

CORPORATE GENERAL PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

As **NIVASOLE HOTELCILIK TURIZM VE TICARET LTD. STI. (Nivasole Lara)**, we have prepared this Privacy Notice to inform our Visitors, Online Visitors, Customers, Prospective Customers, Supplier Employees, and Supplier Representatives regarding the processing, storage, and transfer of their personal data within the scope of our activities carried out in accordance with the Turkish Personal Data Protection Law No. 6698 ("KVKK") and the applicable legislation.

1. What Categories of Personal Data Do We Process and For What Purposes?

Your personal data may be processed by Nivasole Lara in accordance with the principles set forth under Article 4 of the KVKK:

- Processing lawfully and fairly,
- Ensuring accuracy and keeping data up to date where necessary,
- Processing for specific, explicit, and legitimate purposes,
- Being relevant, limited, and proportionate to the purposes for which they are processed,
- Retaining data for the period stipulated by applicable legislation or required for the purpose of processing.

Within the scope of our existing and potential business relationships, personal data may be processed for the following purposes.

A. Visitors

Identity data (e.g., name and surname) and physical premises security data (e.g., CCTV recordings) may be processed for:

- Creating and monitoring visitor records,
- Ensuring physical premises security.

B. Online Visitors

Transaction security data (e.g., IP address), marketing data (e.g., browsing history and cookie records), and where voluntarily provided, identity and contact information (e.g., e-mail address) may be processed for:

- Compliance with legal obligations,
- Managing information security processes,
- Handling requests and complaints,

- Conducting communication activities,
- Providing information to authorized persons, institutions, and public authorities,
- Enabling access to our website and online services.

C. Customers

Identity data, contact data, customer transaction data (e.g., order information), physical premises security data, financial data, legal transaction data, and marketing data relating to individual customers or representatives/employees of corporate customers may be processed for:

- Compliance with legal obligations,
- Conducting finance and accounting activities,
- Managing and auditing business operations,
- Managing logistics activities,
- Providing after-sales support services,
- Managing sales processes,
- Conducting marketing analysis,
- Managing contractual processes,
- Providing information to authorized institutions and authorities,
- Ensuring physical premises security,
- Resolving legal disputes,
- Carrying out archiving and record-retention activities,
- Managing risk assessment and risk management processes,
- Conducting advertising, campaign, and promotional activities and sending commercial electronic communications,
- Managing customer loyalty and relationship management processes,
- Conducting communication activities.

D. Prospective Customers

Identity data, contact data, customer transaction data, physical premises security data, and marketing data may be processed for:

- Managing sales processes,
- Conducting contractual negotiations and processes,

- Ensuring physical premises security,
- Conducting advertising, campaign, and promotional activities and sending commercial electronic communications,
- Conducting marketing analysis activities.

E. Supplier Employees

Identity data, contact data, and physical premises security data may be processed for:

- Conducting communication activities,
- Managing and auditing business operations,
- Ensuring physical premises security,
- Managing supply chain processes,
- Conducting logistics activities,
- Ensuring compliance with legal obligations,
- Managing occupational health and safety processes.

F. Supplier Representatives

Identity data, contact data, physical premises security data, customer transaction data, financial data, marketing data, and legal transaction data relating to individual suppliers or representatives of corporate suppliers may be processed for:

- Managing and auditing business operations,
- Conducting procurement processes,
- Managing finance and accounting activities,
- Conducting contractual processes,
- Managing investment-related activities,
- Ensuring physical premises security,
- Following up and managing legal affairs.

2. How Do We Collect Your Personal Data?

Your personal data may be collected through physical means such as order forms, contracts, and visitor forms, as well as through information systems, electronic devices (including computers, telecommunications infrastructure, and telephones), third-party

sources, our website, and documents provided by the data subject, through automated or non-automated methods.

3. Legal Basis for Processing Personal Data

Your personal data is processed pursuant to Article 5 of the KVKK based on the following legal grounds:

- Explicitly provided for by law,
- Being necessary for the establishment or performance of a contract,
- Being necessary for the fulfillment of the legal obligations of the Data Controller,
- Being necessary for the establishment, exercise, or protection of a legal right,
- Being necessary for the legitimate interests of the Data Controller, provided that such processing does not violate the fundamental rights and freedoms of the data subject.

In addition, identity and contact data of Customers and Prospective Customers may be processed based on their explicit consent for advertising, promotional activities, campaigns, and the sending of commercial electronic communications.

4. Do We Transfer Your Personal Data to Third Parties?

Personal data may be transferred where necessary and in accordance with applicable legislation to:

- Authorized public institutions and authorities,
- Judicial authorities and law enforcement agencies,
- Legal advisors and law firms,
- Group companies,
- Information technology service providers,
- Suppliers,
- Cargo and logistics companies,
- Insurance companies,
- Banks,
- Certified public accountants and financial advisors.

Such transfers are carried out solely for the purposes specified in this Notice and within the limits prescribed by law.

5. Do We Transfer Personal Data Abroad?

As Nivasole Lara, we do **not transfer personal data abroad**.

6. How Can You Exercise Your Rights?

Pursuant to Article 11 of the KVKK, data subjects may exercise their rights by submitting requests through the **Data Subject Application Form** available on the Nivasole Lara website.

Data Controller

NIVASOLE HOTELCİLİK TURİZM VE TİCARET LTD. STİ.

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