

**THE DISCLOSURE TEXT COMPILED PURSUANT TO THE LEGISLATION ON PROTECTION OF THE
PERSONAL DATA
(THIRD PARTIES)**

As Akfen Turizm Yatırımları ve İşletmecilik Anonim Şirketi (the "Company"), we attach great importance to ensuring security of your personal data. In this context, in the processes of processing your personal data and transferring your personal data to third parties in accordance with the Law No.6698 on Protection of the Personal Data ("KVKK"), we are adopting necessary measures for the sake of ensuring adequate level of security as required to prevent your personal data from being processed illegally and to prevent unlawful access to your personal data and to ensure protection of your personal data. For this reason, this Disclosure Text (the "Disclosure Text") has been prepared to inform the relevant persons.

In the event where all or certain articles of the Disclosure Text issued by the company are renewed, this Disclosure Text shall be updated accordingly.

Data Controller

Our company is the legal entity that determines the intended purposes and means of processing your personal data, and is responsible for establishment and management of the data recording system. Our Company shall ensure security of the data and then start processing your personal data after obtaining your explicit consent for processing of your personal data or by serving the information notice in cases where your explicit consent is not required. When processing your personal data, we may also authorize one or several data processors and have such data processors to process your personal data by securing the required level of security.

Processed Personal Data

DATA CATEGORIZATION	DESCRIPTION
IDENTITY	Information such as name surname, mother and father's name, mother's maiden surname, date of birth, place of birth, marital status, identity card serial and pos. number, National identity number, etc.
CONTACT INFO	Information such as address, address number, e-mail address, contact address, registered electronic mail address (KEP), telephone number, etc.
FINANCE	Information such as the balance sheet information, Financial performance information, Credit and risk information, Asset information, etc.
RISK MANAGEMENT	Information such as the data processed to manage commercial, technical and administrative risks.
LEGAL ACTION	Information in the correspondence with judicial authorities, information in the case file, information in the execution file, etc.
PROCESS SECURITY	Information such as the IP address information, Internet site login and logout information, Password information, etc.
VISUAL AND AUDIO RECORDS	Photograph, camera recording, sound recording and other visual and audio recordings.
PHYSICAL SPACE SECURITY	The data such as entrance to the workplace, recording information, camera records, etc.

The purposes of processing your personal data

Your personal data shall be used for the purpose of delivery of the services to be performed by our Company in accordance with the provisions of the applicable legislation and to improve the quality of such services; to be able to carry out the operations, the activities of the Company as stipulated and/or deemed as exceptions by the public authorities, to comply with the information storage, reporting, and disclosure obligations, and to execute human resources processes.

Furthermore, any one/several or all of your personal data can be processed for the purpose of delivery of the services related to the scope of activity of our company, visiting our Company, protecting the security and legitimate interests regarding your visit, offering the products and services of our company, communicating about the product and service you received/will receive, modeling, reporting, scoring, risk monitoring, etc., and to improve the quality of such services and to be able to fulfill other activities and to comply with disclosure obligations.

In the following cases, your Personal Data can be processed by the Company with the capacity of the Data Controller even without your explicit consent in this respect:

- a) If stipulated explicitly in the laws,
- b) If mandatory for protection of the life or physical integrity of the person or someone else who is unable to disclose his/her consent due to the actual impossibility or whose consent is not legally valid,
- c) If it is necessary to process the personal data belonging to the parties of the contract, provided that such data is directly related to establishment or performance of any contract,
- d) If it is mandatory for the data controller to fulfill his legal obligation,
- e) If made public by the data subject in person,
- f) If processing of the data is mandatory for establishment, exercise or protection of any right, and
- g) If processing of the data is mandatory for the legitimate interests of the data controller, on the condition not to harm the fundamental rights and freedoms of the data subject.

Transfer of your Personal Data

Your personal data so collected can be transferred to our employees, the executives, group executives, group employees, the business partners, the suppliers (the entities from whom goods and/or services are procured, including the consultants), the shareholders, legally authorized public institutions and private persons for the purposes set forth above pursuant to the personal data processing conditions and purposes specified in articles 8 and 9 of the KVKK.

Acquisition of your Personal Data

Your personal data can be acquired in verbal, written or electronic media in accordance with the provisions of the applicable legislation with the help of our website, social media channels and all other channels by means of our company, our employees, subsidiaries, group companies, affiliates, business partners and employees thereof.

This Disclosure Text is enclosed to and forms an integral part of all contracts and commitments you have signed with and the requests you have submitted to our Company.

Destruction of your Personal Data

Our company stores your processed personal data for the periods as set out by the legislation. However, if the legislation specifies no retention period regarding storage of your personal data, then your personal data are stored for the period as required for processing the data in accordance with our Company's practices and commercial practices depending on the purposes of our Company in processing such data, and after expiry of such period, only for the periods demonstrated in practice to be necessary for the purpose of constituting evidence in possible legal disputes. After expiry of the specified periods, your personal data in question are deleted, destroyed or anonymized on the first destruction date in accordance with Article 7 of the KVKK.

Your Rights Regarding Processing of your Personal Data

Your rights regarding processing of your Personal Data are as listed in Article 11 of the KVKK, and comprises of the following:

- a. Learning whether your personal data is being processed,
- b. If your personal data has been processed, requesting information regarding such processing,
- c. Learning the purpose of processing your personal data and whether such data is used appropriately for the intended purpose,
- d. Learning the third parties to whom your personal data has been transferred domestically or abroad,
- e. Requesting correction of your personal data if the data is incomplete or processed incorrectly, and requesting notification of the corrections made in this respect to the third parties to whom the personal data might have been transferred.
- f. Despite being processed in accordance with the provisions of the KVKK and other applicable laws, in the event where the grounds that require processing of the data are no longer available, requesting deletion, destruction or anonymization of your personal data and requesting notification of such actions made in this respect to the third parties to whom the personal data might have been transferred,
- g. Filing objection to emergence of any outcome against you by analyzing your processed data exclusively through automated systems,
- h. Requesting compensation in case you suffer damages due to unlawful processing of your personal data.

If you, as the personal data subject, submit your request regarding the rights to the Company through the methods as set out hereunder, our Company shall finalize the request free of charge as soon as possible and within thirty days at latest depending on the nature of the request. If, however, any fee is stipulated by the Personal Data Protection Board, the fee specified in the tariff shall be charged to the applicant by the Company. In this respect, the personal data subjects can communicate their request regarding exercise of your rights set out above as per paragraph 1 of article 13 of the KVKK either in written or via other methods as set forth by the Personal Data Protection Board. The channels and procedures for communicating your application in written are disclosed hereunder.

In order to exercise the rights as set forth above, you can submit your request that includes your remarks regarding your right you intend to exercise from your rights as set out in article 11 of the KVKK as well as the information documenting your credentials by filling out the form available on our web site (www.bodrumloft.com.tr) and by submitting signed copy of the form in person to the address: Kazım Özalp Mahallesi Koza Caddesi No: 22 Çankaya Ankara together with your credentials, or send your request via notary public or by employing other methods as specified in the KVKK, or send the relevant form to akfen.turizm@hs03.kep.tr using secure electronic signature.

The company may reject the application of the applicant in the following cases by providing justification:

- Processing of the personal data for purposes such as research, planning and statistics by anonymizing such data with official statistics.
- Processing of the personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, on the condition not to violate the national defense, national security, public security, public order, economic security, privacy of private life or personal rights, or not to constitute any criminal act.
- Processing of the personal data within the scope of preventive, protective and intelligence operations carried out by public institutions and organizations authorized by the law to ensure national defense, national security, public security, public order or economic security.
- Processing of the personal data by judicial authorities or execution authorities in relation to any investigation, prosecution, trial or execution proceedings.
- If processing of the personal data is necessary for prevention of any criminal activity or for any criminal investigation.
- Processing of the personal data made public by the personal data subject in person.
- If processing of the personal data is necessary for execution of supervisory or regulatory duties and for disciplinary investigation or prosecution by the authorized and competent public institutions and organizations and public professional organizations on the basis of the authority vested by the law.
- If processing of the personal data is necessary for protection of the economic and financial interests of the State regarding budget, tax and financial issues.
- If the personal data subject's request might hinder the rights and freedoms of other persons.
- If the requests made require exertion of disproportionate effort.
- If the information so requested is already in public domain.

Our company shall respond to your request either in writing or in electronic format. In the event that your application is rejected in accordance with Article 14 of the KVKK, if you consider the response provided by our company to be insufficient, or if no response is provided for your application within due time, you can file complaint to the Board within 30 (thirty) days from the date you received the response of our company, or in case we do not respond, within 30 (thirty) days from expiry of the response period, and in any case, within 60 (sixty) days from the date of application.