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Dear Royalty by Maxx Royal Member,

As part of ***the Royalty by Maxx Royal Loyalty Programme***, Voyag Tourism, Hotel Management, Construction, Industry and Trade Joint Stock Company, MRA Tourism and Hotel Management Joint Stock Company and ETS Ersoy Tourist Services JSC (“the Company” or “**Maxx Royal Resorts**”), we wish to inform you, in accordance with the Personal Data Protection Act No. 6698 (“the Act”), regarding the personal data we will process in our capacity as “**Data Controller**”. In this document;

- if you complete the membership form to join the ***Royalty by Maxx Royal Loyalty*** Programme on the **Maxx Royal Resorts** website at www.maxxroyal.com or via the **Maxx Royal Resorts** mobile app,
- if you consent to our marketing, segmentation and analysis activities directed at you,
- if you authorise us to establish commercial communication for the purpose of sending notifications regarding special campaigns, benefits, offers, content and promotions, as well as for advertising, promotion and marketing,

The privacy notice regarding your personal data that is being or will be processed is provided below.

1. IDENTITY OF THE DATA CONTROLLER

Company Name: • Voyag Tourism, Hotel Management, Construction, Industry and Trade Joint Stock Company (MERSIS: 0925015154000013) and MRA Tourism and Hotel Management Joint Stock Company (MERSIS: 0466063904000019)

Address: MERDİVENKÖY NEIGHBOURHOOD, NUR STREET, BLOCK C, NO. 1, INTERNAL DOOR NO. 26, KADIKÖY / ISTANBUL

Telephone number: +90 242 715 33 80

Email: kvkk@maxxroyal.com

Registered Email Addresses: voyageotel@hs01.kep.tr

2. YOUR PERSONAL DATA THAT WE PROCESS, OUR PURPOSES FOR PROCESSING AND LEGAL BASES

Personal Data Processing Process	Data Collected	Purpose of Personal Data Processing	Legal Basis
Royalty by Maxx Royal Membership Creation, Accommodation/Spending Information Tracking and Points Transactions	Your Identity Information (First Name, Surname, Date of Birth, Gender), Your Contact Details (Email Address, Telephone Number), Your Customer Transaction Information (Royalty by Maxx Royal Membership Number, Current Points Balance, Purchase Amount, Date of Expenditure, Accommodation Venue, Dates of Stay, Accommodation History, expenditure amounts, points earned and used)	Should you provide your “ explicit consent ”, for the purposes of processing your membership procedures to enable you to benefit from the advantages offered by the <i>Royalty by Maxx Royal</i> programme, and for the purposes of identity verification and the calculation and updating of loyalty points and/or to enable you to benefit from other gifts, advantages, discounts or benefits,	We process your personal data on the legal grounds that “the processing of personal data relating to the parties to a contract is necessary for the conclusion or performance of that contract”, and “the processing of personal data is necessary for the legitimate interests of the data controller, provided that such processing does not infringe upon the fundamental rights and freedoms of the data subject”.
Behavioural Analysis and Profiling Processes: Analysis and Reporting	Your Customer Transaction Information (accommodation habits, preferred hotels, survey results)	For the purposes of developing services, measuring customer satisfaction, analysing user preferences and interests, and thereby providing personalised content, offers and campaigns, as well as planning and carrying out marketing activities	we process this data provided you give your “ explicit consent ”.
Commercial Electronic Communications Process	Your Contact Details (Email Address, Telephone Number)	For the purposes of establishing commercial communication and managing communication processes within the scope of advertisements, notifications and	we process your data provided you give your “ explicit consent ”.

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		marketing activities	
	Your contact details (email address, telephone number) and Your Legal Transaction Information (commercial communication consent/refusal information, time and date of consent, method of communication (SMS, phone call, email))	For the purposes of conducting commercial communication authorisation processes in accordance with our legal obligations, monitoring and managing legal matters, and providing information to authorised persons, institutions and organisations via	We collect and process data on the legal basis of “it being necessary for the data controller to fulfil its legal obligations”.

3. PURPOSE OF TRANSFERRING PERSONAL DATA AND RECIPIENT GROUPS

Recipient Group to Which Data Will Be Transferred	Purpose of the Transfer	Legal Basis for the Transfer
Suppliers and Business Partners:	Data obtained by our company from suppliers on an outsourced basis, limited to the provision of services necessary for the performance of our company’s commercial activities (server, storage, archiving, mobile network services, hosting, IT support, legal and similar areas)	Based on the legal grounds that “ the processing of data is necessary for the legitimate interests of the data controller, provided that this does not infringe upon the fundamental rights and freedoms of the data subject ”,
Authorised Bodies and Organisations: consumer arbitration boards, courts, public prosecutors’ offices, law enforcement agencies, ministries and other authorised public bodies and organisations,	To fulfil our legal obligations regarding notifications, declarations and audits, to enable judicial/official correspondence, to conduct legal disputes and to exercise our legal rights, including the right to bring legal proceedings and the right of defence,	on the legal grounds that “ it is necessary for the data controller to fulfil its legal obligations ” and “ data processing is necessary for the establishment, exercise or defence of a legal claim ”,
Group Companies:	Due to the use of shared software and shared email servers within the Group Companies, and for the purposes of (loyalty card discounts, ticketing, transfers, and guide services),	we may transfer data on the legal grounds that “ the processing of data is necessary for the legitimate interests of the data controller, provided that this does not infringe upon the fundamental rights and freedoms of the data subject ”.

4. METHOD OF COLLECTING PERSONAL DATA

Your personal data;

- automatically via physical and/or electronic membership application forms, our website or mobile app when you submit your details,
- Through point-of-sale (POS) systems, online systems, hotel management systems and loyalty programme software, by automated means,
- By you submitting your personal data to us via the contact form on our website or social media channels, which is collected by semi-automated means.

5. YOUR RIGHTS UNDER THE LAW

As a data subject, you may contact us by post at the address “Merdivenköy Mah. Nur Sok. C Blok No:1, Inner Door No:26, Kadıköy/İstanbul” or by email at kvkk@maxxroyal.com regarding the rights you hold under Article 11 of the Act, which are explained in detail in our **Personal Data Processing and Privacy Policy** available on our website.

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