

ADESE GAYRİMENKUL YATIRIM A.Ş.
OUMU BEACH HOUSE

**STATUTORY PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
PURSUANT TO THE LAW ON THE PROTECTION OF PERSONAL DATA NO. 6698 (LPPD)**

ARTICLE 1: PURPOSE AND SCOPE OF THE STATUTORY PRIVACY NOTICE

This statutory privacy notice has been prepared pursuant to Article 10 of the Law on the Protection of Personal Data No. 6698 (hereinafter referred to as the "LPPD") and the Communiqué on the Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform (Veri Sorumlusuna Başvuru Usul ve Esasları Hakkında Tebliğ), in accordance with the profound importance attributed to personal data by ADESE GAYRİMENKUL YATIRIM A.Ş. "Oumu Beach House" Hotel Enterprise (hereinafter referred to as the "Company"), for the purpose of setting forth our Company's institutional approach and fulfilling our statutory obligation to inform our hotel guests and website users regarding the processing and protection of personal data.

The personal data encompassed within the scope of this Statutory Privacy Notice (hereinafter referred to as the "Notice") pertains to all personal data of the data subject processed by wholly or partly automated means, or by non-automated means provided that such processing forms part of a data filing system (veri kayıt sistemi).

ARTICLE 2: PROCESSED PERSONAL DATA AND THE PRINCIPLE OF PROPORTIONALITY

Within the scope of your accommodation and reservation procedures, your personal data that may be processed by our Company in full conformity with the principle of "being relevant, limited, and proportionate to the purposes for which they are processed" set forth under Article 4 of the LPPD, comprises the following categories:

a) Personal Data Disclosed by You to Our Company Subject to Processing:

- **Identity Data** : Name, surname, date of birth, gender, Republic of Türkiye Identity Number (TCKN) (or Passport Number and Nationality for foreign guests).
- **Contact Data** : E-mail address, mobile phone number, billing address, and official notification address.
- **Transaction Security Data** : IP address information, website network traffic log records, and cookie telemetry.
- **Accommodation and Service Preferences** : Reserved room category, dates of stay, check-in and check-out logs, on-premises consumption and tab records (Oumu Kitchen, Beach, Jetty/Pier, etc.), as well as preference and service requests voluntarily disclosed by the Customer to customize their hospitality experience.
- **Legal Transaction Data** : Information contained in official correspondence with competent persons, public institutions, and judicial authorities; legal information and records within potential complaint dossiers, lawsuits, mediation proceedings, and enforcement files.
- **Marketing and Communication Process Records** : Consents for commercial electronic messages, promotional campaign participation logs, survey submissions, and customer satisfaction evaluation records.

b) Transfer of Personal Data and Cross-Border Safeguards:

Your collected personal data may be transferred—for the purposes of administering Company operations, performing the hospitality contract, and fulfilling statutory obligations—to LORAS HOLDİNG A.Ş. and its Group Companies, our commercial business partners, suppliers, and legally authorized public authorities and organizations, within the framework of the conditions and grounds set forth under Article 8 of the LPPD.

In the event that the information technology infrastructures, cloud-based property management systems (PMS), reservation automation engines, or server hosting services deployed within our Company are located abroad; your personal data may be transferred to servers situated abroad subject to the contemporary and appropriate safeguards prescribed under Article 9 of the LPPD (specifically through the execution of Standard Contractual Clauses or the existence of an Adequacy Decision) and upon taking all requisite technical and administrative measures concerning data security.

c) Processing of Personal Data and Core Principles:

Our Company processes your personal data pursuant to Article 20 of the Constitution of the Republic of Türkiye and Article 4 of the LPPD, in adherence to the following fundamental principles:

1. Lawfulness and fairness;
2. Being accurate and kept up-to-date where necessary;
3. Being processed for specified, explicit, and legitimate purposes;
4. Being relevant, limited, and proportionate to the purposes for which they are processed;
5. Being retained for the period stipulated by applicable legislation or required for the purpose of processing.

Such processing is conducted based on one or more of the statutory legal grounds set forth under Article 5 of the LPPD. Pursuant to Article 20 of the Constitution and Article 10 of the LPPD, our Company fulfills its statutory obligation to inform during the collection of said personal data by providing clear disclosure regarding:

- The purposes for which personal data shall be processed;
- The recipients to whom and the purposes for which personal data may be transferred;
- The method and legal basis of collecting personal data; and
- The statutory rights vested in the data subject under the law.

d) Legal Grounds for the Processing of Personal Data:

Your personal data is processed by our Company on the legal ground that data processing is strictly mandatory for the legitimate interests pursued by our Company, provided that such processing does not prejudice or impair the fundamental rights and freedoms of the data subject, as stipulated under Article 5(2)(f) of the LPPD.

e) Purposes and Legal Grounds of Collecting Personal Data:

Your personal data is gathered in accordance with the aforementioned purposes through the completion and submission of the online contact form on our website, in order to deliver, develop, and administer the products and services we provide, conduct our commercial activities, and manage communication channels.

Personal data collected through these channels may likewise be processed within the scope of the personal data processing conditions and purposes set forth under Articles 5 and 6 of Law No. 6698, and for the purposes designated in paragraphs (b) and (c) of this Notice.

Specifically, your personal data is collected and processed based upon the following legal grounds and objectives:

- Processing is expressly stipulated in the laws;
- Processing is mandatory for our Company to fulfill its statutory and legal obligations;
- Processing is mandatory for the establishment, exercise, or protection of a legal right;
- Processing is mandatory for the legitimate interests of the data controller, without harming fundamental rights;
- The existence of explicit consent provided by you for the processing of your personal data;
- Executing the procedures required for the conclusion and performance of the contract executed between you and our Company;
- Executing and auditing financial and accounting operations;
- Conducting and auditing corporate business activities of the Company;
- Executing invoicing and billing workflows;
- Executing diverse marketing, advertising, and promotional campaigns;
- Presenting customized products and services tailored to your demands, tastes, and preferences;
- Managing prospective customer relationships and communication processes;
- Enhancing customer satisfaction;
- Recognizing our guests and conducting customer profiling analytics, as well as conducting operational development and improvement of the products and services offered by our Company;
- Carrying out strategic analysis studies;
- Administering corporate communications;
- Evaluating customer inquiries, suggestions, and complaints;
- Contacting you and providing necessary notifications regarding the status, terms, and modifications of contracts concluded via our platform pursuant to the relevant provisions of the Law on Consumer Protection and distance contracts legislation;
- Conducting guest demographic and market analyses, including administering electronic or physical questionnaires and surveys through contracted service providers;
- Evaluating customer feedback, requests, and grievances concerning our services;
- Facilitating the acquisition of product and accommodation information;
- Providing post-sales customer support services for goods and services;
- Administering enterprise information security and data integrity procedures;
- Ensuring full compliance of operational activities with applicable legislation;
- Conducting and following up on legal affairs, proceedings, and litigation;
- Furnishing mandatory disclosures and reports to authorized persons, public authorities, and judicial bodies.

f) Transfer of Personal Data:

The Company may transfer said personal data—solely based on your explicit consent, or within the domestic territory subject to adequate safeguards under the statutory security and confidentiality principles set forth in the Law, or abroad subject to the adoption of requisite security safeguards—for the purposes of conducting Company operations, managing and executing the business relationship between data subjects and our customers, offering services, opportunities, and privileges, and enhancing overall service quality, to:

Business partners of LORAS HOLDİNG A.Ş. and its Group Companies, contracted clients and suppliers to whom we render or from whom we receive services as necessitated by our business operations, service providers, independent audit institutions, public institutions or administrative bodies legally authorized to demand such data by operation of law, domestic and foreign servers utilized by the Company, domestic cloud service hosting institutions, advertising and public relations agencies, courier and postal operators, and relevant legal authorities, without limitation, strictly within the framework of the data processing conditions set forth under Articles 8 and 9 of the LPPD.

Your personal data may be transferred to domestic or overseas servers and cloud infrastructure vendors pursuant to Article 9 of the LPPD strictly upon obtaining your explicit consent.

g) Data Retention, Statutes of Limitations, and Disposal Policy:

Our Company retains your processed personal data throughout the mandatory statutory retention periods prescribed under all applicable legislation, primarily including the Turkish Commercial Code No. 6102, the Tax Procedure Law No. 213, the Identity Reporting Law No. 1774, and the Turkish Criminal Code No. 5237.

Where no definitive retention period is expressly designated under the law, your data shall be preserved for the duration necessitated by the processing purposes and until the expiration of the statutory limitation periods (statutes of limitations), including peremptory forfeiture periods, to enable our Company to exercise its freedom to seek legal remedies, assert its right of defense, and respond to potential legal, administrative, or criminal proceedings arising from contractual or statutory obligations.

When the legal grounds and legitimate interest criteria necessitating data processing under the LPPD cease to exist in their entirety and upon the expiration of the aforementioned statutory limitation periods, your personal data shall be erased, destroyed, or anonymized ex officio (resen) during the first periodic disposal cycle, or upon the duly served request of the data subject, pursuant to the provisions of the Regulation on the Deletion, Destruction or Anonymization of Personal Data (Official Gazette No. 30224) and the Company's Data Destruction Policy.

ARTICLE 3: RIGHTS OF THE DATA SUBJECT

Pursuant to Article 20 of the Constitution of the Republic of Türkiye, everyone has the right to be informed about personal data concerning them; and Article 11 of the LPPD sets forth that the right to "request information" constitutes a fundamental entitlement of the data subject.

As a data subject, we hereby notify you that you are vested with the following statutory rights pursuant to Article 11 of the LPPD:

1. To learn whether your personal data is being processed;
2. To request information if your personal data has been processed;
3. To learn the purpose of processing your personal data and whether it is being used in accordance with said purpose;
4. To know the third parties to whom your personal data is transferred domestically or abroad;
5. To request the rectification of your personal data if it has been processed incompletely or inaccurately, and to request that the transaction performed within this scope be notified to the third parties to whom the personal data has been transferred;
6. To request the erasure or destruction of your personal data in the event that the reasons requiring its processing cease to exist—notwithstanding that it has been processed in accordance with the LPPD and other applicable statutory provisions—and to request that the action taken hereunder, as well as actions taken regarding rectification, be notified to the third parties to whom your personal data has been transferred;
7. To object to any result that operates to your detriment arising exclusively from the analysis of your processed data via automated systems;
8. To demand compensation for damages in the event that you incur loss or harm due to the unlawful processing of your personal data.

Application Procedure and Exercise of Rights:

You may submit your requests regarding your aforementioned rights pursuant to the provisions of the

Communiqué on the Principles and Procedures for the Request to Data Controller:

- In writing with original wet-ink signature;
- Via a Registered Electronic Mail (KEP) address;
- Via secure electronic signature or mobile signature; or
- Electronically through your e-mail address previously communicated to our Company and registered in our data systems, accompanied by official identity-authenticating information and documents (Republic of Türkiye Identity Number or Passport Number for foreign nationals, registered domicile/workplace address for notification purposes, mobile phone/telephone/fax numbers, e-mail address, etc.) to enable our Company to conclusively ascertain that you are the authentic right-holder.

You may submit such requests by downloading and completing the Data Subject Application Form accessible at:

https://admin.adese.com.tr/App_Assets/MediaManager/veri-sahibi-basvuru-ve-bilgi-talep-formu.pdf

or through the official channels designated on said form in conformity with the relevant legislation.

Your applications shall be resolved free of charge as expeditiously as possible and within **thirty (30) days** at the latest, depending on the nature of the request; provided, however, that if the transaction necessitates an additional operational cost, a fee may be charged in accordance with the statutory tariff established by the Personal Data Protection Board. In order for a third party to submit an application on behalf of a data subject, such person must possess a special power of attorney (özel vekâletname) duly executed and notarized specifically for this matter by the data subject. Duly submitted requests shall be finalized within thirty days at the latest. Where the finalization of such requests incurs an additional expenditure, our Company shall charge the applicant the fee prescribed under the Board's tariff.

You may transmit this form by downloading it via the link provided above to:

Postal Address:

ADESE GAYRİMENKUL YATIRIM A.Ş.

Musalla Bağları Mah. Kule Cad. Selçuklu Kulesi Sit. No: 2/55 SELÇUKLU/KONYA

Telephone: +90 332 221 40 00 | +90 332 221 42 42

or via e-mail to: info@adese.com.tr / info@oumubeachhouse.com.

You may contact us regarding any inquiries, proposals, or legal requests:

Commercial Title: ADESE GAYRİMENKUL YATIRIM A.Ş.

MERSIS No: 0007006398900013

Telephone Numbers: +90 332-221-40-00 | +90-332-221-42-42

Postal Address: Musalla Bağları Mahallesi | Kule Caddesi Selçuklu Kulesi Sitesi | Kat:33 No:2 İç Kapı No:55 | Selçuklu 42060 | KONYA TÜRKİYE

Fax: 90 332 221 42 35

Official Website: <https://www.adese.com.tr/>

E-mail Address (Data Protection Inquiries): info@adese.com.tr

ARTICLE 4: COMMERCIAL ELECTRONIC MESSAGE INFORMATION AND CONSENT NOTICE

Pursuant to the Law on the Regulation of Electronic Commerce No. 6563 and the Regulation on Commercial Communication and Commercial Electronic Messages; all messages containing data, voice,

or video content transmitted for commercial purposes in digital media utilizing channels such as telephone, call centers, facsimile machines, automated dialing machines, smart voice recording systems, electronic mail, and short message services (SMS) are deemed **commercial electronic messages**.

Commercial electronic messages may be dispatched to recipients strictly upon securing their prior affirmative opt-in consent. Recipients reserve the statutory right to refuse and opt out of receiving commercial electronic messages at any time, without stating any reason whatsoever. Even if you have previously granted consent to receive commercial electronic messages, you may revoke your consent at any time by sending an e-mail to **info@adese.com.tr / info@oumubeachhouse.com** or by placing a call to **+90 332-221-40-00 | +90-332-221-42-42 | +90 530 178 02 96**.

Having been fully informed that commercial electronic messages may be dispatched to me by **Adese Gayrimenkul Yatırım A.Ş. (Oumu Beach House Hotel Enterprise), Loras Holding A.Ş.**, and their Group Companies via Short Message Service (SMS), Multimedia Messaging Service (MMS), electronic mail, letter, telephone, call center, automated outbound dialers, WhatsApp, and similar internet messaging applications within the scope of promotional campaigns, discounts, product, service, and event promotions, corporate announcements, and sales/satisfaction questionnaires; I hereby acknowledge that I may refuse or revoke the consent granted hereunder at any time and free of charge, that upon serving such opt-out notice the dispatch of commercial electronic messages to me shall cease immediately, and that my consent records shall be preserved and logged on the central **Commercial Electronic Message Management System (İYS)**.

ADESE GAYRİMENKUL YATIRIM A.Ş.

MERSIS No : 0007006398900013

Telephone : +90 332-221-40-00 | +90-332-221-42-42

Address : Musalla Bağları Mahallesi | Kule Caddesi Selçuklu Kulesi Sitesi | Kat:33 No:2 İç Kapı No:55 | Selçuklu 42060 | KONYA TÜRKİYE