processed.

2.2.7 Obligatory Data Processing for the Legitimate Interest of Our Company

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner can be processed if data processing is necessary for the legitimate interests of our Company.

2.3 Processing of Sensitive Personal Data

Special importance is attached to sensitive personal data within the scope of the law, due to the risk of causing victimization or discrimination when processed unlawfully. These "Sensitive Personal Data" is about the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, biometric and genetic data.

Sensitive Personal Data is processed by our Company in accordance with the principles set forth in this Policy, by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

- (i) Sensitive Personal Data other than health and sexual life** can be processed without the explicit consent of the data owner, provided that it is expressly stipulated in the law, in other words, there is a clear provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data owner will be obtained.

- (ii) **Sensitive personal data regarding health and sexual life** can be processed for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the express consent by persons under the obligation of keeping confidentiality or authorized institutions and organizations. Otherwise, the explicit consent of the data owner will be obtained.

2.4 Processed Personal Data Categories and Purposes of Processing

It is possible to access the personal data categories processed by our company within the framework of the purposes and conditions specified in this Policy in accordance with the Law and other relevant legislation provisions, and detailed information about these categories in the APPENDIX-2 ("**Personal Data Categories**") document of this Policy.

In accordance with the law and other relevant legislation, the personal data processing purposes of our Company within the scope of the personal data detailed in this Policy and the processing conditions of sensitive personal data are as follows:

1. Planning and/or fulfillment of our company's human resources policies and processes,
2. Planning and/or fulfillment of the legal and technical security activities of our company and the related persons who have a business relationship with our company,
3. Planning and/or fulfillment of the activities necessary for recommending and promoting the products and services offered by and/or on behalf of our Company to the relevant persons by customizing them according to the tastes, usage habits and needs of the persons concerned,
4. Carrying out the necessary studies and the relevant business processes in order to benefit the related persons from the products and / or services offered by and / or on behalf of our Company,
5. In order to realize the commercial and/or operational activities carried out by our company, conducting necessary work and related business processes by our relevant business units.
6. Planning and/or fulfillment of our company's commercial and/or business strategies.

It is possible to reach detailed information regarding the relevant personal data processing purposes from the APPENDIX-3 ("**Appendix 3- Personal Data Processing Purposes**") document of this Policy.

3. PART 3 – ISSUES RELATING TO THE TRANSFER OF PERSONAL DATA

Our company can transfer the personal data and sensitive personal data of the personal data owner to third parties by taking the necessary security measures in line with the personal data processing purposes in accordance with the law. In this direction, our company acts in accordance with the regulations stipulated in Articles 8 and 9 of the Law. Detailed information on this subject can be found in the APPENDIX 4 (“**APPENDIX 4-Third Persons To whom Personal Data Transferred by Our Company and Purposes of Transfer**”) document of this Policy.

3.1 Transfer of Personal Data

Even without the explicit consent of the personal data owner, in case one or more of the conditions stated below are present, personal data may be transferred to third parties by our Company with taking necessary care and taking all necessary security measures, including the prescribed methods of the Board.

- The relevant activities regarding the transfer of personal data are clearly stipulated in the law,
- The transfer of personal data by the Company is directly related to and necessary for the establishment or fulfillment of a contract,
- The transfer of personal data is compulsory for our Company to fulfill its legal obligations or for carrying out the business processes,
- Transferring personal data by our Company in a limited manner for the purpose of making it public, provided that the personal data has been made public by the data owner,
- The transfer of personal data by the Company is compulsory for the establishment, exercise or protection of the rights of the Company or the data owner or third parties,
- It is compulsory to carry out personal data transfer activities for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data owner,
- Being obligatory for the protection of life or physical integrity of herself/himself or another person, who is unable to express her/his consent due to actual impossibility or whose consent is not legally valid.

If personal data is to be transferred abroad, in addition to the conditions above, personal data shall be transferred by our company to foreign countries declared to have adequate protection by the Board (“**Foreign Country with Adequate Protection**”); or in the absence of adequate protection, it is transferred to foreign countries where the data controllers in Turkey and the relevant foreign country undertake an adequate protection in writing and where the Board has the permission (“**Foreign Country of Data Controller Undertaking Adequate Protection**”).

3.2 Transfer of Sensitive Personal Data

Sensitive personal data may be transferred by our Company in accordance with the principles set forth in this Policy, by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

- (i) **Sensitive personal data other than health and sexual life** may be transferred without the explicit consent of the data owner, provided that it is expressly stipulated in the law, in other words, there is a clear provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data owner will be obtained.
- (ii) **Sensitive personal data regarding health and sexual life** may be transferred, for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of persons by under the obligation of keeping confidentiality or authorized institutions and organizations. Otherwise, the explicit consent of the data owner will be obtained.

If sensitive personal data is to be transferred abroad, in addition to the above-mentioned conditions, sensitive personal data is transferred to Foreign Countries with Adequate Protection or to Foreign Countries Where Data Controller Undertakes Adequate Protection.

4. PART 4 – ENLIGHTEN OF PERSONAL DATA OWNER

Our company, in accordance with Article 10 of the Law and secondary legislation, informs the owners of personal data, as the data controller, about by whom and for what purposes their personal data is processed, for what purposes it is shared with whom, what methods it is collected, the legal reason and the rights of the data owners within the scope of the processing of their personal data.

5. PART 5- STORAGE AND DISPOSAL OF PERSONAL DATA

Our company keeps personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company first determines whether a period is foreseen for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period necessary for the purpose for which they are processed. At the end of the specified storage periods, personal data is destroyed in accordance with the periodic destruction periods or the application of the data owner and with the determined destruction methods (deletion and / or destruction and / or anonymization). The provisions of the Company's Personal Data Retention and Disposal Policy will be applied to this process.

6. PART 6- ISSUES RELATING TO THE PROTECTING OF PERSONAL DATA

6.1. Measures Taken for the Protection of Personal Data

In accordance with Article 12 of the Law, our company takes the necessary measures according to the qualification of the data to be protected in order to prevent the unlawful disclosure, access, transfer or security deficiencies that may occur in other ways. In this context, our Company takes administrative measures to ensure the required level of security in accordance with the guidelines published by the Personal Data Protection Board (“**Board**”), and carries out inspections or have them made.

In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in terms of special quality personal data, and necessary audits are provided within our Company.

6.2. Raising Awareness and Supervision on the Protection and Processing of Business Units Personal Data

Our company provides necessary trainings to business units in order to prevent illegal processing of personal data, illegal access to data, and to raise awareness about data protection.

Our company establishes the necessary systems to raise awareness of its current employees and newly recruited employees on the protection of personal data, and works with consultants if needed. In this direction, our Company evaluates the participation in the relevant trainings, seminars and information sessions, and organizes new trainings in parallel with the updating of the relevant legislation.

7. PART 7 – RIGHTS OF PERSONAL DATA OWNERS AND THE USE OF THESE RIGHTS

7.1 RIGHTS OF PERSONAL DATA OWNERS

Personal data owners have the following rights:

- 1) Finding out if personal data is processed,
- 2) Requesting information on personal data if processed,
- 3) Finding out the purpose of processing personal data and whether they are used in accordance with the purpose,
- 4) To know the third parties to whom personal data is transferred in the country or abroad,
- 5) In case of incomplete or incorrect processing of personal data, to request their correction and to notify the third parties to whom the personal data has been transferred,

- 6) Even though it has been processed in accordance with the provisions of the law and other relevant laws, in case the reasons for processing disappear, to request the destruction or destruction of the process and to notify the third parties to whom the personal data has been transferred,
- 7) Objecting to the emergence of a result against the person herself/himself by analyzing the processed data exclusively through automated systems,
- 8) Demanding the compensation of the damage in case of loss due to unlawful processing of personal data.

7.2 USE OF THE PERSONAL DATA OWNER'S RIGHTS

Personal data owners may submit their requests regarding their rights listed in part 7.1 ("**Rights of Personal Data Owner's**") to our Company through the methods determined by the Board. Accordingly, they will be able to benefit from the "Data Owner Application Form", which can be accessed at <https://atu.com.tr/tr/yasal/kisisel-verilerin-korunmasi/>. Apart from this, requests under the Law; It can also be transmitted to the Company in writing or by using a registered electronic mail (REM) address, secure electronic signature, mobile signature, or an electronic mail address previously notified to our Company and registered in our Company's system, or by means of a software or application developed for application purposes. Accordingly, the contact address where requests will be processed is kykk_iletisim@atu.com.tr.

7.3 OUR COMPANY'S RESPONSE TO APPLICATIONS

Our company takes the necessary administrative and technical measures to finalize the applications to be made by the personal data owner in accordance with the Law and secondary legislation.

In case the personal data owner submits his request regarding the rights in part 7.1 ("**Rights of Personal Data Owner**") to our Company in accordance with the procedure, our Company will conclude the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the qualification of the request. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

8. APPENDICES

APPENDIX-1 PERSONAL DATA OWNERS

PERSONAL DATA OWNER CATEGORY	EXPLANATION
Employee / Intern Candidate	: It means natural persons who applied for a job to our Company by any means or opened their CVs and related information to our Company's review.
Former Employee	: It means natural persons whose employment contract with our company was terminated for any reason (leaving the job, dismissal, retirement, etc.)
Customer	: It means natural persons who use, have used or applied for the purpose of using the products and services offered by our company, or whose application is under evaluation, or who are employees, officers or shareholders of natural or legal persons.
Potential Customer	: It means natural persons who are employees, officers or shareholders of natural or legal persons who have not requested or been interested in using our products and services and have been evaluated in accordance with the commercial practice and honesty rules that they may have.
Event Participant	: It means natural persons participating events, organizations and similar activities organized by our company.
Opinion / Complaint / Suggestion and Information Request Owners	: It means natural persons who convey their opinions/complaints/suggestions or information and other requests to our Company whether or not they have benefited from our Company's products and services.
Visitor	: It means natural persons who visit our Company's premises, websites or join our Company's guest internet network.
Campaign / Competition Participant	: It means natural persons who participate in campaigns or competitions organized by our company.
Relatives of Data Owners	: It means people who benefit from our company's products and/or services and/or family members and relatives of our employees.
Supplier Employee / Official / Shareholder	: It means natural persons who are shareholders, officials or employees of companies that provide goods and/or services to our Company, based on the current and/or possible future agreement with our Company.
Business Partner Employee / Official / Shareholder	: It means natural persons who are shareholders, officials or employees of companies with whom our company has business partnerships for purposes such as the sale, promotion and marketing of our company's products and services, after-sales support, and carrying out of joint customer loyalty programs.
Other Third Parties	: It means natural persons and other third parties who are included within the scope of this Policy and are not covered by the ATU Tourism Management Corporation Employee Personal Data Protection and Processing Policy.

APPENDIX-2 PERSONAL DATA CATEGORIES

PERSONAL DATA CATEGORY	EXPLANATION
Identity Information	: It refers to the data that contains information about the identity of the person. (Documents such as driving license, identity card and passport, which contain information such as Name-Surname, TR ID number, nationality information, mother's name-father's name, place of birth, date of birth, gender, and tax number, etc.)
Contact Information	: It means phone number, address, e-mail and similar contact information.
Financial Information	: It means personal data processed for information, documents and records showing all kinds of financial results created according to the type of legal relationship our company has established with the personal data owner, and data such as bank account number, IBAN number, credit card information, financial profile, asset data, and income information.
Customer Information	: It means the data obtained regarding our customers who benefit from our business management service during the realization of our commercial activities.
Customer Process Information	: It means information such as records for the use of our products and services, and information such as our customers' instructions and requests for the use of our products and services.
Process Security Information	: It means personal data (for example, log records) processed to ensure our technical, administrative, legal and commercial security while carrying out our commercial activities.
Legal Process and Compliance Information	: It means personal data processed within the scope of determination, follow-up and performance of our legal receivables and rights, and compliance with our legal obligations and our Company's policies.
Request/Complaint Management Information	: It means personal data regarding the received and evaluation of all kinds of requests and/or complaints directed to our company.
Visual and Audio Data	: It means the data of visual or audio quality such as Photo, video, etc.
Physical Location Security Information	: It means the personal data regarding the records and documents taken at the entrance to the physical location, during the stay in the physical location; such as camera records, visitor records.
Audit and Control Information	: It means personal data processed during internal or external audit activities within the scope of our company's legal obligations and compliance with company policies.
Employee Candidate Information	: It means the curriculum vitae of our candidates who have applied for a job in our company by any means or who are employees and/or trainees.
Vehicle Information	: It means information about vehicles associated with the data owner. (eg license plate)
Location Data	: Information that determines the location of our employees and the employees of the institutions we cooperate with when using our Company's vehicles.

Information of Family Members and Relatives	:	It means information about the family members and relatives of our customers, guarantors, employees, employee candidates and/or employees of our suppliers.
Marketing Information	:	It means the personal data processed for the marketing of our products and services by customizing them in line with the usage habits, tastes and needs of the personal data owner, and the reports and evaluations created as a result of these processing results.
Sensitive Personal Data	:	It means the data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data of individuals.

APPENDIX-3 PURPOSES OF PROCESSING PERSONAL DATA

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
<p>Planning and/or carrying out our company's human resources policies and processes</p>	<p>Planning and/or carrying out the employment and/or personnel affairs processes of the employees</p>
	<p>Planning and/or carrying out internal/external training activities</p>
	<p>Planning and/or carrying out reference and/or intelligence activities for personnel procurement and/or Company security processes</p>
	<p>Creation of personal records of subcontractor employees</p>
<p>Planning and/or execution of activities to ensure the legal and technical security of our company and related persons who have a business relationship with our company</p>	<p>Planning and/or fulfillment of the necessary operational activities to ensure that the Company's activities are carried out in accordance with Company procedures and/or relevant legislation</p>
	<p>Planning and/or fulfillment of companies and partnership law transactions</p>
	<p>Planning and/or fulfillment of necessary activities for compliance with ground operations security policies and procedures</p>
	<p>Follow up Legal Affairs</p>
	<p>Planning and/or execution of activities for providing and recording information or documents and demands requested from official institutions and/or organizations</p>
	<p>Ensuring that the Data is accurate and up-to-date</p>
	<p>Ensuring the security of company operations</p>
	<p>Planning, auditing and/or fulfillment of information security processes</p>
	<p>Creation and/or management of information technology infrastructure</p>
	<p>Planning and/or carrying out our company's legal compliance activities arising from national or international legislation</p>
	<p>Planning and/or carrying out our company's internal/external audit, inspection, investigation and/or control activities</p>
	<p>Follow-up of contract processes and/or legal requests</p>
	<p>Ensuring the security of company fixtures and/or resources</p>
	<p>Ensuring the security of company premises and/or facilities</p>

	Creating and/or tracking visitor records
Planning and/or executing the activities required for recommending and promoting the products and services offered by the Company and/or on behalf of our Company to the relevant persons by customizing them according to their tastes, usage habits and needs	Planning and/or fulfillment of campaign and/or promotion and/or advertisement processes
	Determination and/or evaluation of the persons to be subject to marketing activities in line with consumer behavior criteria
	Designing and/or carrying out personalized marketing and/or promotional activities (data enrichment, profiling, segmentation and similar activities)
	Planning and/or carrying out the data analytics studies for marketing purposes
	Planning and/or carrying out the measurement and reporting activities of campaign performances
	Planning and/or carrying out marketing processes of products and/or services
	Creation and/or follow-up of application and/or sales processes for products and/or services
Carrying out the necessary studies and the relevant business processes in order to benefit the relevant persons from the products and / or services offered by and / or on behalf of our Company	Planning and/or carrying out the activities related to customer satisfaction and/or experience
	Evaluation of customer requests and/or complaints collected in digital and/or other channels
	Creation of membership
	Planning and/or conduct of activities related to invoice issuance, verification and/or cancellation
	Planning and/or carrying out activities regarding the return/renewal/replacement of products
	Receiving orders/requests, entering them into the system and/or following up
For the realization of commercial and/or operational activities carried out by our company; Carrying out the necessary studies by our relevant business units and conducting the related business processes	Planning and/or carrying out the invitations and/or organizations aim to product/service promotion
	Follow-up of finance and/or accounting works
	Planning and/or carrying out efficiency/productivity and/or appropriateness analysis of business activities
	Planning and/or carrying out logistics/transport activities
	Planning and/or carrying out stock and/or shipment processes of our company's products
	Planning and/or fulfillment of purchasing processes
	Planning and/or carrying out sponsorship activities
	Planning and/or carrying out activities related to event and organization management

	Planning and/or carrying out corporate communication activities
	Planning and/or carrying out supply chain management processes
	Planning and/or carrying out operation and/or efficiency processes
	Identification and/or control of the authorization of our employees and persons outside the Company to access information
	Planning and/or carrying out product development/design processes
	Planning and/or fulfillment of internal/external reporting activities
Planning and/or carrying out our company's commercial and/or business strategies	Management of relations with business partners and/or suppliers
	Making or carrying out budget studies
	Planning and/or carrying out risk assessment activities and/or feasibility studies for potential business partner/supplier/subcontractor selection
	Planning and/or carrying out the company's financial risk processes

APPENDIX- 4 THIRD PARTIES TO WHOM PERSONAL DATA IS TRANSFERRED AND THE PURPOSE OF TRANSFER

Persons to whom Data Transfer can be made	Definition	Purpose of Data Transfer
Supplier	<p>It means the parties that provide services to our Company in line with the data processing purposes and instructions of our Company within the scope of the commercial activities of our Company.</p> <ul style="list-style-type: none"> • 	<p>Limited personal data is transferred to our Company, which is outsourced by our company from the supplier and in order to ensure that the necessary services are provided to our Company and to carry out the commercial activities of our Company.</p>
Business partner	<p>It means the parties with which our company cooperates for purposes such as carrying out joint programs in events, organizations or similar activities while carrying out its commercial activities.</p> <ul style="list-style-type: none"> • 	<p>Limited personal data is transferred in order to ensure that the purposes of the establishment of the business partnership are fulfilled.</p>
Shareholders	<p>It means TAV Holding Corporation and Unifree Duty Free Management Inc., which are authorized to design strategies and audit activities regarding our Company's commercial activities in accordance with the provisions of the relevant legislation.</p>	<p>In accordance with the provisions of the relevant legislation, personal data is transferred, limited to the purposes of designing strategies and auditing of our Company's commercial activities.</p>
Legally Authorized Public Institutions and Organizations	<p>It means the public institutions and organizations authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation.</p> <ul style="list-style-type: none"> • 	<p>Personal data is transferred within the legal authority of the relevant public institutions and organizations, limited to the purpose requested.</p>
Legally Authorized Private Institutions	<p>It means the institutions or organizations that have been established in accordance with certain conditions determined by law in accordance with the provisions of the relevant legislation and continue their activities within the framework determined by the law.</p>	<p>Personal data is shared in a limited manner regarding the subjects within the scope of the activities carried out by the relevant private institutions and organizations and in order to ensure the fringe benefits and benefits provided to our employees.</p>