

Privacy Policy (Kvkk Policy)

This Policy includes personal information arising from or directly obtained from legal, commercial or financial relations with the customer, its personnel and the real or legal persons with whom it has communication and interaction with **SINOP TURIZM YATIRIMLARI ANONİM ŞİRKETİ** within the scope of KVK Law No.6698 and KVK Policy Book (KINGSMAN GOLF TRAVEL). Kingsman Golf Travel aims to make arrangements for the processing of data, to determine the conditions to be complied with, to declare and announce.

Personal data are collected by Kingsman Golf Travel electronically or verbally by means of automatic or non-automatic methods, such as registration on the platform, telephone, fax, e-mail, sms and other social media channels, mobile applications, including audio and video recording. can be collected in a physical environment.

Within the framework of Article 5 of KVKK numbered 6698

- a) The explicit consent of the data owner,
- b) It is clearly stipulated in the laws,
- c) It is necessary for the protection of the life or physical integrity of the person who is unable to disclose his consent due to the actual impossibility or whose consent is not legally valid,
- d) It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or execution of the contract issued as a result of approval and / or signature with Kingsman Golf Travel,
- e) It is mandatory for Kingsman Golf Travel to fulfill its legal obligation,
- f) It has been made public by the person concerned,
- g) Data processing is mandatory for the establishment, use or protection of a right,
- h) Data processing is mandatory for the legitimate interests of Kingsman Golf Travel, provided that it does not harm the fundamental rights and freedoms of the person concerned.

and again within the scope of Article 6

- a) The explicit consent of the data owner,
- b) In other cases stipulated by laws

Kingsman Golf Travel personal data of the person concerned, in Turkey by obtaining the necessary security measures or mainly EU countries, the United States, other countries, including Britain, storage located abroad, archiving, information technology support received servers, hosting companies, programs and other cloud computing, etc. can transfer to electronic media, process and store.

We reserve the right to modify or amend this Policy at any time and will display the effective date at the end of this Policy. Previous versions can be obtained by contacting us.

It is important that you read this Policy together with any other privacy notice or fair processing notice that we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other notices and is not intended to override them.

This Policy is organised into sections which you can click through to :

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1. What Personal Data we collect

As a travel business, we need to collect certain personal data (such as name, address and contact details) from you to ensure that we can make the arrangements for your golf break with the golf, hotel and other suppliers, and in order to perform your golf break contract services. We will also collect your personal data to able to provide you with details of future golf holidays and for the other purposes set out in this Policy. We will ask for your consent or rely on another legal basis for processing before we process your personal data, in accordance with the Data Protection Laws.

Under the Data Protection Laws, personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical physiological, genetic, mental, economic, cultural or social identity of that natural person.

We will collect personal data, such as your full name, address, email address and telephone number when you:

- make an enquiry with our sales team;
- make a booking for a golf holiday;
- make a payment for a golf holiday;
- make a service case or ask a question to our customer service team;
- start a live chat session with our contact centre;
- register for an account in our secure customer portal;
- enter a competition;
- register for events; or
- subscribe to our email newsletter;

If you make a booking with us we will also ask you to provide us with the name and contact details of the other members of your party. Where we make flight bookings as part of your golf break, we may also need to ask you for your passport details.

Health and mobility information: When you make an enquiry or a booking with us, we will ask you to disclose whether you have a medical condition or health issue or have any restrictions on your mobility. See the Section below on "How we use your Personal Data" for information for details of why we need to process this information and how we will obtain your consent. If you choose not to disclose this information to us or do not give us your consent to use it for the outlined purposes, we may not be able to provide the services you have requested due to our legal responsibility to provide you with a safe holiday.

2. How we use your Personal Data

Enquiries:

When you make an enquiry about a golf break, we will use the personal data that you provide to us, such as name and contact details, to enable us to service your enquiry and take the steps that you request towards making a possible booking with us.

Bookings:

When you make a booking for a golf break, we will need to use your personal data such as name and address to make the travel arrangements for your break and otherwise as necessary to ensure that your booking contract is performed. This will usually require us to pass your personal data on to relevant third party suppliers of your travel arrangements such as hotels, airlines, transport providers, ground agents and destination management companies.

In order to effect your booking, we may also need to provide your personal data: to security or credit checking companies and/or credit and debit card companies in order to take payment for your booking; and to regulatory or public authorities such as customs or immigration if required by them, or as required by law.

Where we need to disclose your information to a third party for the fulfilment of your travel booking, we require that third party to have appropriate technical and organisational measures in place to protect your personal data and to process your data in accordance with our instructions and the Data Protection Laws.

3. Security and storage

We take appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data. This includes, as appropriate: the pseudonymisation and encryption of personal data; the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; the ability to restore the availability and access to personal data in a timely manner in the event of a physical or

technical incident; and a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

When you provide your personal data through our website, this information is transmitted across the internet securely using high-grade encryption. In addition to this, we are a PCI DSS compliant company. This means we adhere to high security standards in order to protect your payment card details when you make a booking over the phone or pay your balance through your online account in our secure customer portal.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

The information that you provide to us will be held securely in our systems, which are located on our premises or those of an appointed third party. We will only allow access to your personal data by third parties who act for us for the purposes described in this privacy policy or for other purposes approved by you.

We will only retain your personal data for as long as is appropriate and necessary to the fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements, taking into account the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, and whether we can achieve those purposes through other means. We will limit the period for which personal data is stored to a minimum. We will set time limits for erasure or periodic review. You may request details of our retention policy and in addition, you have a right to have your personal data restricted or erased – see more details under “Your Rights” below.

4. Your rights

(In accordance with Article 11 of the KVK Law No. 6698)

Related persons, regarding their personal data, of their personal data via the following e-mail address of Kingsman Golf Travel;

- 1) Learning whether it has been processed,
- 2) Requesting information if processed,
- 3) Learning the purpose of processing and whether it is used appropriately,
- 4) To know the third persons transferred domestically or abroad,
- 5) Requesting correction if incomplete / incorrectly processed,
- 6) Request deletion, destruction or anonymization of personal data in case the reasons requiring the processing of personal data disappear,
- 7) To request the notification of the transactions made in accordance with the paragraphs (5) and (6) above, against the third persons to whom they are transferred,
- 8) To object to the emergence of a result against you because it is analyzed exclusively with automatic systems,

9) To demand the compensation of the damage in case of damage due to unlawful processing

And it has other rights written in the legislation.

5. Sharing your personal data

Personal data of the person concerned; to be requested by official institutions and organizations in cases deemed necessary by the legislation, as a requirement of the activities and responsibility of Kingsman Golf Travel, domestic / foreign solution partners, project partners, program and cooperation partners, supplier company, with which they have commercial, legal and economic relations, electronic and physical security measures required by institutions and organizations, independent auditors, banks and financial institutions, other companies, individuals and organizations that receive aid and support, consultancy firms such as lawyers, financial advisors, law, informatics, quality and finance consultants and Kingsman Golf Travel can be shared by taking. Can be transferred. These sharing and transfer transactions are also valid for abroad.

6. Cookies and other tracking technologies

We use cookies and other tracking technologies on our site. These allow you to use our site and specific parts of the site, such as your Kingsman Golf account, effectively, as well as give us information about your use of our site which we use to develop and improve our site. A list of all the cookies that we use and what we use them for are set out in our Cookie Policy (see Cookie Policy tab). We will ask for your consent to cookies unless they are strictly necessary for the purpose of enabling the use of our website or a specific service that you request. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

7. Third party websites

Our site may, from time to time, contain links to and from the websites of our partners and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Personal data collected by Kingsman Golf Travel for the legal reasons stated above can be processed or transferred in line with the purposes of this policy previously described,

taking into account the personal data processing conditions specified in Articles 5 and 6 of the Law on the Protection of Personal Data No. 6698.

Data Controller Who Can Apply Under Law

For more detailed information or for your problems, requests, suggestions and complaints regarding the KVK Policy, you are kindly requested to apply to privacy@kingsmangolf.com.

Kingsman Golf Travel

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