
WARP SEYAHAT HİZMETLERİ BİLİŞİM TEKNOLOJİLERİ VE TİC. LTD. ŞTİ.

EXPLANATORY TEXT ON DATA PROTECTION FOR GUESTS / DATA PROTECTION POLICY

Warp Seyahat Hizmetleri Bilişim Teknolojileri Ve Tic. Ltd. Şti. and its affiliates or subsidiaries (collectively "**Warp**", "**we**", "**us**" or "**our**") value privacy and want you to be informed about how we collect, share, disclose and use your personal information ("**Processing**"). Our approach to protecting personal information and the policy we provide for your information applies worldwide, but depending on where you live, certain provisions of this policy may not apply to you.

This privacy policy ("**Policy**") is intended to inform you about how we collect, identify and use the personal data you provide to us when you use our accommodation services through this software application ("**Apps**"), our websites ("**Websites**" or "**Sites**"), the social media sites we control ("**Social Media Sites**") and offline activities (e.g. when you submit your data by calling our call centres by telephone or in person) (all of the above are collectively referred to as the "**Services**").

We are committed to protecting the privacy of our users. We ask that you take the time to read this privacy policy carefully.

This policy contains an explanation of your rights to protect your data, including the right to object to certain processing carried out by us.

Specific provisions for different countries

Please note that your rights as a data subject may vary depending on where you live. As there may be local differences, particularly within the European Union, please contact us at info@warp.travel for more information.

Special provisions for children

We do not knowingly collect data from anyone under the age of 18. If we learn that we have collected personal data from a child under the age of 18 without parental consent, we will immediately take the necessary steps to remove the information in question and destroy the personal data without delay.

A. Processing of your personal data and purposes of processing

1. New Account Creating Process

During creating a new account, your personal data will be processed for the following purposes;

- To enable you to leave complaints about the quality of services in hotel
- To allow you to order food and drinks to your room
- To enable you to order goods through our partners and pay for them
- To be able to order and pay for services through our partners
- To enable you to participate in interactive games
- So that we can communicate with you on how we can improve our service and service quality

You can cancel your email subscription at any time by clicking on the unsubscribe link in the emails we send you.

What data is processed?	How do we get your data?	With whom do we share your data?
• First name/Surname	• Directly from you	• Third parties (hotel,

<ul style="list-style-type: none"> • Date of birth • Phone • E-mail 	<ul style="list-style-type: none"> • Parents or legal guardians 	<ul style="list-style-type: none"> • service providers, payment systems and other services) • Targeted advertising provider
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2. Cancelled or incomplete new account creating process

If for any reason you are unable to complete the account creation process, we will process your personal data so that you can finish the registration process again from where you left off in the case of starting the registration from the first step after a break.

We process your personal data in order to;

- be able to contact you again for legitimate business purposes.

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none"> • First name/Surname • Phone • E-mail • Date of birth 	<ul style="list-style-type: none"> • Directly from you • Parents or legal guardians 	<ul style="list-style-type: none"> • Third parties (hotel, service providers, payment systems and other services) • Targeted advertising provider

3. Sign-in process

You need to log in to the application using the e-mail address and password you set when creating your account. In case you saved it using the built-in tools of your cell phone, you can use them for your identification.

Your personal data will be processed for the following purposes;

- To allow you to order food and drinks to your room
- To enable you to order goods through our partners and pay for them
- To be able to order and pay for services through our partners
- To enable you to participate in interactive games
- So that we can communicate with you on how we can improve our service and service quality.

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none"> • First name/Surname • Date of birth • Phone • E-mail • Location information (using mobile data) 	<ul style="list-style-type: none"> • Directly from you • Parents or legal guardians • Your mobile phone data (with permission) 	<ul style="list-style-type: none"> • Third parties (hotel, service providers, payment systems and other services) • Targeted advertising provider

4. Procedures for hotel accommodation

When you stay at one of our hotels, we aim to make your stay as pleasant as possible. This requires the processing of your personal data in order to provide specific services during your stay at the hotel, to organise daily hotel activities, to personalise the services offered to you and/or to identify the owner of a lost or forgotten item, as well as for the legitimate business purposes of the WARP.

Your personal data will be processed for the following purposes;

- To better serve you during your stay with us,
- To perform maintenance services,
- To engage you to the possibilities of online shopping / ordering food etc. through our APP from related third-party businesses.
- To enable you to order goods through our partners and pay for them
- To be able to order and pay for services through our partners
- To enable you to participate in interactive games
- So that we can communicate with you on how we can improve our service and service quality.

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none">• First name/Surname• Date of birth• Phone• E-mail• Location information (using mobile data)• Type of payment card - number - expiry date and CVC and cardholder• Payment details (for the return of lost or forgotten items)	<ul style="list-style-type: none">• Directly from you• Parents or legal guardians• Your mobile phone data (with permission)• Our banking and fintech partners.	<ul style="list-style-type: none">• Third parties (hotel, service providers, payment systems and other services)• Targeted advertising provider• Related other companies• IT service providers• Delivery or courier services (for the return of lost or forgotten items)

5. Additional services and facilities

As a hotel guest, you can use our app to order goods, including goods from our partners and suppliers that can be delivered to the hotel, as well as services provided both directly by the hotel (e.g. ordering food and beverages for your room) and by our partners and suppliers (e.g. ordering a tour or a boat trip).

Your personal data will be processed for the following purposes;

- To engage you to the possibilities of online shopping / ordering food etc. through our APP from related third-party businesses.
- To enable you to order goods through our partners and pay for them
- To be able to order and pay for services through our partners
- So that we can communicate with you on how we can improve our service and service quality.

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none"> • First name/Surname • Date of birth • Phone • E-mail • Location information (using mobile data) • Type of payment card - number - expiry date and cardholder name • Payment details (for the return of lost or forgotten items) 	<ul style="list-style-type: none"> • Directly from you • Parents or legal guardians • Your mobile phone data (with permission) • Our banking and fintech partners. 	<ul style="list-style-type: none"> • Third parties (hotel, service providers, payment systems and other services) • Targeted advertising provider • Related other companies • IT service providers • Delivery or courier services (for the return of lost or forgotten items)

6. Guest satisfaction surveys

We may send you guest satisfaction surveys during or after your stay to evaluate the performance of our hotels. You can cancel your guest satisfaction survey email subscription at any time by clicking on the unsubscribe link in the emails we send you.

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none"> • First name/Surname • E-mail • Arrival and departure date • Booking details (including booking number) 	<ul style="list-style-type: none"> • Depending on the booking method; • Directly from you via the online booking form • Via the online booking channel you use to make the booking • From your travel agent • From our call centre • Directly from the Royal Diwa Hotel you have booked 	<ul style="list-style-type: none"> • Related other companies • Guest satisfaction survey provider

7. Online games

Users, including children, can use one of the many online games available in the app (e.g. shooting gallery or racing), which are linked to specific locations in the hotel and become available to the user when he or she is located at specific geographical coordinates within the hotel. During the games, the user accumulates virtual points, which are used to rank the best players.

Your personal data will be processed for the following purposes;

- tracking your progress in the game
- understanding your position on the property
- ranking of top players

What data is processed?	How do we get your data?	With whom do we share your data?

<ul style="list-style-type: none"> • First name/Surname • Date of birth • Phone • E-mail • Location information (using mobile data) 	<ul style="list-style-type: none"> • Directly from you • Parents or legal guardians • Your mobile phone data (with permission) 	<ul style="list-style-type: none"> • Other users (for scoreboard rating) • Own statistics service • Hotel (if requested)
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8. Analytical methods

Your personal data will be processed for the following purposes;

- Optimise your experience,
- To increase our marketing, commercial and operational efficiency,
- To segment our guests based on personal data,
- For analytics purposes, to personalise our offers and promotions according to your preferences and consumption habits.

As part of these analytics, we may analyse and combine various data we hold about our guests, including guest satisfaction survey responses, guest communications with us, click-through rates for our marketing communications, guest behaviour on our websites, bookings and other information we receive.

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none"> • F First name/Surname • Date of birth • Phone • E-mail • Location information (using mobile data) • Type of payment card - number - expiry date and cardholder name • Payment details (for the return of lost or forgotten items) 	<ul style="list-style-type: none"> • Directly from you • Parents or legal guardians • Your mobile phone data (with permission) • Our banking and fintech partners. 	<ul style="list-style-type: none"> • Related other companies • IT service provider • Analysis service provider • Targeted ads provider

9. Social media and online reviews

The processing of your personal data received via social media platforms (including Facebook, Instagram, Linked In, Weibo and Twitter) or online reviews of our brands (including those on Trip Advisor) is processed for the purpose of improving our services and identifying business opportunities, as it is in our legitimate interest to process your personal data that you submit to us or share publicly on social media platforms, online booking channels or other (comment) websites.

Your personal data will be processed for the following purposes;

- To answer your questions and complaints
- To monitor our online reputation

- To improve our services and identify opportunities for us to focus on

What data is processed?	How do we get your data?	With whom do we share your data?
<ul style="list-style-type: none"> • Personal data that you provide to us or that you post about us on social media or other review platforms 	<ul style="list-style-type: none"> • Directly from you via public social media pages, online booking channels or other (rating) websites. • Our online monitoring service provider 	<ul style="list-style-type: none"> • Related other companies • IT service provider • Service provider

B. Basic rules for the processing of your personal data

Although your personal data may vary depending on the service, product or commercial activity we provide, they will be processed in accordance with the principles set out below, pursuant to Article 4 of the Personal Data Protection Act:

- a) In accordance with the law and in good faith.
- b) Accurate and, where necessary, up to date
- c) For specific, explicit and legitimate purposes
- d) Relevant, limited and proportionate to the purpose for which they are processed
- e) Data shall be kept for as long as provided for by the relevant legislation or as necessary for the purpose for which it is processed.

In this context, our company processes your personal data for the following purposes:

- Carrying out the management and activities of our company in accordance with legislation, company policies, procedures and instructions,
- Carrying out corporate communications and management activities,
- Fulfilment of contractual, product and service conditions and fulfilment of assumed obligations in a complete and correct manner and execution of contractual processes.
- Complying with legal obligations,
- Carrying out advertising/campaigns/promotional processes
- Offering for sale the products and services offered by our company,
- Ensuring communication and business relationships between suppliers, business partners, external service providers and customers, and planning supply chain management processes,
- Ensuring information and process security and executing access authorisations,
- Planning and implementing business continuity processes,
- Ensuring the physical, legal and commercial security of the company, its personnel, its customers and those who have business relations with the company,
- Conducting marketing analysis studies,
- Ensuring employee and customer satisfaction, managing customer relations and dealing with enquiries and complaints,
- Resolving problems and complaints of the persons concerned, ensuring their satisfaction and providing an efficient service
- Carrying out financial, accounting and operational procedures,

- Organisation and event management,
- Carrying out storage and archiving work
- Carrying out audit and risk management activities and quality control procedures,
- Fulfilment of the objectives of the establishment of the joint venture and customer service,
- Responding to requests for information from administrative and judicial authorities and following up on all legal procedures,
- Providing information to authorised persons, institutions and organisations.

When you click on a link to a third-party website, you will be redirected to a website that is not under our control and our privacy policy will no longer apply. Your browsing and interaction on another website is subject to the terms of use, privacy and other policies of that third party website.

C. Method and legal basis for the collection of personal data

Your personal data will be collected through all types of oral, written or electronic media in order to provide the products and services offered by our company in accordance with the purposes set out above, within the established legal framework and, in this context, so that our company can fully and correctly fulfil its contractual and legal obligations. For these legal reasons, your personal data will be collected by means of manual or electronic media within the terms and purposes of the processing of personal data in this disclosure document.

D. Transfer of your personal data

Your personal data collected may be disclosed to our business partners, suppliers, company representatives, shareholders, legally authorised public bodies and private individuals in order to carry out the necessary work of our business entities to enable you to benefit from the products and services offered by our company by adapting them to your tastes, your usage habits and needs, to ensure the legal and economic security of individuals (administrative processes for communications carried out by the company, ensuring the physical security and monitoring of our company's sites, processes for evaluating business partners/customers/suppliers (agents or employees), reputational research processes, legal compliance processes, audits, financial matters, etc.) associated with our company and our business units.) that have business relationships with our company and group of companies, to establish and implement our company's commercial and business strategies and to ensure the implementation of our company's guest service policy, will be disclosed under the conditions set out in this disclosure text by taking the necessary measures.

Persons to whom the data may be transmitted	Description	Purpose of the data transfer
Business partner (agency, client, etc.)	It defines the parties with whom the company has entered into business partnerships for purposes such as the purchase or sale of services in the conduct of its commercial activities.	Limited to the purpose of ensuring the fulfilment of the purpose for which the joint venture was established and assessing the agent or employee.
Suppliers	It defines the parties who supply products/services to the Company on a contractual basis in accordance with the Company's orders and instructions in the course of the Company's business.	Limited to the purpose of ensuring that the products and services which the Company obtains from the Supplier and which are necessary for the performance of the Company's business are made available to the Company
Company authorities	Members of the Board of Directors of the Company and other authorised natural persons	Limited to the purpose of ensuring physical security and surveillance of the Company's sites, developing strategies for the Company's commercial activities in accordance with the

		relevant legislation, ensuring a high level of management, developing financial matters and the like
Legally authorised persons under private law	Persons under private law who are authorised to receive information and documents from the company in accordance with the relevant legal provisions	Limited to the purpose requested by the private law persons concerned within the scope of their legal powers
Legally authorised public institutions and organisations	Public bodies and organisations authorised under the relevant legislation to receive information and documents from the company	Limited to the purpose required by the competent public institutions and organisations within the scope of legal authority

E. Storage of your personal data

Your personal data may be processed for as long as necessary to carry out the activities set out in this policy, until you are notified otherwise, or for as long as permitted by applicable law. For example, we may retain your personal data where reasonably necessary to comply with legal obligations, to comply with the requirements of law, to resolve disputes or litigation and for other purposes deemed necessary to implement this policy.

To determine the appropriate retention period for the data we collect, we assess the potential risks arising from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes by other means, as well as any applicable legal requirements.

F. Measures relating to the security of personal data

WARP is aware of its responsibility to ensure the confidentiality and security of the personal data it processes and shall exercise due diligence. In addition to the requirements of the relevant legislation, it takes the necessary technical and administrative measures at an appropriate level to ensure the confidentiality and security of data within the framework of Article 12 of the Personal Data Protection Act. These administrative and technical security measures are intended to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to maintain personal data at an appropriate level of security.

Should your personal data unlawfully come into the hands of third parties, the data owners, the Board of Directors and other relevant public institutions and organisations will be notified in accordance with the provisions of the relevant legislation. The technical and administrative measures taken to store personal data in accordance with the Security Act and relevant legislation and to prevent unlawful processing and access are set out below but are not limited to those listed.

G. Your rights as a data subject

You have the following rights in relation to the processing of your personal data;

- a) To know whether or not your personal data have been processed,
- b) To request information if personal data have been processed,
- c) To know the purposes for which personal data are processed and whether they are used for those purposes,

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- d) To know the third parties to whom personal data are communicated, whether at home or abroad,
 - e) To request rectification of personal data in the event of incomplete or inaccurate processing,
 - f) To request the erasure or destruction of personal data,
 - g) To request communication of the operations referred to in letters e) and f) to third parties to whom personal data are communicated,
 - h) To object to the analysis of the data processed solely by automated systems leading to a result which is prejudicial to the data subject,
 - i) In the event of damage caused by the unlawful processing of personal data, to obtain compensation for the damage suffered,

Your requests in your application will be processed free of charge within thirty days at the latest, depending on the nature of the request. However, if the process requires additional costs for the Company, the fee provided for in the tariff established by the Personal Data Protection Committee in the "**Communiqué on the Procedures and Principles for Applications to the Data Controller**" may be charged.

In connection with the processing of your personal data, you must submit your application to our Company by completing the application form on our Company's website, in writing or using your registered email address, secure electronic signature, mobile signature or email address previously provided to us and included in our records. Our Company may require additional verifications (e.g., send a message to your registered phone number, call you) to determine whether the application belongs to you according to the reason for your request and your application method, and thus to protect your rights. For example, if you apply via your email address registered with the company, we may contact you via another method of communication registered with the company to ask you to confirm whether the application belongs to you.

H. Submitting a request to the data controller

Pursuant to Article 13(1) of the Personal Data Protection Act, you may submit your request to our Company in writing or in any other manner determined by the Data Protection Committee. In this regard, the channels and procedures for submitting your written request to our company under Article 11 of the Personal Data Protection Act are explained below.

To exercise your above-mentioned rights, you can access the KVKK application form with the required information on your identity at <https://warp.solutions/kvkk> and send it signed to the company.

- After completing the application form, a wet-signed copy of the application form must be sent to Yesilova Mahallesi, Aspendos Bulvari No: 168/C kat:1, 07200 Muratpasa, Antalya, Turkey by hand or via a notary,
- The application form must be completed and sent to the e-mail address info@warp.travel by using your "secure electronic signature" or mobile signature under the Electronic Signature Act No. 5070 or by using the e-mail address previously provided by the data subject to the data controller and registered in the data controller's system

In order for third parties to file a request on behalf of the personal data controller, there must be a specific authorisation issued by the data controller through a notary on behalf of the applicant. In order to determine whether or not the applicant is the personal data controller, the Office may request information from the person concerned and ask questions of the personal data controller in order to clarify the points mentioned in the request.

These rights will be considered and processed within 30 (thirty) days if communicated in the manner specified in the policy. Although it is essential not to charge a fee for the requests, the Company reserves the right to charge a fee based on the fee scale set by the Personal Data Protection Committee.

CONTACT DATA

Address: Yesilova Mahallesi, Aspendos Bulvari No: 168/C kat:1, 07200 Muratpasa, Antalya, Turkey

Contact: Ms.Aylin Sadak

Mobile Phone: + 90 531 103 8248