

## PRIVACY POLICY

Last updated February 06, 2024

This privacy policy for Arena Otel Lokanta Ve Eğlence Yerleri İşl. Ve Turizm Yat. A.Ş. (doing business as Kalimera Istanbul) ("**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your personal data when you use our services ("**Services**"), such as when you:

- Visit our website at <http://www.kalimeraistanbul.com/>, or any website of ours that links to this privacy policy.
- Engage with us in other related ways, including but not limited to any sales, marketing, or events.

**Questions or concerns?** Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [kalimera.istanbul@hyatt.com](mailto:kalimera.istanbul@hyatt.com)

### SUMMARY OF KEY POINTS

*This summary provides key points from our privacy policy, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.*

**What personal data do we process?** When you visit, use, or navigate our Services, we may process personal data depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal data you disclose to us.

**Do we process any sensitive personal data?** We do not process sensitive personal data.

**Do we receive any data from third parties?** We do not receive any data from third parties.

**How do we process your personal data?** We process your personal data to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your personal data for other purposes with your consent. We process your personal data only when we have a valid legal reason to do so. Learn more about how we process your personal data.

**In what situations and with which parties do we share personal data?** We may share personal data in specific situations and with specific third parties. Learn more about when and with whom we share your personal data.

**How do we keep your data safe?** We have organizational and technical processes and procedures in place to protect your personal data. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your personal data. Learn more about how we keep your personal data safe.

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal data. Learn more about your privacy rights.

**How do you exercise your rights?** The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any data we collect? Review the privacy notice in full.

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### **1. WHAT DATA AND HOW DO WE COLLECT?**

#### **Personal data you disclose to us**

***In Short:*** We collect personal data that you provide to us.

According to the Personal Data Protection Law nr. 6698 (“KVKK”), “Personal data” means any data relating to an identified or identifiable natural person. We collect personal data, including but not limited to name, surname, phone number, e-mail address, that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us by phone, e-mail, post or otherwise.

**Sensitive Personal Data.** According to the Article 6 of KVKK, personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data are deemed to be Sensitive Personal Data. We do not process sensitive personal data.

All personal data that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal data.

## **2. HOW DO WE PROCESS YOUR DATA?**

***In Short:*** We process your personal data to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your personal data for other purposes with your consent. **We process your personal data for a variety of reasons only when the law allows, depending on how you interact with our Services, including:**

- Where we need to perform the contract, including providing products and services, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

The types of lawful basis that we will rely on to process your personal data include the following:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.

## **3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL DATA?**

***In Short:*** We may share personal data in specific situations described in this section and/or with the following third parties.

We may need to share your personal data in the following situations in accordance with applicable law:

Your personal data may be shared with our business partners and suppliers for data enrichment and personalised advertising purposes within the scope of carrying out marketing activities.

Subject to applicable laws, we reserve the right to disclose any Personal Data we have concerning you if we are compelled to do so by a court of law or lawfully requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws.

#### **4. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

***In Short:** We keep your personal data for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal data for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize such data, or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

#### **5. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?**

***In Short:** We aim to protect your personal data through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal data we process. However, despite our safeguards and efforts to secure your personal data, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your personal data. Although we will do our best to protect your personal data, transmission of personal data to and from our Services is at your own risk. You should only access the Services within a secure environment.

#### **6. DO WE COLLECT PERSONAL DATA FROM MINORS?**

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal data from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [kalimera.istanbul@hyatt.com](mailto:kalimera.istanbul@hyatt.com)

#### **7. WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:** You may review, change, or terminate your account at any time.*

**Withdrawing your consent:** If we are relying on your consent to process your personal data, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your

consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal data conducted in reliance on lawful processing grounds other than consent. If you have questions or comments about your privacy rights, you may email us at [kalimera.istanbul@hyatt.com](mailto:kalimera.istanbul@hyatt.com).

## **8. DO WE MAKE UPDATES TO THIS POLICY?**

*In Short:* Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your personal data.

## **9. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may email us at [kalimera.istanbul@hyatt.com](mailto:kalimera.istanbul@hyatt.com) or contact us by post at:

Arena Otel Lokanta Ve Eğlence Yerleri İşl. Ve Turizm Yat. A.Ş.

Büyükdere Caddesi D-Ofis Maslak No:No:249 Maslak Mahallesi / Sarıyer/ İSTANBUL, Türkiye

## **11. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal data we collect from you, change that data, or delete it. To request to review, update, or delete your personal data, please fill out and submit a data subject access request.