

## **BELCEHAN TOURISM FOOD CONSTRUCTION IMPORT EXPORT TRANSPORT INDUSTRY AND TRADE LIMITED COMPANY HOTEL PRIVACY NOTICE**

This privacy notice has been prepared by Belcehan Tourism Food Construction Import Export Transport Industry and Trade Limited Company ("BELCEHAN"), listed below, as the data controller, to inform hotel guests within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698 ("Law") and the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Disclosure Obligation.

**MERSIS Number:** 0162 0079 4910 0010

**Address:** Öludeniz Mah. Kıdrak (Old) Cad. Öludeniz Otel 1-3 No: 1 C Fethiye/ Muğla

**Phone:** +90 252 617 0133

**Email:** info@belcehanhotel.com

**KEP:** belcehanturizm@hs01.kep.tr

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### **Categories of Personal Data Processed and Purpose of Processing**

To provide you with better services and fulfill our legal obligations, the following personal data categories may be processed during and after your stay:

- **Identity Information:** Your name, surname, Turkish ID Number (or passport/ID number), date of birth, nationality, signature.  
**Purpose:** Provision of accommodation services, compliance with legal identity reporting obligations (e.g., to law enforcement), billing and accounting, contract performance.
- **Contact Information:** Your phone number, address, email address.  
**Purpose:** Communication regarding accommodation services, management of reservation and service processes, fulfillment of legal obligations.
- **Accommodation Information:** Room number, check-in/check-out dates, special requests (if any).  
**Purpose:** Effective management and provision of accommodation services, ensuring guest satisfaction.
- **Payment Information:** Credit card details (only at the time of payment and under necessary security measures).  
**Purpose:** Collection of accommodation and additional service fees.
- **Physical Space Security Information (Visual Records):** Recordings obtained through security cameras in common areas and the exterior of the hotel.  
**Purpose:** Ensuring physical security, preventing or resolving potential legal disputes.
- **Health Information (Special Category Personal Data):** Health information, as special category personal data under Article 6 of the Law, may be processed without explicit consent if necessary for public health protection, preventive medicine, medical diagnosis, treatment, care services, or planning, management, and financing of health services, by staff under confidentiality obligation or authorized institutions, in compliance with legal obligations (e.g., emergency medical interventions, contagious disease reporting).

- **Other Data:** Guest satisfaction surveys (based on legitimate interest), complaints or requests submitted by you.  
**Purpose:** Improving service quality, managing guest relations, addressing complaints and requests.

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## Method and Legal Basis of Personal Data Collection

Personal data is collected directly from you (e.g., forms filled during check-in, phone calls, emails) or partially/fully via automated means (e.g., CCTV recordings).

Data is processed based on the conditions in Articles 5 and 6 of the Law:

- **Explicitly required by law:** To fulfill legal obligations (e.g., Identity Notification Law).
- **Necessary for contract performance:** To process data essential for providing accommodation services under the contract.
- **Necessary for legal obligations:** To comply with legal obligations applicable to our company (e.g., tax audits, payment transactions).
- **Made public by the data subject:** Data voluntarily disclosed by you is processed in accordance with your disclosure intention.
- **Necessary to establish, exercise, or defend a right:** Data processing required to establish, exercise, or protect our rights (e.g., evidence in legal proceedings).
- **Legitimate interest of the data controller without harming rights/freedoms:** Data processing required for the legitimate interest of the company, without harming your fundamental rights and freedoms (e.g., security via cameras, corporate operations).

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## Recipients of Personal Data and Purposes

Collected personal data may be shared with the following recipient groups in line with the processing purposes and Articles 8 and 9 of the Law:

- **Public authorities authorized by law:** Law enforcement, tax offices, courts.
- **Legally authorized private entities:** Audit firms, lawyers.
- **Service providers:** IT service providers, accounting firms, payment service providers, acting under instructions of the data controller. Payment service providers may sometimes act as independent data controllers.
- **Business partners:** Travel agencies, tour operators, etc.
- **Other third parties:** Where explicit consent is given.

Personal data in the categories of identity, contact, and customer transactions may be transferred abroad to business partners only in exceptional (temporary/occasional) cases under Article 9(6) of the Law. Transfers are limited to legal grounds such as contract performance for requested international reservations or services, or

establishing/exercising/protecting a right due to legal disputes. Outside these conditions, international transfers are conducted only with **explicit consent**.

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## **Disclosure Statement**

I declare that I have been informed about all the above points, I have read and understood the privacy notice, and I am aware of my rights under Article 11 of the Law No. 6698.

### **Data Subject**

Name-Surname: .....

Turkish ID No: .....

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

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## **EXPLICIT CONSENT**

I consent to the limited and proportionate processing of my personal data collected verbally, in writing, or electronically by the data controller for the purpose of international data transfer:

I Consent       I Do Not Consent

### **Data Subject**

Name-Surname: .....

Turkish ID No: .....

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