**Privacy Policy - Cookies and Personal Data**

**Effective Date:** 10.09.2021

As Ruz Gayrimenkul Insaat Turizm Anonim Sirketi (“**Ruz Gayrimenkul**”), we care about protecting the personal data of our esteemed visitors. In this context, the website <https://www.ruzhotels.com> (“**Site**”), which is managed and operated by Ruz Gayrimenkul, we would like to enlighten and inform you about your personal data that we process through any digital platform provided and processed in accordance with the Personal Data Protection Law No. 6698 (“**KVKK**”).

Some of your data is collected, processed, stored, or transmitted by Ruz Gayrimenkul during the visit of Site and subscribing to the e-bulletin and these data may classify as a personal data.

The following describes how and how the personal data obtained / to be obtained during use of Site is obtained, how and how such data is collected, processed, stored, transferred and your rights to your personal data. Ruz Gayrimenkul protects your privacy in accordance with the following rules and provisions of KVKK.

**Collection of Personal Data and Method of Collection**

Personal Data is information that identifies you or can be used to identify you. The information you share with Ruz Gayrimenkul through Site, application or other digital platforms may be covered by personal data. Examples of personal data include your personal information, name, surname, date of birth, city / country of residence, gender, e-mail address, telephone number, home address, internet protocol (IP) address. Some of the personal data you provide to Ruz Gayrimenkul is compulsory (such as IP information), and some are information you provide to Ruz Gayrimenkul with your consent and depending on your preference.

When you visit Site, we may obtain the following information from you, either fully or automatically, in the following ways:

**Personal Data You Share with Us in Order To Get in Contact With You**; We obtain some personal data such as name and surname, e-mail address and telephone. We process this personal data to establish a healthy communication with you.

**Usage Data:** After entering Site as a visitor, usage and traffic data is processed. This may include data on which parts of the website you visit, what you click on, when you perform these actions. In addition, our network servers keep log files; these files save data each time a device accesses them.

**Device Data:** When you use a mobile device such as a tablet or phone to access our services, data such as your IP address, operating system version, device type, system and performance information, and browser type are processed. Halicarnassus Tourism can also access the "device identifiers" on your device. It may collect, monitor, store on your device and / or remotely store one or more "device identifiers". Device identifiers are small data files or similar data structures stored on or associated with your mobile device that uniquely identify your mobile device. Device identifier may be stored data or data sent by Ruz Gayrimenkul to the device and this data is determined depending on the hardware of the device, operating system or other software. Device identifier may provide information to Ruz Gayrimenkul or its third-party partners about your movement over Site, your demographic information, and how you use the service of Ruz Gayrimenkul. Device identifier also can help Ruz Gayrimenkul or others to provide reports, personalized content and advertisements. If the availability of device identifiers is impaired or blocked, some features in our services may not work properly.

**Processing of Personal Data and Processing Objectives**

The personal data collected by Ruz Gayrimenkul can be used collectively in various ways to optimize and improve the services of Ruz Gayrimenkul to users through this database. Ruz Gayrimenkul can use this personal data for application management, security, promotional activities, research and analysis. Personal data processed by Ruz Gayrimenkul shall not be disclosed to the public.

Ruz Gayrimenkul process your e-mail address and other contact information in order to provide detail information about its campaigns, opportunities promotions are to you.

In addition, it is also possible for us to process and share your personal data with third parties provided it is anonymized It shall be noted that this personal data is anonymous, so it cannot be identified.

In order to provide better service to you and provide service optimization, Ruz Gayrimenkul shall use your personal data and any content you provide for advertising, promotion, announcements belonging to yourself or others.

Ruz Gayrimenkul is obliged to take the necessary technical and administrative measures to ensure the proper level of security in order to prevent the unlawful processing and access of personal data and to maintain the personal data by taking maximum care in keeping your information. In the event that your personal data is processed, changed or deleted by unauthorized entry into the system containing personal data stored by Ruz Gayrimenkul, the operation of the system becomes corrupted or changed, Ruz Gayrimenkul has no obligation, except to inform the relevant person and the relevant administrative authorities. Each time you visit Site, your IP address, operating system, your browser (chrome, explorer, etc.), connection time and duration information and similar information are automatically saved; It is possible that your information obtained without your consent is used by Ruz Gayrimenkul in connection with your personal data or anonymously provided that it is not shared with third parties.

In order to benefit from the services offered by Ruz Gayrimenkul, all personal data proccesed is protected in accordance with our obligations under the legislation on the protection of personal data to which we are subject.

Ruz Gayrimenkul provides limited access to personal data to employees and business partners who need access to relevant information, particularly to third party business partners, legal obligations, or Ruz Gayrimenkul system operation.

Retention of Personal Data: Personal data obtained from Site, application and other digital platforms in accordance with this Policy shall be stored for a reasonable period of time for the purposes set out in this Policy. Accordingly, Ruz Gayrimenkul complies with generally accepted online advertising industry standards to ensure that personal data remains secure, accurate, and up-to-date and is only kept as long as necessary for its intended use. These standards include performing physical, electronic, and management activities necessary to protect personal data integrity, access, and use. Because personal data processed through Site is processed for commercial communication purposes in general, the personal data will remain in our systems until the cancelling the request for commercial communication.

**Transfer of Personal Data, Purpose of Transfer and Recipient Groups to Transfer**

**Ruz Gayrimenkul** shall be able to share your personal data with third parties in the country and or abroad that having a contractual relationship with Ruz Gayrimenkul and with the public institutions or organizations authorized to request personal data.

Ruz Gayrimenkul shall not cause the personal data of the users to be rented, sold or shared with others or unrelated companies (eg for direct marketing purposes). However, Ruz Gayrimenkul may share non-personal (anonymous) collective information with third parties.

Ruz Gayrimenkul may share personal data with companies providing services (such as data processing centres or customer service centres), considering its legal obligations. These service providers are obliged to protect this personal data.

Ruz Gayrimenkul may share personal data with third parties if it considers that a reasonable explanation is necessary in order to realize its own terms and conditions or to ensure transactional or user security.

According to the article 11 of KVKK, you may contact Ruz Gayrimenkul any time in order to obtain information regarding the following matters under the Law;

Learn whether or not her/his personal data have been processed,

Request information as to processing if her/his data have been processed;

Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose; Know the third parties in the country or abroad to whom personal data have been transferred;

Request rectification in case personal data are processed incompletely or inaccurately;

Request deletion or destruction of personal data within the framework of the conditions set forth under article, Request notification of the operations made as per indents (d) and to third parties to whom personal data have been transferred;

Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;

Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data

You can always send your requests in writing to the address below.

**Cookies**

Cookies are small data files that we store on the device you use when accessing our services so that we can recognize users on a continuous basis. All cookies expire after a certain time and it depends on the reason we use it. Cookies are used for several reasons explained below:

**Security Reasons:** We use cookies to verify your identity. (or, for example, determine whether your session is still open on Site).

**In order to provide you with personalized content:** We may store user preferences in cookies such as the default language to personalize the content you are viewing.

**To improve our services:** We use cookies to measure your use of the Site, track your referral data and sometimes show you different content versions. This information provides us improve our services and optimize the content we show to users.

**Types of Cookies in Terms of Use**

**Mandatory Cookies:** These Cookies are essential for the proper operation of Site. These cookies are required to manage the system, to prevent fraudulent transactions and if these cookies are blocked, Site will not function properly.

**Analysis / Performance Cookies:** These Cookies enable us to analyze and understand the operation of the Site and improve the Site by interacting with you. The use of these cookies may be blocked.

**Function Cookies:** These cookies are used to provide you an easier and improved user experience. Remembering your previous preferences will allow you to easily access certain content on Site. The use of these cookies may be blocked.

**Targeting / Advertising Cookies:** These cookies are used to identify and provide you with content that may be of interest to you, including advertising content. The use of these cookies may be blocked. However, this blocking will not serve the entire content of the ad, but will only serve ads with general content instead of ads that may be of interest to you.

**Types of Cookies in Terms of Retention**

**Persistent Cookies**: Cookies that are deleted by the person on the person's computer or that exist on a specific date. These cookies are often used to measure users' preferences and Site movements.

**Session Cookies:** These cookies are used to separate the user's visit into sessions and do not process data from the user. These cookies are instructed when the user stays inactive for a certain period of time or closes that web page. Site uses target and tracking cookies to provide services to third parties and to increase the effectiveness of these services. These cookies can remember web pages and sites you visit and process personal data, especially the IP address of the user device. Site uses both first-party and third-party cookies to collect information, remember demographic data and interests, serve you targeted ads, and determine ad impressions and the number of visits.

The internet browser you are using usually opens with cookies accepted. However, you can change these settings and disable Cookies at any time. As described above, If you decide to disable cookies; you may not be able to functionally utilize the services we provide on Site. For detailed information about cookie settings of internet browsers, please visit the following links:

•Internet Explorer: https://support.microsoft.com/en/help/17442/windows-internet-explorer-delete-manage-cookies

• Safari: https://support.apple.com/en-us/HT201265

• Chrome: https://support.google.com/chrome/answer/95647?hl=en

• Firefox: https: //support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences

• Opera: http://help.opera.com/Windows/10.20/en/cookies.html

Please note that if you do not make the necessary browser and / or e-mail settings to disable cookies, you consent to our use of cookies.

**Amendments and Updates**

This Privacy Policy may be revised, edited and updated as new features are added to Site, application, or other digital platforms, or as new suggestions from our users arrive. However, in this case, we will notify you by posting the changes on our website. In some important cases, we may report such changes by additional notice, as appropriate, by e-mail or by any other remarkable method reasonably designed to notify you. If you continue to use our services after the notice period upon your notification of such changes, you will be deemed to have permitted changes to our privacy policy. Therefore, we recommend that you review Privacy Policy every time you visit the Site. If the provisions of Privacy Policy are changed, they become effective on the date of publication.

**Ruz Gayrimenkul Insaat Turizm Anonim Sirketi**

**Asmalmescit Mah General Yazgan Sok No 6 D1 Beyoğlu İstanbul**