

1. PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Introduction

This text has been prepared to inform individuals making reservations, accommodating guests, and customers utilizing the restaurant, meeting, organization, parking, and other hotel services regarding their personal data.

You can access detailed information regarding camera systems and website cookies via the "Camera Recording Systems Privacy Notice" and "Cookie Policy" available at www.ramadaduzce.com.

Data Controller

Pursuant to Article 10 of the Personal Data Protection Law No. 6698 ["KVKK"], Düzce Coşkun Mühendislik Ltd. Şti. ["Hotel"], the operator of the Ramada By Wyndham Düzce establishment, is the data controller.

- **Trade Name:** Düzce Coşkun Mühendislik Ltd. Şti.
- **MERSIS Number:** 0323 0471 8200 0013
- **Address:** Kültür Mah. Akasya Sk. No:12 81010 - Merkez/Düzce - Türkiye
- **Telephone:** +90 444 95 81
- **E-mail:** info@ramadaduzce.com
- **KEP Address:** duzcecoskunmuhendislik@hs02.kep.tr
- **Website:** www.ramadaduzce.com

Processed Personal Data, Purposes, and Legal Reasons

Process	Processed Data	Processing Purpose	Legal Reason
Reservation and accommodation services	Name-surname, contact information, reservation number, accommodation dates, number of rooms and persons, room/service preferences, license plate, reservation communication records	Creating and verifying reservations, contacting the guest, check-in/out procedures, providing accommodation, parking, and other requested services	KVKK Art. 5/2-c: Necessary for the establishment or performance of a contract
Identity declaration	Name-surname, TR ID number or passport/ID number, nationality, place and date of birth, arrival-departure details, signature, accommodation document information prescribed by legislation	Issuing accommodation documents, verifying identity, and notifying law enforcement agencies	KVKK Art. 5/2-a and ç: Explicitly stipulated in the Identity Declaration Law No. 1774 and fulfillment of legal obligations
Payment and billing	Billing information, tax ID or TR ID number where necessary, transaction amount, payment method, bank transaction/reference info, masked card details	Managing payments, pre-authorizations, refunds, billing, accounting, and payment disputes	KVKK Art. 5/2-a, c, ç, and e: Prescribed by law, performance of contract, legal obligation, and protection of rights

Guest relations	Requests, complaints, suggestions, correspondence, used services, extra expenses, damage/incident records, and lost property information	Fulfilling requests, resolving complaints, conducting services, delivering lost items, and managing disputes	KVKK Art. 5/2-c, e, and f: Performance of contract, protection of rights, and legitimate interest of the Hotel
Information & transaction security	IP address, access/system logs, transaction time, reservation/user movements, security incident records	Ensuring info system security, preventing unauthorized transactions/abuse, auditing transaction logs	KVKK Art. 5/2-ç, e, and f: Legal obligation, protection of rights, legitimate interest
Special service requests	Voluntarily provided allergy, health, disability, or accessibility info, and explicit religion/belief info indicating special service requests	Providing requested special services, taking precautions, protecting guest's life/physical integrity	Explicit consent per KVKK Art. 6/3-a; KVKK Art. 6/3-c if consent cannot be declared due to physical impossibility; KVKK Art. 6/3-d for establishment/ protection of a legal right
Marketing and personalization	Name-surname, phone, e-mail, communication permissions, campaign interactions, preferences saved for future stays	Sending campaigns/offers, personalizing future services, creating customer profiles	Separate explicit consent under KVKK Art. 5/1; KVKK Art. 5/2-a and ç for keeping consent/ rejection logs
Legal processes	Dispute, warning, lawsuit, enforcement, audit, and official correspondence information	Fulfilling legal obligations, exercising legal rights, and meeting requests of authorized authorities	KVKK Art. 5/2-a, ç, and e

The Hotel examines TR ID documents solely to verify the accuracy of information and does not save copies or images of them. Furthermore, the CVV/CVC security code of payment cards is not stored by the Hotel.

Method of Personal Data Collection

Personal data is collected wholly or partly by automated means, or by non-automated means as part of a data recording system, via the website and reservation forms, e-mail, phone, reception and accommodation documents, payment terminals, reservation systems, customer service records, and other hotel service points.

Data may also be obtained through the person making the reservation, travel agencies, online reservation platforms, tour operators, event companies, or corporate clients. If data is not obtained directly from the data subject, information is provided during the first contact or at the latest during check-in.

Transfer of Personal Data

Pursuant to Article 8 of the KVKK and limited to the purposes explained above, personal data may be transferred to:

- The General Directorate of Security, Revenue Administration, courts, prosecutors, and other authorized public institutions for identity declaration and legislative obligations,
- Banks and payment service providers for payment and refund transactions,
- The relevant agency, tour operator, online platform, or corporate client for managing reservations made through them,

- Domestic service providers for carrying out reservations, IT, local server/hosting, technical support, and archiving services,
- Lawyers, financial advisors, auditors, and (if necessary) insurance companies for legal and financial processes,
- Cargo or courier companies for sending lost items upon guest request,

limited only to necessary and relevant data.

Retention and Destruction

Personal data is retained for the periods prescribed in the relevant legislation and as long as necessary for the processing purpose. Upon expiration, data is deleted, destroyed, or anonymized under KVKK Article 7. Detailed retention periods are available in the "Personal Data Retention and Destruction Policy" at www.ramadaduzce.com.

Data Subject's Rights and Application

You may submit your requests regarding your rights under Article 11 of the KVKK to the Hotel in Turkish, along with identifying information, via:

- Delivering a wet-signed petition in person or via notary to the Company's address,
- Sending from your KEP address to duzcecoskunmuhendislik@hs02.kep.tr,
- Sending an e-mail with a secure electronic or mobile signature to info@ramadaduzce.com.

Applications are concluded as soon as possible and within thirty days at the latest. If the process requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board may be charged.

2. OUR PERSONAL DATA PROTECTION POLICY

Definitions

Terms used within the scope of this policy ["Policy"] shall have the following meanings:

- **Hotel / Data Controller:** The natural or legal person determining the purposes and means of processing personal data, responsible for the data recording system. Here, Düzce Coşkun Mühendislik Ltd. Şti.
- **Data Processor:** The natural or legal person processing personal data on behalf of the data controller.
- **Data Subject / Natural Person:** Guests, loyalty program members, visitors, employee candidates, suppliers, subcontractor personnel, and all other natural persons whose data is processed.
- **Recording Medium:** Any medium where personal data is processed wholly or partly automatically or non-automatically as part of a data recording system.
- **Site:** The ramadaduzce.com website.
- **Law No. 1774:** Identity Declaration Law No. 1774.
- **Law No. 5651:** Law on the Regulation of Broadcasts via Internet and Prevention of Crimes Committed through Such Broadcasts.
- **Law No. 6698 / KVKK:** Personal Data Protection Law.

- **Board:** Personal Data Protection Board.

Scope and Purpose of the Policy

This Policy delineates the boundaries of the data processing activities carried out by the Hotel as a data controller and transparently explains:

- Methods and legal grounds for collecting personal data.
- Data subject categories and types of personal data processed.
- Technical and administrative measures taken to ensure data security.
- Mechanisms for transferring personal data to domestic and foreign third parties.
- Data retention and periodic destruction periods.
- Rights of data subjects and application methods.

a. Methods and Legal Grounds for Collecting Personal Data

The Hotel collects personal data via websites, reservation forms, call centers, e-mails, travel agencies, online platforms, reception procedures, payment systems, loyalty applications, surveys, Wi-Fi portals, security cameras, visitor logs, and authorized public institutions. Data is collected directly from the data subject or legally from third parties.

b. Data Subject Groups

The Policy covers potential/current/former guests, daily service users, accompanying persons, child guests, persons making reservations/payments on behalf of others, cardholders, loyalty members, website/Wi-Fi users, physical visitors, employees, candidates, interns, their families, supplier/subcontractor representatives, company partners, and other contacting natural persons.

c. Data Categories and Sample Data Types Matrix

Data Subject Group	Sample Data Types
1. Guests, Potential Guests and Accompanying Persons	Identity (name, TR ID, passport, nationality, birth date, signature); contact (phone, e-mail, address); customer transaction (reservation, room, in-out, preferences); finance (billing, folio, masked card); legal action (requests, complaints); physical security (camera, license plate). ID copy is not saved.
2. Special Category Guest Data	Allergies, health, disability, medical needs, and explicitly stated religious dietary requirements (if provided and necessary for service).
3. Reserver, Payer or Cardholder	Identity and contact info, relationship to reservation, payment method, masked card info, and transaction reference.
4. Website and Wi-Fi User	IP/MAC address, device/browser info, connection time/duration, security logs, cookie IDs, contact/reservation form details.
5. Physical Visitor	Name-surname, visited person/unit, entry-exit time, license plate, camera footage.
6. Supplier / Subcontractor / Official	Name, TR ID, phone, e-mail, KEP, IBAN, tax info, signature circular, registry gazette, health report/criminal record for field workers, SGK payroll.

7. Employee and Employee Candidate	Identity, contact, personnel, education, professional experience, reference, physical security data; health and criminal records if legally required.
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d. Purposes of Processing Personal Data

Data is processed for operational, legal, and commercial purposes such as managing reservations, check-in/out, instant identity notification to law enforcement, finance/accounting processes, guest relations/complaints, physical space security, Wi-Fi logging per Law No. 5651, loyalty programs, marketing (with explicit consent), and managing supplier contracts.

e. Technical and Administrative Measures for Data Security

Technical Measures: Access authorization, secure communication, up-to-date security software, firewalls, log tracking, and encryption/masking. Critical system access is logged. Employee access is limited by job descriptions.

Administrative Measures: Personnel training, confidentiality agreements, KVKK-compliant supplier contracts. In case of a data breach, the Hotel notifies the Board within 72 hours and the affected persons as soon as possible.

f. Transfer of Personal Data

Data may be transferred to public institutions, banks, accountants, lawyers, auditors, insurance companies, travel agencies, IT providers, etc., in accordance with Article 8 of the KVKK. The Hotel does not transfer personal data abroad. If necessary in the future, KVKK Article 9 mechanisms will be established first.

g. Retention Periods of Personal Data

The Hotel retains personal data for the maximum periods prescribed by legislation or required by the processing purpose (e.g., Accommodation Documents for 1 year; Registration Books for 5 years; Invoice/Accounting records for 10 years; Camera recordings for 12 days; Employee files for 10 years post-employment).

h. Rights of Data Subjects

Data subjects have the right to learn if data is processed, request information, learn the purpose, know third-party recipients, request correction, request deletion/destruction, object to automated profiling, and claim damages.

3. PERSONAL DATA SUBJECT APPLICATION FORM

1. General Explanation

Pursuant to Articles 11 and 13 of the KVKK, you may submit your requests to Düzce Coşkun Mühendislik Ltd. Şti. (Data Controller). This form is prepared to facilitate fast and accurate processing of applications. Its use is not mandatory. Applications must be in Turkish.

2. Application Methods

- Deliver a wet-signed petition in person or via notary to: Kültür Mah. Akasya Sk. No:12 81010 - Merkez/Düzce – Türkiye.
- Send via KEP to duzcecoskunmuhendislik@hs02.kep.tr.
- Send via secure electronic/mobile signature to info@ramadaduzce.com.

3. Applicant Information

Name and Surname:

TR ID Number:

Nationality (for foreign applicants):

Passport Number/Foreign ID:

Address for Notification:

E-mail Address:

Phone Number:

4. Relationship with the Company/Hotel

- ☐ Hotel Guest ☐ Visitor ☐ Employee ☐ Former Employee ☐ Candidate
☐ Supplier/Partner ☐ Website User ☐ Other:

5. Your Request (Under KVKK Art. 11)

- ☐ Learn if my data is processed.
☐ Request info if processed.
☐ Learn the purpose of processing.
☐ Learn third parties to whom data is transferred.
☐ Request correction of incomplete/inaccurate data.
☐ Request deletion/destruction of my data.
☐ Claim damages for unlawful processing.
☐ Withdraw my explicit consent for future processing.

Detailed explanation of your request:

6. Application Annexes

- ☐ Document supporting correction ☐ Document showing representation/power of attorney ☐ Custody/
guardianship document ☐ Other:

7. Preferred Response Method

- ☐ To my KEP address ☐ Via postal/cargo to my address ☐ By hand delivery with ID check

8. Clarification on the Application Process

Data provided here is processed for identity verification, evaluating requests, ensuring security, and fulfilling legal obligations.

9. Declaration and Signature

I declare the information provided is correct and current; the application concerns my own data or I am authorized to represent the data subject.

Date:/...../.....

Name and Surname:

Signature (for written applications):

4. PERSONAL DATA RETENTION AND DESTRUCTION POLICY

1. Purpose

The purpose of this Policy is to determine the procedures and principles regarding the retention, deletion, destruction, and anonymization of personal data processed by Düzce Coşkun Mühendislik Ltd. Şti. ["Company"] within the scope of Ramada By Wyndham Düzce ["Hotel"] activities.

2. Data Controller and Scope

This Policy applies to guests, reservation holders, restaurant/hotel customers, visitors, employees, candidates, interns, supplier employees/officials, and other natural persons whose data is processed.

3. Definitions

Destruction: Deletion, destruction, or anonymization of personal data.

Periodic destruction: Destruction process carried out at intervals specified in this Policy when processing conditions cease to exist.

4. Basic Principles

Retention and destruction comply with lawfulness, fairness, accuracy, specified purposes, proportionality, and adherence to legal retention periods.

5. Recording Media

Data may be stored in reservation/HR systems, company servers, cloud systems, camera recorders, payment terminals, locked physical cabinets, and backup environments. Unauthorized personal devices/e-mails cannot be used.

6. Reasons Requiring Retention

Data is retained based on the Identity Declaration Law No. 1774, Tax Procedure Law No. 213, Turkish Commercial Code No. 6102, Labor Law No. 4857, establishment/performance of contracts, protection of rights, and physical space security.

7. Circumstances Requiring Destruction

Data is destroyed when the processing purpose disappears, legislation changes, retention/statute of limitations periods expire, explicit consent is withdrawn, or upon a Board decision.

8. Retention and Destruction Periods

(Excerpts) Accommodation documents: 1 year. Registration Books: 5 years. Folio/Accounting records: 10 years. Camera footage: 12 days. Employee HR files: 10 years post-employment. Wi-Fi logs: 2 years. KVKK application records: 3 years.

9. Destruction Methods

Deletion: Removing access rights, secure deletion from databases, removing physical files from active archives.

Destruction: Shredding paper documents, secure wiping of electronic media, physical destruction of disks.

Anonymization: Aggregation, masking, data reduction, making it impossible to link data back to the individual.

10. Administrative and Technical Measures

The Company limits access, takes confidentiality commitments, applies security software, and oversees destruction processes coordinated by the Hotel Responsible Manager.

11. Destruction Process

The Company's periodic destruction interval is six (6) months. Data is destroyed in the first periodic destruction cycle following the expiration of the retention requirement.

5. CAMERA RECORDINGS PRIVACY NOTICE

1. Introduction and Data Controller

We would like to inform you about your personal data processed via camera systems at our facility entrances and indoors, in accordance with the KVKK. Data Controller: Düzce Coşkun Mühendislik Ltd. Şti. (Kültür Mah. Akasya Sk. No:12 Merkez/Düzce).

2. Processed Personal Data Categories

Visual Data: Video recordings from common areas (No audio recording is collected).

Physical Space Security Data: Entry-exit movements, lobby presence, corridor passages, parking lot license plate/vehicle images, and time/date stamps.

3. Spatial Limits and Privacy Guarantee

Camera monitoring complies strictly with the "proportionality" and "data minimization" principles. Monitored areas include entrances, exterior, parking, lobby, elevators, and corridors. **No monitoring** occurs in guest rooms, SPA, saunas, massage areas, prayer rooms, bathrooms, toilets, or changing cabins.

4. Purposes of Processing

Data is processed strictly for supporting security, preventing/investigating unauthorized access and incidents, ensuring life/property safety, and establishing/protecting legal rights in disputes.

5. Method and Legal Grounds

Processed under KVKK Art. 5/2-f (legitimate interest for security), 5/2-e (protection of legal rights), and 5/2-ç (compliance with legal requests).

6. Retention Period and Cyclical Destruction

Recordings are stored on local devices for a maximum of 12 days. Loop Recording automatically overwrites older footage after 12 days. In case of an incident (crime, accident, official request), relevant footage is separated and stored securely until the legal process or statute of limitations concludes.

7. Transfer of Personal Data

Camera recordings may be transferred to Authorized Public Institutions (Police, Gendarmerie, Courts) upon official written request to fulfill legal obligations.

8. Rights of Data Subjects & 9. Application Method

You hold rights under KVKK Art. 11 (learning status, requesting correction/deletion, etc.). Applications can be submitted physically to our address, via KEP, or secure e-mail to info@ramadaduzce.com.

6. EMPLOYEE CANDIDATE PRIVACY NOTICE

1. Data Controller

Your personal data is processed by Düzce Coşkun Mühendislik Ltd. Şti. (info@ramadaduzce.com) as the data controller.

2. Processed Personal Data

Identity/contact details (name, phone, e-mail), professional experience (CV, education, references), recruitment process details (expectations, interview notes), visual data (CV photo, camera recordings if interviewed in person), and transaction security info (IP address for online applications). Special category data (health, criminal records) is not requested initially unless legally mandatory.

3. Purposes and Legal Grounds

Processed to receive applications, evaluate suitability (KVKK Art. 5/2-c: related to contract establishment), verify references (legitimate interest), retain records for legal disputes, ensure physical/IT security.

4. Collection Method

Collected directly from you, recruitment platforms, HR agencies, publicly available professional sources, and reference persons.

5. Transfer of Data

Evaluated by HR and relevant managers. May be transferred to IT/evaluation service providers, lawyers/advisors (for legal disputes), and authorized public institutions.

6. Retention Period

If successful, data is transferred to the employee personnel file. If unsuccessful, data is retained for 6 months post-process. If explicit consent is given for future positions, it is kept for a maximum of 1 year.

7. WEBSITE TERMS OF USE AND PRIVACY POLICY

1. Site Operator and Scope

The website www.ramadaduzce.com is operated by Düzce Coşkun Mühendislik Ltd. Şti. This text regulates the basic principles regarding site usage and personal data processing.

2. Site Usage and Reservations

Information on the Site aims to inform users about the Hotel. Reservations become definitive upon confirmation of conditions and payment. Special conditions shown during reservation take precedence.

3. User Obligations

The Site must be used for lawful purposes. Unauthorized access, malware uploading, or fake reservations are prohibited. Users are responsible for providing accurate information.

4. Intellectual Property Rights

Site content, designs, and software belong to the Company or rights holders. Ramada and Wyndham trademarks are used under franchise agreements. Commercial reproduction without consent is prohibited.

5. Personal Data Processing

IP addresses, access times, browser info, and cookie preferences are processed during visits. Contact/reservation form data is also processed to ensure Site operation, fulfill requests, manage pre-contractual steps, and handle legal disputes (KVKK Art. 5/2-c, ç, e, f). Marketing requires separate explicit consent.

6. Cookies and 7. Changes/Law

Strictly necessary cookies are used. Analytical/marketing cookies require explicit consent. Turkish law applies to these terms, and consumers retain their legal rights to apply to arbitral tribunals or consumer courts.

8. COOKIE POLICY AND PRIVACY NOTICE

1. Data Controller

Regarding cookies on www.ramadaduzce.com, the data controller is Düzce Coşkun Mühendislik Ltd. Şti.

2. What is a Cookie?

Cookies are small text files saved to devices via browsers when a site is visited. They ensure secure site operation, remember preferences, measure usage, and (with consent) conduct advertising.

3. Processed Data, Purposes, and Legal Grounds

Strictly necessary cookies operate based on contract performance and legitimate interest (KVKK Art. 5/2-c, f). Functional, analytical, and marketing cookies operate solely based on explicit consent (KVKK Art. 5/1).

4. Used Cookies

Cookie	Description	Max Duration
ASPSESSIONID...	Stores serialized state data for a user session.	Session
bw_cc_cookie	Cookie validation tracking.	365 days
AEC	Ensures requests within a browsing session are made by the user, preventing malicious sites.	6 months
__cf_bm	Cloudflare bot management tool to protect against bad bots.	Session
_ga / _gat / _gid	Google Analytics: generates statistical data on website usage and tracks request rates.	2 years / 2 days
_ym_d / _ym_uid	Yandex Metrica: analyzes website traffic and identifies users.	1 - 2 years
IDE / fr / _fbp	DoubleClick/Google and Meta marketing and targeted advertising cookies.	90 days - 2 years
1P_JAR	YouTube embedded video anonymous statistical data tracking.	1 month

5. Managing Cookie Preferences

Non-essential cookies are disabled by default. Visitors can "Accept All," "Reject All," or adjust "Settings." Preferences can be changed anytime via the "Cookie Settings" link. Blocking essential cookies may disrupt site functionality (e.g., reservations).

6. Data Subject Rights

Visitors have rights under KVKK Art. 11, which can be exercised via the Personal Data Subject Application Form on the website. Applications are concluded within thirty days at the latest.