

## SETUR MARINAS PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF CUSTOMERS

Your personal data may be processed by Setur Marinas; Tek-Art Kalamış ve Fenerbahçe Marmara Turizm Tesisleri A.Ş., Setur Antalya Marina İşletmeciliği A.Ş., Setur Yalova Marina İşletmeciliği A.Ş., Ayvalık Marina ve Yat İşletmeciliği Sanayi Ticaret A.Ş., Netsel Turizm Yatırımları A.Ş., Makmarin Kaş Marina İşletmeciliği Turizm ve Ticaret A.Ş. and Mytilini Marina Societe Anonyme ("**Setur Marinas**") as data controllers in accordance with the Personal Data Protection Law No. 6698 (the "**Law**").

Setur Marinas' Personal Data Protection and Processing Policy ("Policy"), which is published publicly at the address of, contains detailed information on the processing of your personal data by Setur Marinas.

### Purposes for Processing Personal Data

Your personal data collected will be processed for the purposes below ("**Purposes**") within the personal data processing grounds and purposes stipulated in Article 5 of the Law.

- Updating and verifying the customer information,
- Management of sales records and billing operations,
- Due to your purchase of Setur Marinas' products and services, the establishment or execution of sales or service contracts,
- Providing assistance to customers,
- Responding to demands from official authorities,
- Informing the authorized agencies due to the legislative obligations,
- Ensuring that the storage requirements outlined in the Act are met,
- Conducting the evaluations of the applications you convey to the Company, based on exercising your rights stipulated in Article 11 of the Law regarding your personal data that are processed by our Company, finalizing these applications according to the legislations and conducting the necessary processes in this regard,
- Management of customer relations,
- Carrying out financial transactions,
- Management of events,
- Execution of processes by our business units and management of the essential business procedures for the data subjects to benefit from Setur Marinas' goods and services, including sales and marketing operations for such products and services,
- Carrying out the necessary processes by our business units to execute Setur Marinas' commercial activities and to carry out the corresponding business procedures,
- Ensuring Setur Marinas' employees' or business partners' legal, technical, and commercial-occupational security,
- Developing and executing Setur Marinas' commercial and business strategies,
- Carrying out legal processes,
- Carrying out information technologies processes,
- Management of audits and ethics activities,
- Planning and execution of customer satisfaction and corporate communication initiatives,
- Organizing draws, campaigns, competitions, promotions, or other forms of advertising,
- Retention of personal data for the duration of the general statute of limitations so that it can be used as evidence in possible future conflicts,
- Receiving, assessing, and resolving your requests and complaints,
- If you have given your explicit consent, your identity, communication, customer transaction, and marketing data may be processed by Setur Marinas to execute Setur Marinas' product and services' marketing processes, including profiling and analysis activities, and for the purposes of tailoring and suggesting the goods and services provided by Setur Marinas,

- If you have given your explicit consent, your identity and contact information may be processed for sending commercial electronic messages such as advertisements, promotions and campaigns.

### **Recipient Parties and Purposes for Transferring Personal Data**

Your personal data collected for the above-mentioned Purposes may be transferred to our business partners, suppliers, and legally authorized public institutions and legally authorized private persons in case it is expressly stipulated in the laws and for fulfillment of our legal obligations, in accordance with the rules regarding the transfer of personal data specified in Article 8 of the Law and within the framework of the personal data processing conditions specified in Article 5 of the Law.

### **Method and Legal Grounds for the Collection of Personal Data**

Your personal data may be collected by and via filling out online participation forms/contact forms/application forms, call center, mobile applications, text messages, e-mails in the electronically and via meetings with Setur Marinas in person and forms physically.

Your personal data may be collected and processed by Setur Marinas for the following purposes and legal grounds, based on the personal data processing conditions specified in Article 5 of the Law.

***Based on the legal ground that processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract;***

- Updating and verifying the customer information,
- Management of sales records and billing operations,
- Due to your purchase of Setur Marinas' products and services, the establishment or execution of sales or service contracts,
- Providing assistance to customers.

***Based on the legal ground that it is expressly provided by the laws and necessity for the fulfillment of the legal obligation to which the data controller is subject to;***

- Responding to demands from official authorities,
- Informing the authorized agencies due to the legislative obligations,
- Ensuring that the storage requirements outlined in the Act are met,
- Conducting the evaluations of the applications you convey to the Company, based on exercising your rights stipulated in Article 11 of the Law regarding your personal data that are processed by our Company, finalizing these applications according to the legislations and conducting the necessary processes in this regard.

***Based on the legal ground of data processing being mandatory for the legitimate interests of the data controller, provided that this processing does not violate the fundamental rights and freedoms of the data subject;***

- Management of customer relations,
- Carrying out financial transactions,
- Management of events,
- Execution of processes by our business units and management of the essential business procedures for the data subjects to benefit from Setur Marinas' goods and services, including sales and marketing operations for such products and services,
- Carrying out the necessary processes by our business units to execute Setur Marinas' commercial activities and to carry out the corresponding business procedures,
- Ensuring Setur Marinas' employees' or business partners' legal, technical, and commercial-occupational security,
- Developing and executing Setur Marinas' commercial and business strategies,
- Carrying out legal processes,

- Carrying out information technologies processes,
- Management of audits and ethics activities,
- Planning and execution of customer satisfaction and corporate communication initiatives,
- Organizing draws, campaigns, competitions, promotions, or other forms of advertising.

***Based on the legal ground that data processing is mandatory for the establishment, exercise, or protection of a right;***

- Retention of personal data for the duration of the general statute of limitations so that it can be used as evidence in possible future conflicts,
- Receiving, assessing, and resolving your requests and complaints.

***Based on your explicit consent;***

- Your identity, communication, customer transaction, and marketing data may be processed by Setur Marinas to execute Setur Marinas' product and services' marketing processes, including profiling and analysis activities, and for the purposes of tailoring and suggesting the goods and services provided by Setur Marinas,
- Your identity and contact information may be processed for sending commercial electronic messages such as advertisements, promotions and campaigns.

**Data Subject's Rights Specified under the Article 11 of the Law**

In relation to your personal data, you are entitled to the following rights, set forth under Article 11 of the Law:

- To learn whether your personal data are being processed,
- To request information if your personal data have been processed,
- To learn the purpose of the processing of your personal data and whether they have been used accordingly,
- To learn which third parties domestic or abroad your personal data has been transferred to,
- To request rectification in case your personal data has been processed incompletely or inaccurately and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
- To demand the erasure or destruction of your personal data in the event that the reasons for the processing no longer exist even though it was processed in accordance with the Law and other relevant provisions and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
- To object to negative consequences to you that are concluded, as a result of analysis of the processed personal data through solely automatic systems,
- To demand compensation for the damages that you have suffered as a result of unlawful processing of your personal data.

You may convey your requests concerning your rights listed above to our Company, by filling out the Data Subject Application Form, which can be found at. Depending on the nature of your request, your application will be concluded, as soon as possible, within 30 days at the latest, and in principle, free of charge. However, if the process requires additional costs, a fee may be demanded according to the tariff determined by the Personal Data Protection Board.

**SETUR MARINAS CUSTOMER EXPLICIT CONSENT FORM REGARDING THE  
PROCESSING OF PERSONAL DATA AND COMMERCIAL ELECTRONIC MESSAGES**

In scope of the [Customer Privacy Notice](#); do you agree for processing of your identity, communication, customer transaction, and marketing data by [Setur Marinas](#) for the purposes of marketing of Setur Marinas' product and services, including profiling and analysis activities, tailoring and suggesting the goods and services provided by Setur Marinas and for the purposes of sending you commercial electronic messages such as advertisements, promotions and campaigns and sharing your data with for this purposes with the third parties whose services are used?

Yes;

SMS

E-Mail

Call

No;

**SETUR MARINAS CUSTOMER EXPLICIT CONSENT FORM REGARDING THE  
PROCESSING OF PERSONAL DATA AND COMMERCIAL ELECTRONIC MESSAGES**

In scope of the [Customer Privacy Notice](#); do you agree for processing of your identity, communication, customer transaction, and marketing data by Tek-Art Kalamış ve Fenerbahçe Marmara Turizm Tesisleri A.Ş., Setur Antalya Marina İşletmeciliği A.Ş., Setur Yalova Marina İşletmeciliği A.Ş., Ayvalık Marina ve Yat İşletmeciliği Sanayi Ticaret A.Ş., Netsel Turizm Yatırımları A.Ş., Makmarin Kaş Marina İşletmeciliği Turizm ve Ticaret A.Ş. and Mytilini Marina Societe Anonyme companies ("**Setur Marinas**") as data controllers for the purposes of marketing of Setur Marinas' product and services, including profiling and analysis activities, tailoring and suggesting the goods and services provided by Setur Marinas and for the purposes of sending you commercial electronic messages such as advertisements, promotions and campaigns and sharing your data with for this purposes with the third parties whose services are used?

Yes;

SMS

E-Mail

Call

No;