

ADESE GAYRİMENKUL YATIRIM A.Ş.
OUMU BEACH HOUSE

COOKIE POLICY (USE OF COOKIES)

ARTICLE 1: SCOPE, LEGAL BASIS, AND PRELIMINARY INFORMATION

This Cookie Policy contains essential information regarding the deployment and use of cookies and similar tracking devices installed on the terminal equipment and connection devices of our customers and users. In certain circumstances, the utilization of cookies may entail the processing of personal data; therefore, to obtain comprehensive information regarding how our customers' and users' personal data is processed, how you may exercise your statutory rights, and the definitions utilized to designate this platform, we recommend reviewing our Privacy Policy and the Statutory Privacy Notice (Aydınlatma Metni) accessible on our website.

This Cookie Policy (hereinafter referred to as the "Policy") sets forth the principles and procedures governing the use, processing purposes, and management of cookies and similar tracking technologies installed on the terminal connection devices (computers, smartphones, tablets, etc.) of our customers, guests, and users (hereinafter referred to as the "Data Subject" or "Relevant Person") who visit the website <https://oumubeachhouse.com/> (hereinafter referred to as the "Website" or the "Platform") operated by ADESE GAYRİMENKUL YATIRIM A.Ş. (hereinafter referred to as the "Company" or the "Operator"). Pursuant to Article 10 of the Law on the Protection of Personal Data No. 6698 (hereinafter referred to as the "LPPD"), the prevailing Guidelines on Cookie Applications issued by the Personal Data Protection Board, and the applicable consumer protection legislation, this Policy constitutes an indivisible part and an addendum to the Privacy and Payment Security Policy and the LPPD Statutory Privacy Notice published on the Website.

ARTICLE 2: WHAT IS A COOKIE AND WHAT DATA DOES IT CONTAIN?

Cookies are small text files consisting of letters and numbers stored on your device or network server via web browsers (e.g., Google Chrome, Safari, Mozilla Firefox, Opera) by the websites you visit. Cookies are generated by the servers associated with the website visited, thereby enabling the server to recognize the visitor upon subsequent visits to the same website.

Cookies do not contain direct personal identifiers pertaining to visitors, such as name, gender, or physical address, and solely contain information regarding your browsing history within the digital environment. Cookies are specific to the browser utilized to access the Platform and the device upon which said browser operates, and they may be erased or blocked from access by the user at any time.

The primary purpose of cookies is to improve your user experience on our website. Cookies assist in rendering our website more effective and secure. Cookies enable us to develop and optimize our website in alignment with visitor activities and preferences, thereby assisting visitors in locating desired content more expediently, remembering these selections upon subsequent visits, detecting user preferences, and highlighting corresponding products and services accordingly.

Data Subjects may freely determine their preferences, grant affirmative consent, or withdraw their consent at any time regarding the use of all cookies—strictly excluding necessary (mandatory) cookies—via the dynamic Cookie Information and Management Panel presented upon their initial entry to the Website. Implied, passive, or pre-ticked/default consent mechanisms are under no circumstances implemented on our Platform.

ARTICLE 3: TRANSMISSION CHANNELS AND THIRD-PARTY COOKIES

Cookies are transmitted directly by <https://oumubeachhouse.com/> (first-party cookies) and/or, where the visited page delivers third-party content such as embedded videos or photographs, by third-party providers via the data communication established during your browsing session between the browser installed on your device (such as Google Chrome, Safari, etc.) and the servers of the aforementioned entities.

During the delivery of certain embedded content and functionalities on the Website (video players, social media plug-ins, etc.), Third-Party Cookies—the proprietary ownership and technical control of which reside entirely with third-party providers (e.g., Google, YouTube, Meta)—may be deployed. The processing procedures applicable to data collected via these cookies are strictly subject to the respective privacy and cookie policies of said third-party entities. In this context, pursuant to the doctrine of the interruption of causation (break in the chain of causation), our Company bears no contractual, civil, criminal, or strict liability for any security vulnerabilities, data leaks, unauthorized access incidents, or unlawful data processing operations occurring within the software systems or servers of said third-party providers.

ARTICLE 4: PURPOSES OF COOKIE PROCESSING AND LEGAL GROUNDS

Strictly necessary cookies are processed within the scope of the legitimate interests of the data controller and for the explicit purpose of establishing and performing a contract. For all cookies beyond strictly necessary cookies, we rely exclusively upon your explicit consent when processing your personal data. Through the Cookie Management Panel, you may inspect the categories of cookies utilized on our website and adjust your preferences at any time for all cookies other than strictly necessary cookies.

Cookies are utilized on our website for multiple operational objectives, primarily including the following purposes:

1. Ensuring the flawless and secure functioning of the website (for example, ensuring that text, photographs, hyperlinks, and interactive elements are rendered in their proper positions);
2. Providing visitors with a more personalized, responsive, and engaging user experience (for example, presenting customized services tailored to your historical preferences);
3. Developing and optimizing the website's architecture (for example, identifying, debugging, and rendering functional any defective, broken, or underutilized web pages);
4. Remembering visitor preferences (for example, maintaining authentication credentials, language settings, and regional preferences entered upon accessing our Website);
5. Retaining visitor preferences regarding commercial products (for example, ensuring that an item added to your accommodation basket remains in the basket upon refreshing the browser page).

IP addresses and network traffic log records maintained on the Website's hosting servers for the detection of cyberattacks and the prevention of cybercrimes are entirely autonomous from cookie mechanisms and are preserved in segregated, secured databases pursuant to statutory obligations under Law No. 5651. Cookies shall under no circumstances be utilized for judicial, prosecutorial, or administrative surveillance activities.

Where users visiting the Platform decline analytical and targeting cookies—excluding strictly necessary (mandatory) cookies—via the preference panel, such refusal shall under no circumstances constitute an impediment to the performance of accommodation reservation services, nor shall it be invoked as a valid ground to restrict, degrade, or condition such hospitality services.

ARTICLE 5: CATEGORIES OF COOKIES DEPLOYED ON THE PLATFORM

5.1. Strictly Necessary (Mandatory) Cookies:

These cookies are indispensable for the operation of the website and cannot be switched off in our systems. They enable you to navigate the website and utilize core features corresponding to explicit service requests, such as configuring your privacy preferences, authenticating logins, or completing transactional reservation forms.

5.2. Performance and Analytical Cookies:

These cookies are utilized to enhance and optimize the operational mechanics of the website. They collect no information that directly identifies an individual visitor; all metrics are aggregated and processed anonymously. They incorporate telemetry regarding how visitors navigate the website (for example, whether visitors encounter error notifications on specific web pages).

5.3. Advertising and Targeting Cookies (Cookies Subject to Explicit Consent):

These cookies are utilized to construct a profile of your interests and deliver advertisements relevant to your personal preferences. Concurrently, they are deployed to assist in measuring the efficacy of advertising campaigns and to cap the frequency with which a specific advertisement is displayed. They are typically placed on advertising networks with the permission of the website proprietor. Information regarding your visits to the website and data contained within the cookie are shared with external advertisers and partner organizations. If you do not authorize these cookies, you will not experience our personalized and targeted advertisements across external third-party websites.

5.4. Functional Cookies:

These cookies enable the website to remember choices you make (such as your username, language preference, or the geographical jurisdiction in which you reside) and provide enhanced, customized functionalities. They may also be utilized to remember customizable modifications made to text size, typography, and other configurable interface elements. The information collected by these cookies may be kept confidential and cannot track your browsing activities across unrelated websites. If you do not authorize these cookies, some or all of these functional features may fail to operate properly.

ARTICLE 6: UTILIZATION OF TELEMETRY DERIVED FROM YOUR DEVICE

Furthermore, we utilize usage data pertaining to click frequency and pages viewed during your visits to articles, news, and other tabs on our website strictly for statistical purposes by anonymizing said metrics. You are under no obligation to accept cookies to navigate our website; provided, however, that in such case, the quality of your user experience may diminish. You may delete or block cookies; however, our website may consequently fail to function as intended. We do not process data collected via cookies for the purpose of re-identifying your personal identity. Cookies shall not be utilized for any purposes beyond those exhaustively set forth in this Policy, nor shall they be processed in contravention of personal data protection legislation.

ARTICLE 7: MANAGEMENT, BLOCKING, AND DELETION OF COOKIES

Visitors are entitled to personalize their cookie preferences by modifying the browser settings through which they view our website. If the browser currently in use affords such functionality, it is possible to amend cookie preferences directly via the browser settings. Accordingly, depending upon the technical features provided by your browser, you reserve the right to prevent cookie installation,

receive a notification prior to cookie placement, or selectively disable or delete specific cookies. It may be necessary to configure your cookie preferences separately for each distinct connection device through which you access the website. By utilizing the cookie settings tab in your active browser, you may adjust and save your preferences regarding our site. Furthermore, you may readjust your cookie preferences subsequently at any time.

While the deployment of cookies enables the Website to provide superior and seamless services, you may block the use of cookies at your sole discretion. Nevertheless, it must be noted that in such event, the site may fail to operate at full functionality and you may be precluded from utilizing all available features. To block cookies, you must alter the configuration settings of your internet browser. These configuration steps vary depending on the specific device and browser employed. Browser manufacturers provide dedicated support portals regarding cookie administration; for detailed guidance, please review the links set forth below:

- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=tr>
- Opera: <https://help.opera.com/en/latest/web-preferences/>
- Mozilla Firefox:
<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari: <https://support.apple.com/tr-tr/guide/safari/sfri11471/mac>

ARTICLE 8: ENFORCEABILITY AND AMENDMENTS

The provisions of this Policy may be modified, revised, or amended by the Company at any time as deemed necessary or in accordance with legislative and regulatory updates. The updated Policy shall enter into legal force immediately upon the date of its publication on the Website.