

## SUMMA TURİZM YATIRIMCILIĞI A.Ş.

### Personal Data Protection Statement and Clarification Text

As Summa Tourism Investment Joint Stock Company (hereinafter referred to as 'Summa'), the protection of your personal data and private information is valuable to us. Therefore, we make every effort and show due diligence to ensure that personal data related to individuals connected with Summa is processed and stored in accordance with the Law on Protection of Personal Data No. 6698 ("KVKK"). As the Data Controller, Summa takes the necessary administrative and technical measures to protect your personal data in all transactions and processes your personal data under the conditions explained below and within the limits set forth in the legislation, in accordance with KVKK.

Personal information recorded during the visit to our website is processed in accordance with the legislation regarding the Protection of Personal Data. Please also review our [Privacy Policy](#), which can be found on our page. However, it is important to note that Summa cannot provide a guarantee regarding data security on other websites linked from our site. The data security policy of the relevant page should be carefully examined.

#### 1. Legal Nature and Scope

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Article 10 of the Personal Data Protection Law No. 6698 ("KVKK") requires that individuals whose data is processed must be informed while obtaining their consent. The title of the article is "Obligation of the Data Controller to Inform."

According to the provisions of the KVKK, Summa is the "Data Controller." In this context, the obligation to inform includes informing data subjects about the identity of the data controller, the purposes of processing personal data, the individuals to whom personal data is transferred and the purposes of such transfers, the legal grounds for collecting personal data, to whom it may be transferred and by what means, and the rights of the data subject as stated in Article 11 of the KVKK, such as the right to request updates, deletion, or anonymization.

As the Data Controller, Summa informs and enlightens data subjects regarding the processing of their personal data in accordance with the provisions of Article 10 of the KVKK, within the boundaries and conditions specified in the relevant legislation, through the Personal Data Processing Clarification Text.

#### 2. Identity of the Data Controller

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According to Article 3, Paragraph 1, Subparagraph (1) of the KVKK, the data controller is defined as "natural or legal persons who determine the purposes and means of processing personal data and are responsible for the establishment and management of the data recording system." In this context, the data controller is Summa, the entity whose website you visit.

#### **Summa Turizm Yatırımcılığı Anonim Şirketi**

**Company Address:** Çankaya Mahallesi 27 Aralık Sok. No: 3 Çankaya Ankara 06530

**Company KEP Address:** summaturizm@hs03.kep.tr

**Company e-Mail Address:** kvkk@summa.com.tr

**Company contact number:** (0212) 290 30 70



### 3. Data Processor

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A natural or legal person who processes personal data on behalf of the data controller, based on the authorization given by the data controller, is defined as the "Data Processor" in Article 3 of the KVKK.

### 4. The Purposes of Processing Your Personal Data

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Your personal data will be processed in accordance with the principles outlined in the KVKK;

- a) To keep you informed about the products and services offered by Summa, and to ensure you benefit from them in the best possible way;
- b) To improve the quality of the products/services offered by Summa, and to present and recommend them customized according to our customers' needs, preferences, and usage habits;
- c) To inform you about our services and, when necessary, to clarify and explain certain matters to you;
- d) To ensure the best planning and implementation of our human resources policies; to ensure the correct planning and execution of our commercial partnerships and strategies; to ensure the legal, commercial, and physical security of our company and business partners, as well as the company's operational processes; and to work on ensuring you benefit from the products and services offered by our company in the best way possible;
- e) To ensure the highest level of data security, to create databases, to improve the services offered on our website, to contact those who make requests or complaints to our company, to fix errors on our website, and to ensure compliance with the provisions outlined in our [Privacy Policy](#) shared on our website;
- f) Personal data will be processed in accordance with the processing conditions specified in Articles 5 and 6 of the KVKK, for the purpose of determining the company's strategies.

### 5. Principles Regarding the Processing of Personal Data

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As Summa;

- a) To process in accordance with the law and principles of integrity,
- b) To strive for accuracy and currency,
- c) To process for specific, clear, and legitimate purposes,
- ç) To be relevant, limited, and proportional to the purposes for which they are processed,
- d) To be retained for the duration required by the relevant legislation or the purpose for which they were processed.

### 6. Ways of Processing Personal Data

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Your data will be stored and processed at Summa only if there is either your **consent** or a **legal basis** for processing.

### 7. To whom and for what purpose personal data may be transferred.

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The personal data collected and processed in accordance with the KVKK in our company will be transferred only for the purpose of carrying out the work and under confidentiality agreements;

Summa may transfer personal data to solution partners and companies acting as performance assistants.



## 8. The Method and Legal Reason for Collecting Your Personal Data

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Your personal data may vary depending on the service, product, or commercial activity provided by our company;

In accordance with Articles 4, 5, and 6 of the KVKK, your personal data may be collected and processed, updated, and processed through automatic or non-automatic methods, including offices, call centers, websites, social media platforms, mobile applications, and similar means, either verbally, in writing, or electronically.

Your personal data is collected in any verbal, written, or electronic form for the purpose of providing the products and/or services offered by the Company in accordance with the specified legal framework and enabling the Company to fully and accurately fulfill its contractual and legal obligations. Personal data collected for this legal reason may be processed and transferred within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK and for the purposes stated in this Clarification Text.

## 9. How do we protect it?

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All necessary technical and administrative measures are taken to protect the personal data collected by Summa and prevent unauthorized access, ensuring that our customers and potential customers are not harmed. In this regard, software is made to comply with standards, third parties are carefully selected, and compliance with our [Privacy Policy](#) is ensured within the company.

## 10. Rights of the Personal Data Owner and Application

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As personal data owners, if you submit your requests regarding your rights listed in Article 11 of the KVKK to our Company using the methods outlined below in this Privacy Notice, our Company will respond to your request within thirty days free of charge, depending on the nature of the request. However, if the Personal Data Protection Board requires a fee, the fee determined by our Company's tariff will be charged. Furthermore, according to the current legislation, personal data applications must be made by the data subject themselves, so only the part of the application concerning you will be answered, and applications related to your spouse, relative, or friend will not be accepted.

In this context, personal data owners can submit their requests related to themselves by contacting us through the method announced on our website by Summa.

- a) Learn whether personal data is being processed,
- b) Request information about personal data if it has been processed,
- c) Learn the purpose of processing personal data and whether it is being used in accordance with its purpose,
- d) Know the third parties to whom personal data is transferred, whether domestically or internationally,
- e) Request correction if personal data is processed incorrectly or incompletely, and request that the correction be communicated to third parties to whom the data has been transferred,
- f) Request the deletion or destruction of personal data if the reasons for processing it no longer exist, even though it has been processed in accordance with the KVKK and relevant laws, and request that the deletion be communicated to third parties to whom the data has been transferred,

- g) Object to a result that may arise from the exclusive analysis of processed data through automated systems,
- h) Request compensation for any damage caused by the unlawful processing of personal data.

## 11. Making the Application

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In accordance with Article 13, Paragraph 1 of the KVKK, you can submit your request to exercise your rights mentioned in Article 11 of the same law via registered electronic mail (KEP) or by using the email address previously provided to us and registered in our system, at kvkk@summa.com.tr, or by submitting it in writing, either personally, by notary, or by registered mail with return receipt. You can access the application and information [Application and Request Form](#) with the necessary explanations via the link.

In the application;

- a) Your name, surname, and signature if the application is written,
- b) If you are a Turkish citizen, your Turkish ID number; if you are a foreigner, your nationality, passport number, or if available, your ID number,
- c) Your residential address or business address for notification purposes,
- ç) If available, your electronic mail address, telephone, and fax number for notification,
- d) The subject of your request must be included. Relevant information and documents should be attached to the application.