

## PREFACE

The protection of personal data is of great importance to Summa Turizm Yatırımcılığı A.Ş. We take great care in safeguarding the information of everyone who contacts us and shares their personal data in any form. To ensure the security of this information, we have taken all necessary precautions within the company. You can engage with Summa, confident that your personal data is secure. We will respect your rights regarding your data, which are protected by the Turkish Constitution and laws. Below, we are sharing our Privacy Policy, which has been implemented in our company.

You can be assured that we will show full sensitivity to any improvement suggestions, applications, and potential complaints from you. For any concerns regarding your personal data, please feel free to reach out to us. Just as we show care and attention in all our services, we will also demonstrate the same level of sensitivity in the protection of your personal data.

Best Regards,

**SUMMA TURİZM YATIRIMCILIĞI A.Ş.**

## 1. Purpose

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To date, Summa Turizm Yatırımcılığı A.Ş. (hereinafter referred to as Summa) has maintained the confidentiality of the personal data collected due to the sensitivity of the work we undertake and has never shared it with third parties for purposes other than those intended. The protection of personal data is a fundamental policy of our company. Even before any legal regulation, our company has attached great importance to the confidentiality of personal data and adopted it as a working principle. As Summa, we also commit to fully comply with all the responsibilities set forth by the Personal Data Protection Law.

## 2. Scope and Amendments

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This Policy, prepared by our company, has been developed in accordance with the Law No. 6698 on the Protection of Personal Data ("KVKK").

The data obtained from you with your consent or based on other lawful grounds specified in the Law will be used to improve the quality of the services we provide and enhance our quality policy. Additionally, some of the data we have will be depersonalized and anonymized. These data are used for statistical purposes and are not subject to the Law or our Policy.

The Summa Privacy Policy aims to protect the data of our customers, potential customers, employees, clients and employees of partner companies working with us, as well as other individuals whose data is automatically collected, and includes regulations related to these.

Our company reserves the right to amend our policy and regulation/Directive in accordance with the law and to ensure better protection of personal data.

## 3. Fundamental Principles of Personal Data Processing

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- a) **Compliance with the law and principles of honesty:** Summa questions the source of the data it collects or receives from other companies and ensures that the data is obtained in compliance with the law and principles of honesty.
- b) **Accuracy and, when necessary, being up to date:** Summa ensures that all data within the organization is accurate, free from incorrect information, and updates personal data when changes occur, provided it is communicated to them.
- c) **Processed for specific, explicit, and legitimate purposes:** Summa processes data only for the purposes for which it has obtained the individuals' consent during the provision of services. It does not process, use, or allow the use of data for purposes other than the intended business purposes.
- d) **Relevant, limited, and proportionate to the purpose:** Summa uses data only to the extent necessary for the purpose it was processed and as required by the service.
- e) **Retained for as long as required by relevant legislation or for the purpose for which they were processed:** Summa retains data derived from contracts for the duration required by the law, including dispute resolution periods and the requirements of commercial and tax law. Once these purposes are no longer relevant, the data is deleted, destroyed, or anonymized. This is done in accordance with the Personal Data Deletion Directive.

It is important to note that, whether Summa has collected or processed the data based on consent or in accordance with the law, the principles outlined above still apply.

## 4. Rights of the Data Subject as Stated in Article 11 of the Personal Data Protection Law (KVKK)

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According to Article 11 of the Personal Data Protection Law (KVKK), you have the following rights. To facilitate the exercise of these rights, Summa has also prepared a dedicated application form, which is made available to you on our website.

Individuals whose personal data is processed can apply to the relevant contact point announced on our website by Summa in order to exercise their rights related to their data:

- a) To learn whether personal data is being processed,
- b) To request information about the personal data if it has been processed,
- c) To learn the purpose of processing personal data and whether they are being used in accordance with their purpose,
- d) To know the third parties to whom personal data has been transferred, both domestically and internationally,
- e) To request correction of personal data if it has been processed incorrectly or incompletely, and to request that this correction be communicated to third parties to whom the personal data has been transferred,
- f) To request the deletion or destruction of personal data in cases where the reasons for processing are no longer valid, even if the data has been processed in accordance with the Personal Data Protection Law (KVK Law) and other relevant laws, and to request that this action be communicated to third parties to whom the personal data has been transferred,
- g) To object to a decision based solely on automated processing of personal data, if it results in an adverse outcome for the individual,
- h) To request compensation for damages in case of harm caused by unlawful processing of personal data. Summa respects these rights.

## 5. Principle of Maximum Savings/Minimalism Principle

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According to this principle, also referred to as the **Minimalism Principle**, Summa processes only the data that is strictly necessary. The data collected is determined based on the specific purpose for which it is needed, and any unnecessary data is not gathered. Similarly, any excess data that reaches our company is either not recorded in our systems, deleted, or anonymized. Such anonymized data may be used for statistical purposes.

## 6. Deletion of Personal Data

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Once the legally required retention periods expire, judicial processes conclude, or other necessities no longer apply, these personal data will be deleted, destroyed, or anonymized by our company, either automatically or upon the request of the data subject.

## 7. Data Correctness and Relevance

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The data within Summa is, as a rule, processed based on the declaration of the individuals concerned. Summa is not obligated to verify the accuracy of the data declared by customers or individuals who contact Summa, nor is this action carried out due to legal and operational principles. Declared data is considered accurate. The principle of accuracy and timeliness of personal data is also adopted by Summa. Our company updates the personal data processed from official documents received or at the request of the individual concerned and takes the necessary measures to ensure this.



## 8. Confidentiality and Data Privacy

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Personal data is confidential, and Summa adheres to this confidentiality. Personal data can only be accessed within the company by authorized individuals. Necessary technical and administrative measures are taken to protect the personal data collected by Summa and ensure that unauthorized individuals do not gain access, thus preventing harm to the data subject. In this regard, software compliance with standards, careful selection of third parties, and adherence to the Privacy Policy within the company are ensured. Companies with whom we share personal data, in accordance with the law, are also required to protect the data.

## 9. Data Processing Purposes

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It will be carried out in accordance with the purposes specified in Summa's Personal Data Processing Disclosure Text.

## 10. Customer, Potential Customer, and Business and Solution Partners Data

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### a. Collection and Processing of Data for Contractual Relationship

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If a contractual relationship has been established with our customers and potential customers, the collected personal data can be used without the customer's consent. However, this use will be in line with the purpose of the contract. The data will be used to better execute the contract and meet the requirements of the service, and if necessary, customers will be contacted for updates.

### b. Business and Solution Partners' Data

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Summa adopts a principle of complying with the law when sharing data with both business and solution partners. Data is shared with these partners only to the extent required by the service, under a confidentiality commitment, and it is mandatory for these parties to take necessary measures to ensure data security.

## 11. Advertising Purpose Data Processing

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In accordance with the Law on the Regulation of E-Commerce and the Regulation on Commercial Communications and Commercial Electronic Messages, advertising electronic communications can only be sent to individuals who have previously given consent. It is essential that the consent of the person to whom the advertisement will be sent is clearly obtained.

In accordance with the same regulations, Summa also adheres to the details of the "consent" requirement. The consent to be obtained should cover all commercial electronic messages sent to recipients' electronic communication addresses for the purpose of promoting and marketing the company's products and services, promoting the business, or increasing visibility through content such as greetings and congratulations. This consent can be obtained in writing in physical form or via any electronic communication means. The important aspect is that the recipient's positive declaration of consent to receive commercial electronic messages, along with their full name and electronic communication address, is obtained.

## 12. Data Processing Due to the Company's Legal Obligation or as Explicitly Required by Law

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Personal data may be processed without additional consent if explicitly specified in the relevant legislation or for the purpose of fulfilling a legal obligation set forth by law. The type and scope of data processing must be necessary for the legally permitted data processing activity and comply with the applicable legal provisions.

## 13. Company's Data Processing

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Personal data may be processed in line with the services provided by the company and its legitimate purposes. However, the data cannot be used for services that are unlawful in any way.

## 14. Processing of Special Categories of Data

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Summa places great importance on taking the necessary precautions as specified by the Board for processing special categories of personal data. In our company, special categories of personal data are processed in accordance with the "Protection and Processing of Special Categories of Personal Data Policy."

## 15. Data Processed by Automated Systems

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Summa acts in accordance with the Law regarding data processed through automated systems. Information obtained from these data cannot be used against the individual without their explicit consent. However, Summa may make decisions regarding individuals based on the data in its system.

## 16. User Information and the Internet

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Summa acts in accordance with the law regarding data processed through automated systems. Information obtained from these data cannot be used against individuals without their explicit consent. However, Summa may make decisions regarding individuals with whom it engages based on the data in its system.

Individuals will be informed about our applications on the website. Personal data will be processed in accordance with the law.

## 17. Employee Data

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### a. Processing of Data for Employment Relationship

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The personal data of our employees may be processed without consent, to the extent necessary for the employment relationship and health insurance purposes. However, Summa ensures the confidentiality and protection of the personal data of its employees.

### b. Processing Due to Legal Obligations

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Summa may process personal data of its employees without obtaining additional consent, provided that the processing is explicitly stated in the relevant legislation or is necessary for fulfilling a legal obligation set forth by law. This is limited to obligations arising from the law.

### c. Processing for the Benefit of Employees

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Summa may process personal data without obtaining consent for transactions that benefit employees, such as private health insurance. Additionally, Summa may process employees' data for disputes arising from employment relationships.

### d. Processing of Sensitive Personal Data

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According to the Law, personal data such as a person's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, dress and attire, membership in associations, foundations, or unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, are considered sensitive personal data.

Summa takes the necessary precautions set by the Board, in addition to obtaining the relevant person's consent, when processing sensitive personal data. Sensitive personal data can only be processed without the person's consent in cases explicitly permitted by the Law and in a limited manner.

## e. Data Processed through Automated Systems

Summa acts in accordance with the Law regarding data processed through automated systems. Information obtained from these data cannot be used against the individual without their explicit consent. However, Summa may make decisions regarding individuals based on the data in its system.

## f. Telecommunication and Mobile Phone

The computers, phones, emails, and other applications assigned to employees within the company are allocated solely for business purposes. Employees are not allowed to use these company-provided tools for personal purposes or communication. The company has the right to monitor and control all data on these devices. employee undertakes not to store any data or information unrelated to work on the computer, phones, or other devices assigned to them from the moment they start their employment.

## 18. Transfer of Personal Data Within and Outside the Country

Personal data may be shared by Summa with the majority shareholder, as well as with business and solution partners, for the purpose of providing the service.

Summa may transfer personal data to its suppliers, limited to the necessary services to be provided for the execution of the company's commercial activities, which are sourced externally from suppliers.

Summa has the authority to transfer personal data domestically and internationally, in accordance with the conditions set by the Board and other applicable provisions in the Law, and subject to the consent of the individual.

## 19. Rights of the Data Subject

Summa acknowledges that, under the Law, the data subject has the right to give consent before their data is processed and has the right to determine the fate of their data after processing.

The data subject can contact Summa through our website for any inquiries related to their personal data;

- a) To learn whether personal data is being processed,
- b) To request information about the personal data if it has been processed,
- c) To learn the purpose of processing personal data and whether they are being used in accordance with their purpose,
- d) To know the third parties to whom personal data has been transferred, both domestically and internationally,
- e) To request correction of personal data if it has been processed incorrectly or incompletely, and to request that this correction be communicated to third parties to whom the personal data has been transferred,
- f) To request the deletion or destruction of personal data in cases where the reasons for processing are no longer valid, even if the data has been processed in accordance with the Personal Data Protection Law (KVK Law) and other relevant laws, and to request that this action be communicated to third parties to whom the personal data has been transferred,
- g) To object to a decision based solely on automated processing of personal data, if it results in an adverse outcome for the individual,
- h) To request compensation for damages in case of harm caused by unlawful processing of personal data. Summa respects these rights.

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Regarding anonymized data within the company, individuals do not have any rights. Summa may share personal data with relevant institutions and organizations for the purpose of performing judicial duties or exercising legal powers by state authorities in accordance with business and contractual relationships.

Data subjects can submit their requests regarding the above-mentioned rights by filling out the application form, which can be obtained from the official website of the Company. Your applications will be answered as soon as possible or within a maximum of 30 days after they are received, depending on the content of your application. Furthermore, only the part of the application related to you will be answered, and requests made about your spouse, relative, or friend will not be accepted. Summa may request additional relevant information and documents from the applicants.

## 20. Privacy Principle

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The data at Summa, whether belonging to employees or other individuals, is confidential. No one can use, copy, reproduce, transfer, or share this data for any purpose other than what is specified in the contract or is legally permitted, and it cannot be used for anything outside of business-related activities.

## 21. Data Processing Security

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The necessary technical and administrative measures are taken by Summa to protect the personal data collected and prevent unauthorized access, ensuring that our customers and potential customers are not harmed. In this context, software is ensured to comply with standards, third parties are carefully selected, and adherence to the Privacy Policy is maintained within the company. Security measures are continuously renewed and improved.

## 22. Audit

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Summa conducts the necessary internal and external audits regarding the protection of personal data.

## 23. Notification of Violations

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Summa acts immediately to rectify any violation related to personal data when notified of the incident. It minimizes the harm to the concerned individual and compensates for the damage. If personal data is accessed by unauthorized external parties, the situation is promptly reported to the Personal Data Protection Authority.

**You can submit your application regarding the notification of violations through the procedures specified on our corporate website.**

[Click here for the KVKK Application and Information Request Form.](#)