

BELCEHAN TOURISM FOOD CONSTRUCTION IMPORT EXPORT TRANSPORT INDUSTRY AND TRADE LIMITED COMPANY – CAMERA RECORDING SYSTEMS DISCLOSURE STATEMENT

This disclosure statement has been prepared by Belcehan Tourism Food Construction Import Export Transport Industry and Trade Limited Company (“BELCEHAN”), whose information is provided below, as the data controller within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698 (“Law”) for individuals whose camera recordings are collected.

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Categories of Processed Personal Data

Visual recordings (camera footage) of you are processed entirely through automated methods via security cameras located in and around the hotel buildings and annexes. These data include any information relating to an identified or identifiable natural person. **No audio recordings are taken.**

Method of Personal Data Collection

Your personal data are collected entirely automatically via security cameras installed inside and outside the hotel building.

Purposes of Processing Personal Data

Your personal data are processed in accordance with the general principles stated in Article 4 of the Law for the following purposes:

- **Ensuring Physical Security:** To ensure the security of the hotel building, facilities, lobbies, corridors, parking areas, and other common areas, to monitor visitor entries and exits, to prevent criminal acts such as theft, sabotage, or terrorism, and to provide deterrence.
- **Fulfilling Legal Obligations:** Compliance with obligations arising from relevant legislation (e.g., Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Annexes and other applicable laws).
- **Resolution of Legal Disputes, Establishment, Exercise, and Protection of Rights:** Use as evidence in possible legal disputes, carrying out legal proceedings, and protecting rights.

- **Protection of Legitimate Interests:** Protecting the legitimate interests of our Company (e.g., detection and investigation of incidents, evidence collection, operational efficiency, and security).

Legal Grounds for Processing Personal Data

Your personal data are processed for the purposes described above based on the following legal grounds under Article 5 of the Law:

- **Necessity for Fulfilling the Data Controller's Legal Obligation:** Processing of personal data is necessary for our Company to fulfill security and auditing obligations arising from laws.
- **Necessity for Establishment, Exercise, or Protection of a Right:** Processing of personal data is necessary to detect, prove, and exercise or protect any right in case of violation or dispute.
- **Necessity for the Legitimate Interests of the Data Controller Provided It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject:** Processing is necessary for our legitimate interests, such as company security, operational efficiency, and prevention of potential risks, without harming your fundamental rights and freedoms.

Recipients of Personal Data and Purpose of Transfer

Your collected personal data may be transferred to the following recipient groups in line with the purposes mentioned above and the personal data processing conditions specified in Articles 8 and 9 of the Law:

- **Authorized Public Institutions and Organizations:** Public institutions and organizations authorized to request information under legal regulations (e.g., courts, prosecutor's offices, law enforcement units, enforcement offices, supervisory authorities).
- **Business Partners and Service Providers:** Our business partners and solution partners providing auditing and consultancy services, such as security service companies and law firms.

Requests under Article 11 of the Law, which regulates the "*Rights of the Data Subject*", can be made via a signed petition prepared in accordance with Article 5 of the Communiqué on the Procedures and Principles for Application to the Data Controller (Official Gazette: 10.03.2018/30356), or via the "*Personal Data Owner Application Form*" available at www.belcehanhotel.com:

- By applying **personally** to BELCEHAN's address,
- Through a **notary**,
- Via your registered e-mail in our system or, if your e-mail is not in our system, by sending the form with a **mobile signature/e-signature**.

Belcehan Tourism Food Construction Import Export Transport Industry and Trade Limited Company

DISCLOSURE ACKNOWLEDGEMENT

I hereby declare that I have been informed about all matters described above, that I have read and understood the disclosure statement, and that I am aware of my rights under Article 11 of Law No. 6698.

Data Subject

Name and Surname:

T.C. Identity No:

Date:/..../.....

Signature: